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NEWSLETTER

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EASA continues to evolve and many changes have been implemented since they first created their licencing system. Most recently this year, August 2018. It is interesting that EASA's state that ‘component maintenance certifying staff shall be qualified in accordance with the requirements in force in the Member State’. What VET qualifications?

EASA also state that **AMCs** cannot introduce new requirements nor alleviate the requirements in their Annexes (regulations).

The problem in Australia is CASA introduced regulations and standards that specify modular training requirements that, 11 years later, the Education Department has not endorsed any module training package supporting Part 66 in the VET system.

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2. Understanding the Authorised Release Certificate?

This document is based on adopting international harmonised requirements for the use of specified Release Certificate for manufactured and Return to Service maintained products. The maintenance aspects quite often cause different opinions on the use of this document.

Basically, it used to release an item from manufacture or maintenance utilising the same terminology that was agreed at an international meeting back in the late 1990s. It was done to assist with an international move to standardised documentation to be used globally.

An important point that was agreed on was to also use this form electronically.

CASA advisory still improperly states that: ‘5.1 The primary purpose of the ARC under Part 4A of CAR is to declare the airworthiness of maintenance work undertaken on an item whereas it is used more broadly in the USA, Canada & EU.

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3. Is CASA's Terminology Designed to Paint a Negative Record.

Anyone that's been involved with aviation engineering understands the meaning of “Safety Findings” with relation to design/manufacturing. So where did the use of terminology “Safety Finding” and “Safety Observation” to identify deficiency or safety concerns come from? Is CASA using this unique terminology for maximum effect in the judicial system?

Why not use the same terminology as other major CAAs so records are comparable? Why do Australian public servants always want to use different terminology instead of harmonising?

According to CASA, a Safety Finding is not used to address an administrative issue.

CASA's Surveillance Manual

Safety Finding (SF): A notice issued to an authorisation holder for the purposes of identifying a **breach** of a legislative provision or a provision of the authorisation holder's written procedures.

Safety Observation (SO): A notice issued to an authorisation holder to identify:

- latent conditions resulting in system deficiencies that, while not constituting a legislative or procedural breach, have the potential to result in such a breach if not addressed and/or
- potential areas for improvement in safety performance

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Industry Expectations – Basic Modules Qualifications – Trade		
Apprenticeship/Trade		Trade Modules
Aircraft Maintenance Engineer	<i>Aeroplane (turbine)</i>	1 – 9, 11, 15 & 17
	<i>Aeroplane (piston)</i>	1 – 9, 11, 16 & 17
Aircraft Maintenance Engineer	<i>Rotorcraft (turbine)</i>	1 – 9, 12 & 15
	<i>Rotorcraft (piston)</i>	1 – 9, 12 & 16
Aircraft Maintenance Engineer	<i>Avionics</i>	1 – 9, 13 & 14
Additional Training for AME Licence		
Aircraft Maintenance Engineer – Aeroplane/Rotorcraft/Avionics		Licence module 10

Adopted European modules are taught at different training levels depending on trade outcome. This had been removed from Australian training to improve transportability of qualifications. Module 10 for LAMEs based on compliance to international standards.

Australia’s VET and apprenticeship system has not yet been structured, after 11 years, to meet the CASA promulgated AME training standards.

CASA Responsibility

It is CASA’s administrative responsibility to work with Federal and State Educators and negotiate the changes to the AME apprentice training system to implement what they promulgated 11 years ago. This may require Federal/State ministerial support/approval.

Current RTOs are trying to meet two different Regulators (CASA & ASQA) with two different education standards – industry suffers because no whole of government policy.

AME Apprenticeships

Every State apprenticeship system should be capable of providing training that meets the aviation regulatory standards.

Australia has/had an avionic and mechanical trade training system that needs to be updated to meet regulatory and industry needs. Adoption of the European system has to be included in the apprentice training system.

FAR Inspection Authorisation Adoption Impact

Adoption of FAR maintenance regulations also requires adaption of the A&P *Inspection Authorisation* into the CASR Part 66 and the NVET system. The IA training standards are covered by an ICAO compliant CASR Part 66 Module 10 functions.

