



2024

Assessment Guidelines
“Experienced” Foreign Licenced
Aircraft Maintenance Engineers

Conditions

LAME Regulatory Responsibilities Matching
Annex 1 compliant Licence
Mature Regulatory Systems
“Years of Experience”



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What are the licence differences under regulatory systems?

Every major regulatory system reviewed, requires the LAME to perform “airworthy control” inspections, ‘final coordination’ and ‘release to service’ functions based on Annex 1, Chapter 4, Annex 8 and Annex 6, Parts 1, 2 & 3.

The differences in foreign approved AMO working procedures and forms are easily understood and have little difference to what is required within CASA approved AMOs.

Foreign LAMEs work within approved AMOs using the NAA’s approved AMO documentation system. Like CAR30/CASR Part 145 company procedures and forms.

With most nations now adopting either the EASR Part 66, TCA Chapter 576 or the FAR Part 65 systems, with all having similar AME training standards, AME licences are more globally transportable today than any previous period; differences may be:

- Company documentation system may vary with supervisory LAME responsibilities being expressed slightly differently.
- Aviation regulatory requirements globally are mostly similar but located in a different legal system with all using approved AMO procedures and forms.
 - A company induction training program will address the differences between a foreign approved AMO and a CASA approved AMO
 - An ‘Aviation Law’ examination, post induction, can test difference in legislative references of the Australian system – used successfully in the past.
- The requirements for LAME HF may differ under different legal systems.
 - This also can be covered by completing a short Human Factor course currently available on-line.
- Employers are the only ones that can identify the technical qualifications, experience applicable to the AMO of a foreign licence compared to a CASR Part 66 licence and/or rating.
 - Some systems add type ratings and others require the LAME to keep records of manufacturers aircraft type training. Same outcome, different processes.

AMROBA contends that the differences are so small that a CASA approved AMO's induction course, continuous and on-the-job training will more than cover any differences with the regulatory administrative process.

- All work is carried out under similar regulator approved maintenance organisation procedures and forms. AMO approvals are modelled on the Annex 8 standards.

Foreign LAMEs currently servicing/maintaining similar aircraft in their own country, who have appropriate experience and qualifications within their country, should be fast tracked to overcome the critical shortage of LAMEs.

Employers are the only ones that can authorise what their employees can do and which ones hold supervisory, certification responsibilities on behalf of the company. Employers are not going to appoint someone that is not competent to safely certify aircraft maintenance and release aircraft to service on behalf of the AMO.

We realise that CASA will come under pressure from Part 147 MTOs and probably the ALAEA and other unions.

LAME Fast Track Proposal

The ability to fast track experienced foreign licenced aircraft maintenance engineers is not available due to red tape applied by CASA.

CASA system of assessing is flawed, in the opinion of maintenance employers, and prevents experienced foreign LAMEs from coming to Australia, even in the short term.

CASA's flawed system is based on having CASA nominated Part 147 training organisations assess the **basic engineering training records** of a foreign LAME, on behalf of CASA, and then identifying, in their opinion, the additional basic training required to be completed before attaining a CASA Part 66 licence. Some have been told to completely do the full training. An insult.

Note: The basic training qualifications is not what needs to be assessed, it is the immediate past experience and employment records.

CASA do not require LAMEs to maintain their academic qualifications to keep their Part 66 licence current. CASRs provides non-academic pathways to obtain a Part 66 licence as do other nations.

What Australia needs is 'experienced' foreign LAMEs now as the Australian training system has not provided LAMEs for other than the airline sector. The government NVET system upgrade is another subject.

Recommended System – Fast Track.

All 22 nations on the ICAO Council include in their regulatory system the responsibility of a LAME to sign the maintenance release and certify aircraft as airworthy post maintenance. The top ten have been reviewed online and all are compatible, including the EASA system.

Their systems all have approved maintenance organisations and requirements for their LAME to use the AMO documented procedures and forms. The same types of aircraft used in many of those countries are the same types used in Australia. The mature aviation nations do not have a safety issue related to their AME licencing system.

Amplification –

Fact: Foreign regulatory systems are as safe or safer than the Australian civil aviation regulatory system. Most have a younger average age than Australia.

Basis: Based on the CAA(NZ) LAME fast track system for foreign LAMEs, we propose CASA adopt a similar system based on CAR30/Part 145 owner, C/E and/or EM carrying out the assessment of the foreign LAME experience and, if acceptable for employment, provide CASA with their assessment.

