

1. EASA AME Licensing Can Work if CASA makes Changes.

Eleven years ago, CASA adopted (part of) a European licencing system, against the will of the GA community, that basically damaged an excellent trade training system that under-pinned a CASA licencing system that met the needs of GA as well as the airlines. To the detriment of the GA industry, the failure to adopt all the EASA provisions and the retention of the CAR 31 group rating system has lowered skills.

The education system is now caught in a Catch 22 situation where CASA has not yet adopted important EASA provisions that enable government funding to be increased for trade and licencing training. Government has stated they will increase the funding when CASA adopts Appendix A of EASR Part 147 that stipulates course duration and the split between theoretical and practical.

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2. Converting to the FAA System – Solutions

Adopting the USA system for GA, not just the FAR system, is fully supported by AMROBA as long as one of the most important factors of the USA system is addressed in our regulations. The USA has a very big FBO system supporting GA (Ops & maintenance) that is expressed in FAR Part 43 as a fixed based operator without any further reference. This system has been in place for decades whereas Australia included the FBO/AMOs in the regulatory system. To adopt the FAR system, like NZ did, would remove regulatory control over current CAR 30 GA AMOs and collapse a system that works. This aspect must be looked at when the future of CAR 30 is addressed post Part 43 adoption.

The FAA promulgates [AC 150.5190.7](#) that specifies standards for the USA FBO AMOs that we recommend should apply to current CAR 30 GA AMOs on conversion. CASA should promulgate this standard as the standard for CASR Part 145 (Domestic) to differentiate from a CASR Part 145, preferably aligned with FAR Part 145, the most recently modernised Part 145 globally. We are not in favour of the word **light** because of public perceptions. By having a CASR Part 145 (Domestic), that excludes the airline aspects and includes the FAA AC above standards for a GA AMO, it would enable the adoption of the USA system properly. The CASR operational Parts will determine whether Part 145 or Part 145 domestic applies.

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3. Political and Bureaucracy Support is Essential

Most aviation industry associations have come to realise to obtain a fair aviation regulatory system we need political support like never before. This is needed when sustainable growth of an industry is not the aim of the current regulatory system. Aviation would not have grown unless past regulators listened to the ambitions and proposals of our aviation pioneers and created a regulatory system so their proposals became reality.

Without doubt, this all changed when CAA was created for many reasons.

However, when all of the general aviation associations met in Wagga it removed the perception built up within the political and bureaucracy that there were differences in opinions and separate GA associations had different opinions on the directions for GA. That perception was nurtured by questionable government consultation processes used to divide sectors of the aviation industry by selective consultation.

Since Wagga, many politicians, government departments and even some within CASA have come to accept that the industry has one aim, to remove impediments to enhancing safety and the growth of GA.

Entry pathways into aviation must be multiple as provided in the USA and even EASR Part 66.

Maybe the Wagga Summit got this message across to many politicians and the bureaucracy. [Read More](#)

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The education system is now caught in a Catch 22 situation where CASA has not yet adopted important EASA provisions that enable government funding to be increased for trade and licencing training. Government has stated they will increase the funding when CASA adopts Appendix A of EASR Part 147 that stipulates course duration and the split between theoretical and practical.

AMROBA continually lobbies CASA to include these figures in the Part 147 MoS. CASA is continuing to hold back the reforms needed so the education can convert to modular trade/licence training in CASR Part 66.

Even if CASA provides Basic Examinations based on Part 66 modules, we will not be able to improve the trade skills until education is correctly funded as have all other nations that adopted the EASA system.

If we don't have an education system that issues "qualifications" for each separate module applicable to a licence how does CASA issue a licence?

Promulgating course duration has nothing to do with competency-based training, it is about government funding trade/licence training. Adopting it applies the same standard as EASA and every other country that has adopted the EASR Part66 system.

The UK provided competency-based training before Australia mandated it.

What is it about our politicians and ^{Safety All Around} bureaucracy that relishes in applying standards that prevents Australia harmonising with the same country from where we adopt a system?

