

A NEW VISION REQUIRED – POST COVID

We all know the damage that has been done to the airlines and the rest of aviation during the COVID restrictions. We must accept that a return to pre COVID could be a number of years away.

Australia once had a Small Aircraft Transport System (SATS) where the skies were well populated with private and commercial small aircraft until the politicians decide to “economically” reform the commercial aviation transport sector.

Some charter and commercial helicopters are prospering under the current restrictions but rural aviation is a shadow of its former self.

Before reform, the use of aircraft to transport professionals, tradespersons, private owners and others to and from rural locations was common.

Flying in Australia however, has become very expensive compared to the USA – Australia is about the same geographical size as continental USA but with less than 8% of their population. The economics of scale is a major criteria.

We have the distances and remoteness of rural locations but without the population that makes it commercially viable.

USA: For industries that streamlined pandemic life, made it safer, or both, 2020 did have its upsides. First-time customers to private aviation, for example, swelled by 300 percent year over year, with thousands of people flying privately for personal travel for the first time—a silver lining considering corporate travel by private jet declined by 80 percent during the same period. (extract from a Forbes article)

We need an industry wide program to encourage new private flyers instead of the silo system restricting such growth. Unless there is growth, the regulatory system is failing the aviation sector of transport.

With the threat of COVID easing, there should be a program to encourage private travel to reduce the risk of COVID infection.

“In 1970 a Cessna 172 was 1.3 times the average salary in the U.S. and a Bonanza was 5 times the average. Today it is 6 times the average salary for a 172 and 14 times the average salary for a Bonanza.”

Is this why aircraft sales are not booming?

Is it time to encourage Australia’s engineering aircraft designers back into designing, manufacturing aircraft, or manufacturing aircraft under licence?

We must however amend CASR Part 21 to fully harmonise with FAR Part 21 from where it was sourced from originally.

CAN CASA new CEO change to encourage civil aviation growth? I hope so.

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1. CASA Unable to Type Certificate Aircraft?

Australia has lodged a “difference” to Annex 8 of the Convention stating that Australia does not design or certificate aeroplanes above 5700Kgs. The only reason we can think of is that it is an admission CASA no longer employs the engineering expertise to perform that function.

Maybe this explains the problems that many are having with gaining CASA engineering to issue APMAs and ATSOs. No experienced engineering design expertise employed.

We know of two projects where larger aircraft were proposed to be built in Australia.

CASA is not a designer, it is entrepreneurs and engineering expertise in industry who design aircraft. So why does government restrict the growth and job creation?

Political double talk. Say they support creation of jobs, administratively restricting.

Legislation enables such projects that would provide high level skills, technology and jobs in Australia. It would also raise Australia’s global engineering reputation.

AMROBA has sent a letter to the DPM, cc CASA Board Chair, Sectary DITRDC, CEO CASA, Senate Review of Aviation asking why Australia lodged such a difference?

Up till the introduction of CASR Part 21 in 1998, CASA and its predecessors were very experienced and capable of certificating larger aeroplanes and helicopters.

No wonder Australian STCs, APMAs and CAR21M modifications fitted in VH registered transport aircraft are not acceptable to foreign NAAs when the aircraft is sold off-shore.

Lodging this difference to the Annex is saying to all other NAAs that CASA’s engineering expertise is limited to aeroplanes below 5700Kgs. A limitation on CASR Part 23.

Annex Difference.

AMROBA has requested the Government to immediately remove the ‘difference’ they have lodged against the *Convention on International Civil Aviation*, Annex 8, 2.4.2.1 stating that “**aeroplanes above 5,700Kg MTOW are not designed or manufactured in Australia**’.

“Annex 8, 2.4.1 When approving production of an aircraft, engine, propeller or associated part, the Contracting State having jurisdiction over the organization responsible for production shall:”

If CASA had updated CASR Part 21 when FAR Part 21 was amended in 2009, then maybe this issue may not have arisen unless it was planned by political/bureaucracy to reduce the capability of the civil aviation manufacturing industry.

Regulatory reform once had an aim to remove differences to the ICAO Annex standards so it would enable the Australian civil aviation design, manufacturing and maintenance sectors access to foreign markets.

Politicians supported the policy of CASA design, manufacturing and maintenance inspectors maintaining their expertise by attending applicable courses provided by the FAA or other NAAs. Obviously this practice has been abandoned.

The <5700 Kg limitation (9 seats) does not enable designs under CASR Part 23 limit that globally includes another level above 5700Kgs:

CASR/FAR/CS Part 23: **Level 4 – for aeroplanes with a maximum seating configuration of 10 to 19 passengers.**

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2. Part 66 ICAO Competency Based Training Standards.

