

## CASA – New CEO / New Era

CASA has a new CEO and a new Chairman of the Board. New CEO Ms Pip Spence is a long term Infrastructure Executive who, in the past, has had extensive experience with domestic and international civil aviation. The task ahead of her is great, but achievable, and we have confidence that the necessary changes will be implemented during her time. Congratulations, Ms Pip Spence, we look forward to your stewardship of CASA, open consultancy and transparency.

For instance, CASA has two major on-going roles to specialise in, provision of regulatory services, some are needed 24/7, and the provision of regulatory oversight. A monopoly regulatory service that has buried itself in red tape.

Aviation is a 24/7 industry that has to be supported by a 24/7 regulator, or regulator delegates, so commercial operations and emergency operators can continue to operate safely.

Currently CASA is not responsible to proactively obtain international recognition of Australia's civil aviation manufacturing and maintenance capabilities to enable trade. This has to be corrected by Infrastructure.

The Act states that CASA has a responsibility to promulgate Aviation Safety standards; these should be in the form of "Civil Aviation Safety Standards" which, in reality, are a replacement of the previous Civil Aviation Orders that contained those standards.

Civil Aviation Safety Standards should comply with Article 37 of the Convention discussed in our last [Newsletter](#).

The current use of "Manual of Standards" is out of step with international aviation language and another disconnect between Act and Regulations. Mentioned in S98 of the Act is a "furphy".

Placing the responsibility of developing a regulatory system in 1988 on CASA has demonstrated that this proposal has been an utter failure and government should shift this responsibility to Infrastructure and CASA to promulgate harmonised Civil Aviation Safety Standards. It is time to set it right.

**Civil Aviation Act:-** Infrastructure – Parliament of Australia

**Civil Aviation Safety Regulations:-** Infrastructure – Governor General.

**Civil Aviation Safety Standards:-** CASA – Infrastructure – Federal Register

**Civil Aviation Advisory Material:-** CASA – CASA website

The Act states CASA promulgates [Civil] *Aviation Safety Standards* so stay consistent.

Change "Manual of Standards" to Civil Aviation Safety Standards and be consistent with the Act for both domestic and global transparency.

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## **1. CASA – A Monopoly Regulatory Service Provider?**

Over the last six months we heard that CASA was making changes in how they were doing business and, if the provision of regulatory services to our members are to be believed, we now have an unproductive and inefficient regulatory service provider.

If a civil aviation business was run this inefficiently, they would be out of business.

- a. We have a civil aviation industry that operates 24/7 but a regulator that only operates 5 days, minus public holidays, a week.
- b. We have a regulatory service provider that utilises a single office system for a multi-office business – highly inefficient that adds to their costs.
- c. When you submit an application to CASA for a regulatory service it is forwarded to next available officer no matter where they are located.

Members have brought the following to our notice:

1. A person submits 4 copies of a SoM because there is 4 aircraft, same type and model and 4 registered operators.  
CASA's REGSERVICES send one copy each to 4 different CASA officers in 4 different States.
  - Why not send 4 copies to one officer in the local geographic office?
2. A person attends one CASA local office to be video interviewed by another CASA officer in another State for an authorisation. Why not the local geographical office that knows the business do the interview?
  - a. This has happened on a number of occasions.
3. A couple of CASA officers from the West assigned assessment of an organisation on the East Coast. Additional travel costs.
4. Officers in the East being assigned assessment tasks in the West that required travel from the East to the West. More travel costs.
5. We are also told the same is happening with CASA FOIs doing check flights.

These are but a few of the regulatory services assignments we have been told about; each and every one demonstrates inefficiency and unproductive processes.

Approved operators and organisations with more than one location must have the appropriately qualified persons at each location.

Does CASA have the right manpower at each location to service the industry in that location? Obviously not. CASA's predecessors opened smaller offices in regional locations to reduce their overall travel and accommodation budget associated with travel for assessment and regulatory oversight. But, having qualified officers at a location and assigning work based on next available officer irrespective of location is dumb.

**Solution:** In the short term, assign all regulatory service work submitted to CASA to the nearest CASA geographical office. Save CASA and industry heaps.

In the long term, reduce the amount of regulatory services dependent on CASA by devolving, where possible, to industry delegates and reform the regulatory system by adopting FAR based performance regulations to reduce the number of services.

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## **2. Entry Standards to Civil Aviation.**

Costs to enter the civil aviation industry, compared to the costs to enter civil aviation in the USA, is simply too high. The regulatory impost is a major hurdle and the costs associated at airports are above those compared in the USA.

The problem is aviation regulatory reform since 1998 has not explored ways to reduce the regulatory burden, especially on the general aviation sector like they did in the CAA(UK) to meet their government Red Tape Challenge in 2013.

