

Differences with ICAO Annexes

The 2023/2024 ICAO audit/report “highlighted areas where “Australia could more fully realise the benefits of closer alignment with ICAO’s standards and practices (SARPs)” and these areas will be responded to through corrective action plans agreed with ICAO”.

Those “corrective action plans” should be made public. It has nothing to do with security or secrecy.

AMROBA has been recommending adoption of ICAO standards for 20 years. Differences lodged with ICAO are very misleading to any other nations assessing our differences. For instance, Annex 1, Chapter 4 difference:

Annex 1 - Chapter 4 Difference	Comment
1. Australia has a national competency-based training and assessment model for aircraft maintenance personnel.	1. The first sentence is factual but the only link is the Diploma course for airline aeroplane LAMEs.
2. CASA does not provide specific guidance material on the design and development of training programs for aircraft maintenance personnel.	2. The second sentence confirms that Australia does not align with the ICAO Annex 1 & 8 standards and practices for AME training programs.
3. All training packages are developed and designed to be encompassed into nationally recognised qualifications that are aligned to the Australian Qualifications Framework.	3. The third sentence is the same as the first sentence., there is no recognition of AQF qualifications in Parts 66/147.

This is misleading information being provided to ICAO and other nations, stating Australia has competency-based training and qualifications but not working with ASQA or recognising AQF AME qualifications for helicopter and unpressurised aeroplanes in regulatory requirements.

All the major regulatory systems “provide specific guidance material on the design and development of training programs for aircraft maintenance personnel, especially EASR Parts 66/147 that were partially adopted.”

By government **not providing** specific guidance material on the design and development of training programs for aircraft maintenance personnel, compliance with ICAO SARPs have not been implemented, nor has harmonisation with EASR Parts 66/147 A & B regulations.

- **Australia now has a critical shortage of aircraft maintenance personnel.**
- **Australia is not a major regulatory system.**

The USA, EU, Canada, Brazil, UK are major regulatory systems.

It is no wonder why ICAO stated that Australia (industry) would benefit from adopting SARPs.

Remember, past CASA CEOs stated they would urgently realign Part 21 with FAR Part 21 but have done nothing.

Annex 8 36 Differences	32 Standards and Recommended Practices have no reference in CASR Parts 21 through Part 35.
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Ever since CASA decided to use EASA regulations as the model for CASRs, the differences with the ICAO Annexes SARPs have continued to rise. Why haven’t governments met the intent of the Convention?

“ICAO: These ICAO standards are essential because they ensure uniformity and consistency across the global aviation industry. When countries adhere to ICAO SARPs, they can be confident that their aviation practices meet internationally recognized safety criteria. This uniformity is particularly crucial for international flights, where aircraft and personnel from different countries must operate seamlessly together.

ICAO monitors member states’ compliance with its safety standards and recommended practices through safety oversight audits and reviews.

These audits identify areas where member states may be falling short in implementing safety standards and recommend corrective actions. This proactive approach ensures that countries continuously work towards improving their aviation safety systems and practices.

The harmonization of aviation safety standards promotes global connectivity by removing barriers and ensuring compatibility among aviation systems worldwide. This enables smoother international travel, trade, and cooperation, ultimately benefiting economies and societies around the globe.”

- Why is government/CASA living in the past? **Nobody knows.**
- Why won’t they look to the future? **Nobody knows.**
- Why won’t they implement ICAO SARPs? **Nobody knows.**

ICAO provides courses for NAA staff on how to “Plan and Implement ICAO SARPs.”

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The Case to Adopt EASA Annex VD Part CAO – (GA AMO)

Part CAO – EASA GA AMO: CASA's management is so wedded to the EASA system; then why don't they provide the flexibility that is built into the EASA system and adopt & implement their GA Aircraft Maintenance Organisation Approval? This would replace a lot of CAR30 AMOs. Ideal for the non-pax carrying sectors.

This EASA requirement is very close to how GA operated pre-CAA/CASA except for Permits to Fly.

Why hasn't/won't CASA consider/adopt the EASA **Part CAO – Combined Airworthiness Organisation**?

Combined Airworthiness Organisation (Part-CAO) Overview

“EASA Part CAO provides a simplified organisation approval for General Aviation (GA) which provides an alleviation against many of the requirements (For example – *No Safety Management System (SMS)*).

Part-CAO was not created only to replace the Subpart F Maintenance Organisation, but rather to offer a completely new type of maintenance organisation, which is specifically adapted to the needs of GA.

In addition, there is typically a reduced involvement of the Regulatory Authority.

A Combined Organisation is allowed to obtain the following 4 privileges:

- | | |
|--|----------|
| a) Maintenance | Standard |
| b) Continuing airworthiness management (CAM) | New |
| c) Airworthiness review (AR) plus issue (AR Certificate) | New |
| d) Permit to fly issue. | New |

What is the Scope and Features of Part-CAO Approval?

a) **Non-complex motor-powered aircraft (When they are not operated by licenced air carriers*)**

b) **No SMS requirement** (However note the 'Quality System' QA & QC is applicable)

Note – Small CAOs can replace the quality system by regular organisational reviews (subcontracting of CAM tasks not allowed)

c) **Partial Approval Possible** (For example without Continuing Airworthiness Management).

d) A single exposition Combined Airworthiness Exposition (CAE) for all elements.

*** air carrier providing transport to passengers departing or arriving in a Member State”.*

CAA(UK) has provided a [Sample Part CAO Exposition](#) that could be adopted for CASR Part xxx CAOs.