CASA MA: Based on the AMO “experience” assessment and post induction training by the CAS30/Part 145 AMO, CASA issue a maintenance authorisation to certify completion of maintenance locked to employment with the CAR30/Part 145 AMO.

CASA Part 66 licence: Based on 3 months employment with a maintenance authority and the successful completion of an “AirLaw” examination, a Part 66 licence can be issued including and “ratings” held by the foreign LAME.

Fast Track Proposal - Licences

CASR Part 66 licences and sub-licences, based on EASR Part 66 licences, are not used by all nations but that should not be used as a restriction on whether the foreign LAME has the experience to meet CASR Part 66 licences.

For instance, the US FAR 65 system provides qualified AMTs that can only certify & supervise maintenance if they have been supervised by another experienced AMT as assessed as capable of supervising. Under this system, they also utilise an Inspection Authorisation to perform annual inspections or be part of an AMO’s Inspectorate Division for quality control, there are some very experienced mechanical AMTs that satisfy B1.1, B1.2, B1.3 or B1.4 experience requirements.

- Has the ‘foreign’ LAME been returning the specific aircraft types to service covered by a CASR Part 66 licence or sub-licence?
- Is the experienced foreign LAME specialised in one of the B1 licence subcategories?

- A FAA AMT, or similar licence, with experience in maintaining and supervising helicopters or aeroplanes maintenance, including release to service, should be processed the same as a EASA based system Part 66 licence or sub-category holder.
- AMOs in Australia, like every other mature aviation nation, basically have the same aircraft maintenance approvals, so foreign employer's AMO approvals are crucial to review during employment assessment.
- Type courses completed and used by the foreign LAME, whether the foreign system uses a licence rating system or not, should be added to CASA maintenance authorisation and/or licence issued.

Fast Track Proposal - Experience

The only person that can define whether a foreign LAME has the necessary technical knowledge and experience to fulfil the needs of the approved AMO is the employer. It is experience that must be assessed.

- Employers do not employ workers unless they hold the qualifications and experience the employer needs.
- Only the employer knows the qualifications and experience that are required to fulfil the business job requirements.
- All employed LAMEs (Australian or foreign) must use the employer's approved documented system and forms post induction training.
- Employer recommendations post induction training, to CASA for the issue of a maintenance authorisation should be all that is required.
- Transition to a CASA Part 66 licence would be dependent on passing a CASA "Airlaw" examination after 3 months experience working with the same employer.
- Employers currently do the assessment to employ an Australian LAME, many not meeting the skill, experience or knowledge levels of the helicopter and small aeroplane sectors.

Fast Track Proposal – Transition Process – employers take responsibility

Australia's current formal aircraft maintenance engineer training system is not as in-depth as that applied by many other mature civil aviation nations.

Who should take initial responsibility as to whether a prospective aircraft maintenance employee has the experience and qualifications to be hired and fast tracked to an Australian Part 66 licence?

Most employers that we have approached, state that only they can make that assessment.

Accepting that all mature nation's AME licencing system licences personnel to release aircraft to service and certify aircraft as airworthy after maintenance, it is the approved AMO's procedures and forms that vary, mainly in format.

AMOs performing the assessment, will work cohesively with CASA to initially issue a maintenance authority to sign maintenance but not release aircraft until they pass an Airlaw examination to obtain a Part 66 licence.

CASA Approved AMOs

Employers, though desperate for LAMEs, wouldn't go through Australia's costly immigration process to offer work to a foreign LAME unless they were sure the foreign LAME had the knowledge, experience and foreign qualifications to:

- a. Perform the maintenance the organisation requires and sign for that maintenance;
- b. Supervise and provide the 'airworthy control' of maintenance being performed; and
- c. Once completing the company's induction training, be capable of releasing aircraft to service on behalf of the AMO.

Note: *The company's induction training includes using company/government documentation used by the company, procedures and forms.*

AMROBA recommends that CASA should issue an equivalent AME Licence to that held by the foreign LAME with a condition that he/she can only exercise the privileges whilst employed by the sponsoring AMO for a minimum of 6 months. Restricted to working with approved sponsoring AMOs for two years.

Comparisons

Both the FAA & EASA systems utilise separate inspectors (inspectorate/support staff), within an AMO, to perform airworthy control inspections whereas others, like Canada, require 'authorisations' issued by the AMO to LAMEs to enable them to provide 'airworthy control inspections' and 'sign maintenance releases to service'. Holding a licence is an initial qualification in all mature systems.