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The FAA state the purpose of the ARC is:

- Manufacturing:** a. for domestic airworthiness approval, including conformity inspections, repositioning of new products or articles pending approval, and splitting bulk shipments of previously produced products and articles;
- Maintenance:** b. Approval for return to service of products and articles; and
- Exporting:** c. Export airworthiness approval of products and articles.

The creation of the “authorised release certificate” (ARC) came about after a period of multiple documents such as conformity documents, individual repair station release tags, etc. that were used globally. In many cases, they were referred to the local aviation regulator to verify their authenticity. When the USA, Canada, UK and other NAAs, including Australia, agreed to standardise the ARC and procedures to complete the form, it was a fore runner to Bilateral Aviation Agreements/Bilateral Aviation Safety Agreements being used. The Form 1 ARC conforms to a standardised, internationally recognised format for the release of both new and used (maintained) aeronautical products. When used to certify the maintenance of used parts, it forms a means for issue of the ICAO ‘maintenance release’ as required by State Regulations. When used to certify new parts, it provides a means for issue of the statement of conformity required by State Regulations.

The ARC may be used for items intended for installation on foreign aircraft, as well as for domestic purposes. It is considered to be valid worldwide but acceptance of the items certified on it will be dependent upon the regulations of the national civil aviation authority concerned and on compliance with the terms of any applicable bilateral agreement or technical arrangement between that authority and Australia/CASA. When using the ARC to satisfy such special conditions, compliance must be certified according to the requirements of the applicable agreement or arrangement. The ARC is not a delivery or shipping note.

The ARC does not constitute approval to install the maintained item(s) on a particular aircraft, engine, or propeller but helps the end user determine the item’s airworthiness approval status.

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3. Is CASA Terminology Designed to paint a bad picture

Wherever did the use of terminology “Safety Finding” and “Safety Observation” come from? Is CASA using this unique terminology for maximum effect in the judicial system?

Why not use the same terminology as other major CAAs so records are comparable? Why do Australian public servants always want to use different terminology instead of harmonising?

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- potential areas for improvement in safety performance

According to CASA, a "Safety Finding" is not used to address an administrative issue. However, we have seen many SFs that highlight administrative errors like forgetting to date and tick a box on a form.

What do the other major regulators do:

ICAO: The **resolution of identified deficiencies and safety concerns** is a critical element at the core of all safety oversight activities. A good safety oversight system will provide for the identifications of deficiencies and safety concerns and appropriate action required for resolution. Once the cause of the deficiencies is determined, the CAA should provide deadlines for corrective action to be taken and initiate appropriate follow-up to determine the effectiveness of the corrective actions.

- Deficiencies and safety concerns identifies.
- **Resolution of is the critical element.**
- Corrective action.

FAA uses the following terminology: "Providing written correspondence to the repair station documenting any findings listed on the SIS Form 8. Include the corrective action times from the MAG

"Corrective Action". An action designed to eliminate or mitigate a deficiency that has been identified.

"Deficiency". A condition which is insufficient or incomplete, or where something required is lacking.

The following is the EASA interpretation of audit findings:

- a) **"Level 1 finding"** is any **non-compliance with EASA Regulations, which could lead to uncontrolled non-compliance's with applicable airworthiness requirements and could affect the safety of the aircraft**. Level 1 findings are considered most serious and concern any significant non-compliance with EASA regulatory requirements in particular, where it is seen that such non-conformities could lower the safety standard and hazards and seriously the flight safety.
- b) **"Level 2 finding"** is any non-compliance with EASA Regulations which is not classified as level one. Level 2 findings may still be seen to lower the safety standard **and possibly hazard the flight safety** or may be a non-compliance to the Organisational Procedures.
- c) **"Level 3 Observation"** is any item where it has been identified, by objective evidence, to **contain potential problems that could lead to non-compliance**. (However, to note that it is neither a Level 1 or Level 2 finding means that it does not meet the current criteria to identify it as a "finding").

Considering CASA's preference is to follow EASA, one wonders why their Surveillance Manual did not adopt the EASA definitions of their 3 levels of audit findings/observation. They actually make sense when read carefully.

CASA needs to have the same terminology as the US FAA or EASA when it comes to recording audit findings. Our CASA approved Production Holders and Maintenance Organisations that intend or operate in foreign markets individually or under any future BASA or Technical Agreements. In many contracts, foreign contractors want evidence of CASA audits. "Safety" Findings that are not based on a real safety breach is not harmonised.

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