EASA Part CAO Introduces a Number of Simplifications

- The approval certificate has been simplified, with no indication of aircraft types, just aircraft categories and associated privileges
- No** man-hour requirement for Maintenance or CAM (Continuing Airworthiness Management)
- No** requirement to record the recency of certifying staff.
- No minimum age for certifying staff.
- More** privileges for the organisation to introduce changes.
- For activity** on light aircraft, NDT and/or component other than complete turbine engine, the 'scope of work' can be changed in accordance with an approved procedure.
- Changes** to location, facilities, tooling, equipment, material can be managed by the organisation.
- The possibility to work outside an approved location is not limited to line maintenance.

Concerning CAO Permit to Fly

A CAO with AR/ARC privileges may be additionally approved to issue a permit to fly.

Note 1 – Limited to CAO registered in EU Member State and for those particular aircraft for which the CAO can issue the ARC (Airworthiness Review Certificate).

Note 2 – Permit to fly is issued by the airworthiness review staff authorised by the CAO.

Transition to Part CAO

a) CAMO or Part-145 Organisations will be issued a Part CAO approval upon application.

b) The current scope of work will be maintained by introducing limitations in CAO approval.

c) Limitations can be removed (if desired) only after complying with the corresponding elements and including the corresponding procedures in the CAE.

d) “Controlled environment” is not affected by the transition period.

e) The organisation can benefit from the new Part-CAO alleviations/privileges only when the CAO is approved

f) Part-CAO approval will generate a new organisation Approval reference.

Note 1 – This will require an update of EASA Form 1 and ARC.

Note 2 – Only Organisations with CAM approval will be able to develop the Approved Maintenance Program (AMP).”

It means powers currently exercised by CASA would be devolved to the Part-CAO & Part 145 on application.

Is this a step too far for CASA to consider.

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The Case for Adopting EASR Part 66 B3 & B2L

To address the current shortage of licenced aircraft maintenance engineers, adoption of EASA's Part 66 B3 and B2L licences would make enormous steps to address these shortages. They are entry level licences needed by the aviation industry.

When CASA partially adopted the EASR Part 66/147 they never kept harmonised with the many changes that EASA has made to Part 66/147, and continue to make, so their AME licencing system would work properly within the maintenance sectors, especially GA, Aerialwork, and small aircraft commercial operations.

We have given up trying to work out why CASA management won't maintain harmonisation with the EASR Parts 66/147 system and want to restrict the industry to the outdated EASA system that did not work. The same approach within CASA is applied to CASR Part 21 and harmonisation with FAR Part 21.

- Why is the regulator living in the past?

Industry and the rest of the world have moved on whilst government is 15-20 years out of step globally.

No wonder ICAO stated that Australia could more fully realise the benefits of closer alignment with ICAO's Standards and Practices (SARPs).

Benefits of the B3 AME 2000kg aeroplane licence.

The B3 is applicable to piston-engine-non-pressurized aeroplanes of **2000 kg MTOW and below**. Category B3 licence entitles the holder to issue Certificates of Release to Service and to act as **B3 support staff** for: *work on avionic systems requiring only simple tests to prove their serviceability and not requiring troubleshooting.*

The B1.2 and B3 licences, in the European system, also cover some recreational aeroplanes.

The B3 is a good entry level at the non-complex aircraft maintenance level.

B3 Training

According to EASA, the B3 training is 1000 classroom hours, compared to the B1.2 training of 2000 classroom hours. This would mean a B3 LAME could attain his/her licence in half the time thus addressing the current critical shortage of qualified maintenance personnel.

In GA, below 2000Kg aircraft are fairly numerous and the B3 will assist with CAR 30 staffing, especially if it became an EASA Part CAO. This would assist pilot training operations' maintenance organisations.

The transition to B1.2 would be the next step or to B1.3/4 for helicopters. Adds to the career pathways.

What this industry needs now is simplified career pathways and the B3 is crucial new career starting point.

Benefits of the B2L AME Avionics Systems licence

B2L licence: – For avionics and electrical systems. For aircraft other than those in the group of complex aircraft (Group 1). Based on "system ratings". Progressive (eventually leading to a full B2, if so wished).

It is the same as B2 but limited to the systems endorsed on the licence. It is divided into the following 'system ratings': communication/navigation (com/nav), instruments, auto flight, surveillance, airframe systems.

Adopting the EASA B2L system also aligns Australia with every other nation, many in this Asia Pacific region, that has an EASA Part 66 licencing system. Commonsense to adopt.

Summary:

Pre CAA, if you entered a GA maintenance organisation you would find cabinets/shelves filled with many owners' aircraft logbooks. The Chief Engineer was performing airworthiness control on behalf of the owners. They would review and inform the owner of all the work needed to be done when the owner submitted the aircraft for its next maintenance as detailed on the maintenance release.

What EASA has done is recognise that is what happens and created a GA maintenance organisation (Part CAO) that can add this function to its capabilities. Certifying an aircraft's annual inspection achieves the same as the EASA "airworthiness review" that was required in Australia.

What is new is EASA has also devolved the responsibility to issue a "permit to fly" to the maintenance organisation – a proposal that was also considered by CAA in the mid-1990s.

EASA has not restricted these functions, airworthiness review and issue permit to fly, to Part CAO maintenance organisations but stated that the Part 145 AMO and the CAMO can apply for these functions.

In other words, EASA has been working with their maintenance industry and providing functions to all involved in the maintenance sectors. Part CAO, Part 145, CAMO can all do "airworthiness reviews, issue airworthiness reviews certificates and also issue permits to fly". Time for Australia to adopt.

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