The FAA system is performance based and reduces regulatory imposts compared to our system but it shifts responsibility from the regulator to different entities in the industry. e.g. The goal of a US airport master plan is to provide the framework needed to guide future airport development that will cost-effectively satisfy aviation demand, while considering potential environmental and socioeconomic impacts.

Refer [FAA AC 15-150-5070-6B](#), **Airport Master Plans**, that comprehensively specifies what has to be taken into consideration in airport development plans. Very detailed and different to Australia Airport Plans standards. If this AC was applied in Australia, aviation, including general aviation, would be growing, not reducing. **Extracts:**

*"A master plan uses locally generated aviation forecasts as the basis for identifying the need and timing of airport development. FAA reviews the local forecasts and forecast methodology to ensure that they are appropriate and that they provide an adequate justification for the scope, and timing of proposed airport development."*

*"**Non-aeronautical revenues** provide the best opportunity for an airport sponsor to establish new types of lease revenue, based on the use of existing land parcels at the airport. **An example** of such an arrangement is a **short-term lease** of land to grow hay, grass or to graze cattle, which would allow the airport sponsor to increase revenues while maintaining control of the future use of the land."*

In Australia, the opposite has happened. This land has been long-term leased to non-aviation commercial businesses that cannot be used for future aviation development.

If the FAA entry standards from the following provisions were adopted in Australia, the entry costs would be lowered with less regulatory impact but a safer aviation industry.

**FAR Part 21**, *Certification Procedures For Products And Articles*; **Part 43**, *Maintenance, Preventive Maintenance, Rebuilding, and Alteration*; **Part 65, Subparts A, D & E**, *Certification: Airmen Other than Flight Crewmembers*; **Part 91**, *General Operating and Flight Rules* should be the basis of Australia's regulatory system simply because we have a similar environment and industry, the FAR structure was adopted in the 1990s.

General Aviation needs an avionic and mechanical LAME similar to what we had under the CARs or a modified A&P system where the FAR use of "avionic" specialists is replaced by an avionic LAME.

Industry has lost faith in CASA's ability to develop a safe cost effective civil aviation regulatory system. They have been at it for many decades and have demonstrated they do not have the ability. If industry fails to meet standards they are shut down.

**Solution:** Adopt these FAR provisions and associated regulations, orders and advisory material in the same manner that CASA adopted FAR Part 21 in 1998.

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### **3. Type Ratings + Part 66 Changes**

Part 66 has proved itself a failure as far as general aviation is concerned. It is not an Australian compatible licencing system and it has permanently damaged the previous avionics and mechanical trade training system that was provided by TAFE colleges.

Our previous licencing system was based on licencing tradespersons that met both knowledge and practical skills. It also progressively dropped type ratings for aircraft not listed in Groups 19/20 and covered them by GROUP Ratings.

It is time to bring back the proven AME licence GROUP ratings that worked.

EASA added GROUP ratings to Part 66 BUT CASA refuses to adopt.

Aircraft distributors in Australia closed their LAME type training schools as they were removed from Groups 19/20 and have not re-opened these training schools even though Part 66 brought these type ratings back. The EU has multiple type training schools; North America has many type rating training schools but we don't have the number to support type training in Australia.

The current type rated licencing system is a knowledge system mainly based on attendance at foreign CASA approved LAME training schools. EASA now accepts these courses being provided on-line.

CASA has adopted the EASR Part 66/147 regulatory standards, then why can't Australian AME and LAME do the EASA approved on-line courses? They must meet the CASR promulgated standards seeing we have adopted the EASRs?

CASA has approved a number of foreign type training facility type courses to provide their Australian approved type training course on-line during the COVID era.

Employers are looking at this cost and the personal risks, e.g. COVIG, associated with sending a valued employee into foreign countries to do type training courses. This is an enormous risk to the employee in this COVIG world.

For a LAME that has a couple of aircraft type ratings, has enough knowledge and experience to do an AME type rating course on-line. It should, no, it must become the norm in this advanced technology era.

Let's look at another cost saver, if the aircraft manufacturer provides or approves a LAME B1 or B2 type rating course provided by an external training provider, what value is added for CASA to approve the course?

If EASA has approved a LAME B1 or B2 type rated aircraft course, what value is added by CASA also approving?

This is like the days when CASA issued aircraft type certificates for US manufactured aircraft that held FAA aircraft type certificates.

**Solution:** We need CASA to issue aircraft type "Course Acceptance Approvals" for all EASA approved LAME B1 and/or B2 aircraft type courses. This would reduce costs without any safety reduction.

Short term changes need to be immediately introduced or Australia will simply be held back commercially outside the airline industry because of lack of qualified LAMEs.

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