We automatically accept the design rules, FAA & EASA, under Parts 21-34 but not an adopted AME licencing system from EASA. Why deny the so-called benefits of an adopted system that has damaged the trade training and licencing system in this country?

CASA implemented CASR Part 66 but still has not made a regulatory sunset regulation for the CAR 31 system examinations, or the current qualifications from the VET system. CASA should sunset acceptance of diploma and state they will only issue a licence on confirmation of 75% pass mark for each module applicable to the licence rating sought. Same as EASA/NAAs.

CASA, after 11 years, is still preventing education reform by not promulgating the EASA course duration to match the EASA knowledge and experience requirements.

Neither political party objects to CASA adopting the EASR Part 147 Appendix A that has been listed in previous Newsletters. Both major parties support meeting global standards and our globally adopted standard is the EASA Parts 66/147 course duration.

The Education's *Aerospace Industry Reference Committee* has on its work plan the task of re-packaging of the MEA training package into AME Modular training packages starting next year, if they obtain funding. They estimate 4-5 years to complete.

Add 3 years for the first intake to start modular training and we are looking at 7-8 years before we get the first student holding VET qualifications for each applicable module.

A system that should have been available within 3 years of Parts 66/147 being made.

Whether a training package finishes with a diploma or not should not be a concern of CASA. Their responsibility is to ensure the applicant for a licence has the regulatory required experience and has passed all modules with a 75% pass mark applicable to the licence sought.

Many years ago, pre CASR Part 66, it was agreed with the Education Department that the trade modules on their own were trade levels at AQF 4 and by adding the licencing requirements to the trade package enabled it to meet the AQF 5 level (Diploma).

Under Part 66, it can be much clearer in that they are all trade AQF 4 modules but adding Module 10 meets the AQF 5 diploma levels.

This principle must be resurrected as a basic of the AME training qualification system.

Supported: CASA to provide AME Basic Examinations for each Part 66 module.

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CASA's predecessors, before CAA, included a formalised USA/FBO AMO system by creating similar standards to the USA/FBO AMO system in ANOs for Department approved AMOs that only had to comply with a specific ANO.

FAR Part 43 can be implemented without any substantial change to the current GA environment except to provide clarity and reduce costs. Introducing the LAME with an **Inspection Authorisation** overcomes a shortfall in the current training of module 10 and it has an overall enhanced safety factor with little cost attached. CASA needs to use modern technology to provide an on-line eLearning module where LAME/IAs can biennially access to view updates in regulatory changes – this is the main purpose of the FAA IA refresher training.

In the past, there were no written procedure manuals, quality was based on “direct supervision” that has always provided a safe outcome as any inspectorate system in large companies. This kept costs down so GA could safely flourish by keeping aircraft maintenance costs reasonable for owners.

The last thing any regulatory reform should do is collapse an Australian industry. The GA maintenance industry is costlier than it needs to be because of regulatory impost not only by CASA but an increasing number of other government departments and agencies.

Government departments and agencies make excellent statements regarding minimising regulatory impost but little success when implementing. Copying from another country also needs careful vetting to prevent duplication of unnecessary requirements when other government regulatory requirements already address the provision.

Regulating only where necessary is the aim of most other NAAs and government's own Best Regulation Guidelines provides the same direction.

CASA can still introduce FAR Parts 43 and 91 airworthiness/maintenance aspects with minimal differences and replace many unique CASA requirements. Implement by referring to the FAA relevant advisory document.

CASA needs some of their GA staff to be trained by the FAA Academy.

Recommendation: Send some experienced CASA field staff to the FAA academy and have them train the rest of the CASA field staff.

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The USA system is by far the largest GA system in the world and has a safety record second to none. So why would you not adopt the system for Australia with a less populated country but similar in size.

Entry pathways into aviation must be multiple as provided in the EASA and FAA systems.

Maybe the Wagga Summit got this message across to the political and bureaucracy at last. CASA must provide as many pathways as possible to allow new participants to enter in to our aviation world. There has to be a real stop to restricting pathways and freedom of choice.

Fighting for Your Freedom to Fly has never been truer than at this moment.

MULTIPLE PATHWAYS TO ENTER AVIATION NEEDED

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