Annex 1, Chapter 4, AME training standards has been amended to include a new formal training manual, Doc 9868, Part III, Training and Assessment Aircraft Maintenance Personnel. This ICAO State Letter sent to each member State, informs each Country that new competency training standards are now contained in *The Manual on Training of Aircraft Maintenance Personnel (Doc 10098)*.

“Annex 8. 6.6.4 The maintenance organization **shall** establish the competence of maintenance personnel in accordance with procedures and to a level acceptable to the Contracting State granting the approval.”

ICAO produced a syllabi under the last revision to Annex 1 and have now promulgated competency based training standards for the AME.

These competency based AME training standards must be adopted ASAP to stop the wasteful review and changes to the NVET training system based on CASR Part 66 75% pass mark. ICAO new CBT training standards will mean the NVET AME training can conform with global standards for the benefit of industry.

ICAO’s new AME licencing competency standards are based on;

- | | |
|--|---------------------------------|
| 1. Perform Testing Fault Isolation; | 5. Repair; |
| 2. Perform Disassembly; | 6. Perform Assembly; and |
| 3. Clean; | 7. Perform Storage |
| 4. Perform Inspection/Check; | (Transportation). |

Cost Savings.

Major savings can be made with adoption of the latest ICAO AME Competency Standards. Global competency standards underpinning Australian NVET CBT system.

Ever since CASA adopted the European Aircraft Maintenance Engineer licencing system, they implemented a system that is not compatible with the National Vocational Education Training (NVET) system that has been based on Competency Based Training for over 24 years.

Pre the partial adoption of the EASR Part 66, all industry wanted was for CASA to accept the NVET qualification for all the trade aspects of the Basic examinations.

ICAO Difference:

Sadly Australia has lodged a difference to Annex 1, 4.2.1.4 stating that: “**CASA does not provide specific guidance material on the design and development of training programs for aircraft maintenance personnel**”.

This difference should have been lodged against Annex 8 that lists “**no differences**”; Annex 1 is AME licencing requirements.

Annex 8. 6.6.4 The maintenance organization **shall** establish the competence of maintenance personnel in accordance with procedures and to a level acceptable to the Contracting State granting the approval.”

AMROBA has recommended to CASA that they follow the EASA lead and set up a regulatory implementation committee to adopt these new standards iaw the State Letter sent to Australia.

This may be the solution to the current problems with NVET AME training standards.

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3. Australia's Annex Differences

Any NAA that wanted to assess the compliance of another NAA, only have to look on-line to the country's Aviation Information Publication (AIP)

AIP Differences are assessable on the Airservices website: [AIP Differences](#)

Just click on each Annex and read how many "differences" have been lodged.

After 20 years of regulatory reform, we have more differences than we ever had before.

No wonder other NAAs have Australia in such low regards.

Regulatory Reform that started in yr 2000 after a Parliamentary Inquiry, has totally failed the civil aviation industry.

By now we should have been harmonised globally and many Bilateral Aviation Agreements should be in place so our design, manufacturing, maintenance and technical training activities are recognised in their own right. The applicable Annexes that you should open and read the lodged differences are:

Annex 1. Personnel Licensing

Annex 5 Units of Measurement

Annex 6. Parts I, II, III – Continuing airworthiness requirements

Annex 7. Aircraft markings

Annex 8. Airworthiness of aircraft (design/maintenance)

Annex 19 Safety Management

Most people that have looked at these differences are astonished that Australia has lodged so many after being told in the past that regulatory reform was to remove the differences so that we harmonised with the Annexes for better recognition globally.

One point that has been drawn to my attention is that Australia appears to dislike using ICAO definitions or terminology. Why?

The number of difference that states 'not defined in legislation' is amazing.

What would a foreign NAA think when they see so many differences and many stating not included in Australian legislation.

Compared to the differences lodged by NZ it is no wonder we have global marketing issues. Some of the wording used in the differences makes one wonder whether the technical expertise exists to draft differences.

These differences provide the evidence that regulatory reform has failed the civil aviation industry. Compliance with the Annex standards, instead of being different, would more than likely lower regulatory overheads.

"Australian legislation does not define 'State of Design'"

A comparison with the USA Annex 8 differences is quite remarkable. As we adopted FAR Part 21, you would expect our differences to mirror image the US differences.

No, we are quite different. How can we adopt FAR Part 21 and have separate differences to those submitted by the USA?

No matter we are not part of the **global aviation system**.

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