The criteria for employment are that the LAME, from whatever system, has experience, as a LAME, in the maintenance disciplines on the specific aircraft they maintain, and needed by an Australian AMO employer. That is, to certify completed maintenance, to provide airworthy control (certify as airworthy), final coordination/certification and to be authorised by the employer to sign the maintenance release, however called.

Every LAME in mature aviation nations fully understand these functions as there is little to no difference to what is applied in Australia. An AMO's induction training addresses, or should, these functions.

The only difference, if any, is the AMO's paperwork system used to meet the national aviation law.

What are the difference between countries?

1. **Admin aviation law** differs in each nation even when one nation's system is based on another nation. This is one subject where a foreign LAME would need to complete an on-line, written or oral examination.
2. **Human Factors** may be another area where training may be needed to be completed to obtain a CASA part 66 AME licence.
3. **Design Standards** of aircraft, Parts 23 and 25 aeroplanes and Parts 27 and 29 helicopters may be an area to be added to the training so the LAME can certify as airworthy – i.e., complies with design standards.
4. **FAA AMT** (Aircraft Maintenance Technician) is a multi-skilled AMT covering 5 categories, (airframe/engine/electrical/instrument/radio). Their depth of complex avionic systems may not be to the same standard as the B2 licence. The mechanical training is compatible to the B1 mechanical depending on whether the AMT has work experience on large aeroplanes, helicopters, small aeroplanes, etc.
 - a. A FAR regulatory provision prevents the AMT doing LAME functions unless previously supervised by an experienced AMT.
 - b. Log of employment/experience is critical when determining experience and knowledge of an AMT to meet the B experience requirements for employment.
5. **EASR A1-4/B1.1-4/B2/C** licencing system is based on an avionic and mechanical system, basically split by aircraft design standards and piston/turbine engines, that has been adopted by many nations, including Australia. Though Australia adopted this system, the current regulations are based on a redundant EASA early version of the EASR part 66 licence system.
 - a. Many nations that have adopted EASR Part 66/147 have training establishments that have partnered with EU approved training organisations providing both national and EU accepted qualifications.
 - b. South Africa, India and many Asian nations have also adopted EASR Part 66/147. These should all have near to compatible training and qualification standards and should be automatically accepted.
6. **Canadian AME** is an avionic and mechanical system similar to NZ. They include a "Structure" stream that is in the ANZSCO chart. Australia needs to adopt the Canadian "Structures" AME regulatory provisions because they are not being used correctly in the Australian system since adopting the EASR system.

Australia has not focused on harmonisation that removes differences to ease recognition of personnel.

Employer Employment Responsibilities

The underlying component of the selected points, that may be also emphasised, is the very real responsibility of the Person Conducting a Business or Undertaking “PCBU”.

Aside from our CASA responsibilities, the PCBU has an obligation, probably higher in Australian law than CASA, to conduct their business in a way and agreed to by the Company Directors that is fit and proper, the employer.

The role of the Aviation Insurance business is not taken into account, all companies must have an insurance policy, to conduct business. Sole Traders are not obligated by law.

These points, have a very high component of risk management included, and is a big part of what and how we conduct business.

CASA no longer seems to take into account our responsibilities as the PCBU and their managing of the Accountable Managers role in the business, rather than in a MoM/MoS.

Employers, under WHS regulations must employ persons qualified and experienced, or provide the experience, prior to authorising the employment in various supervisory positions.

Employers that have interviewed these highly talented and experienced foreign LAMEs are convinced they fully understand certifying for maintenance, airworthy control and release to service functions within an approved maintenance organisation using the AMO’s documentation.

- The responsibility to provide airworthy control functions/certifications have minimal differences, no matter which regulatory system that the foreign LAME worked in.
- The coordination and final certification prior to returning/releasing/signing a maintenance release, however called, have minimal differences globally.
- Employer induction training addresses all these issues including the AMO documentation used by the AMO to meet these global standards implemented in CASRs.

Employers are willing to provide induction training of the foreign LAME they are employing and forward the results of the induction training to CASA so an equivalent authorisation or licence can be issued, based on the experience of the foreign LAME and not on whether the initial training meets CASA training standards to obtain an initial AME licence.

It is the Australian employer that takes responsibility for all their staff they employ in remaining compliant with requirements at the highest safety level possible.

AMROBA recommends this process to CASA to overcome the shortage.