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Economic Forecast

AMROBA is not qualified to make any economic forecasts, but other bodies are, and they are not favourable for growth. Aviation activities are sensitive to government economics decisions and the associated ups and downs.

- "**IMF** downgrades Australia's economic growth forecast for 2026 after major warnings from RBA, Deloitte Access Economic."
- "**AIG** identifies the Australia's economy is highly exposed to the global energy crisis, and even with an imminent end of military hostilities in the Gulf will face a long tail of negative impacts over the remainder of 2026.
  The economy is already suffering from first-order inflationary effects resulting from surging fuel prices. Policy support has blunted the impact, but households and industrial sectors have initially been the hardest hit."
- "**Asia-Pacific General Aviation Market Outlook, 2029- "**Advancement of Air Taxi and Urban Air Mobility (UAM): The challenges of urbanization and traffic congestion in major metropolitan areas are fuelling the demand for air taxi services and electric vertical take-off and landing (eVTOL) aircraft. Countries such as China and Japan are leading the charge in developing urban air mobility (UAM) solutions."

Current Economic Direction Effects

When Australia's economy has tightened in the past, civil aviation has been one of the first industries to feel the pressure but also one of the first industries to recover.

Quite often, aviation emergency services are called upon during these periods as our floods and fire seasons don't seem to care if there is a downturn or upturn.

Currently, government does not have a civil aviation red tape reduction program which is essential to grow and expand civil aviation technical activities as well as operations activities. Red tape reduction should remove duplication with requirements required by other Australian legislation/regulation.

*"**Red tape reduction is the process of removing or simplifying excessive, outdated, or unnecessary government rules, regulations, and bureaucratic procedures. The goal is to lower compliance costs, save time, and boost productivity for businesses, individuals, and public workers without losing vital protections for health, safety, and the environment**."*

Government Policy: "***Overlapping regulation and incompatible regulatory systems create confusion for individuals and businesses, duplication of effort for regulators, and can reduce the effectiveness of managing risk. 'Stability' is enhanced, and unnecessary complexity is minimised by ensuring new regulation is considered in the context of, and is integrated in, existing regulatory systems.**"

Aviation industry sectors need this "Stability" to be applied to aviation regulations.

Red Tape Reduction Ideas

***Government**: 'The goal is to lower compliance costs, save time, and boost productivity for businesses, individuals, and public workers without losing vital protections for health, safety, and the environment."*

"*Lowering costs, save time, boost productivity*" opens a complete review of our dated regulatory system. These government priorities place a completely new appraisal of regulations made over the last couple of decades.

Integration

Integrating aviation requirements into existing regulatory systems would remove unnecessary duplicating regulations by simplifying requirement but enhancing safety.

WHS Requirements

Work health and safety laws are applied uniformly across Australia, to ensure that all workers get the same standard of health and safety protection, regardless of the work they do or where they work. If you are a registered business, the employer must:

- provide a safe work environment.
- ensure safe use, handling and storage of machinery, structures and substances.
- make sure your facilities are well-maintained and at an acceptable standard.
- give your workers any information, training, instruction or supervision needed for safety.
- keep an eye on the health of workers and conditions at your place of work.
- keep an injury register.
- have a workers' compensation policy and a return-to-work plan.

There is no need to duplicate, just refer to the WHS requirements and other business regulations. Aviation businesses are no different than other similar businesses in the motor or marine sectors of transport.

Training

"*A partnership approach is vital for navigating workforce demands and the development of skills and training in Australia*, **Federal Minister Andrew Giles**."
"*The scale of reform in Australia's post-school education and training system in recent years has been significant: a National Skills Agreement and establishing Jobs and Skills Australia, Jobs and Skills Councils, a new Australian Tertiary Education Commission, free TAFE, enhanced workplace delivery of foundation skills and much more.*" **Dr Smith said**

Aviation regulations relating to maintenance personnel training and licencing need to be integrated into Australia's National Education Vocational Training Regulatory System.

Our members have been waiting for this to happen since 2007.

Individuals, Registered Businesses and Trade

The disconnect between aviation regulations and trade training regulatory systems is a disgrace on what was once globally recognised trade qualifications based on ICAO trade training standards for individuals and training organisations.

Conclusion: Aviation regulations are "o*verlapping regulations and incompatible regulatory systems with unnecessary government rules, regulations, and bureaucratic procedures."*

Political parties have been made aware of this for decades, but no political solutions.

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AMO – Part 145 or Not

Australia needs to determine which system, US FARs or EU EASRs, they adopt to underpin CASR aircraft maintenance organisations (AMOs).

Australia is not a world leading civil aviation nation with world leading regulations.

Over the last 20 years, adopted regulations have been based on supporting employment within government, not simplifying regulations for the industry.

Currently Part 145 is, once again, **partially adopted** from the EU AMO system.

It is this partial adoption and failure to remain harmonised with adopted regulations that has caused so much red tape and overlapping incompatible regulations in civil aviation that in some cases, overlaps other Australian regulations causing confusion for businesses.

Current AMO regulations were based on EU EASR Part 145 but not kept harmonised, nor was the full EASRs adopted by omitting small business AMO regulations.

EASA and the FAA realise that a Part 145 AMO does not fit all, so they have promulgated alternative simpler approvals to the regulatory system for general aviation.

EASA's CAMO/CAO organisations system should be adopted as part of implementing harmonisation processes with EASRs AMOs.

Whilst the two of the most mature aviation systems are simplifying their systems to encourage general aviation, Australia lives in the past. Regulatory responsibilities are being transferred to industry businesses/individuals to simplify both manufacture and maintenance.

Safety has not been compromised by either of the world's leading regulatory systems.

Aircraft maintenance is a crucial part in the safety of aircraft that does not get government priority in the transport sector.

The FAA reviews, discussed further in the Summary, page 5, identified accident/incident involvement of maintenance issues. The FAA recommendation:

> *"Irrespective of educational background, all **aircraft maintenance personnel must undergo a very comprehensive technical training that provides the necessary knowledge, skills and attitudes for assuming responsibility over the maintenance of aircraft**."*

Both the EASR and FAR maintenance organisation requires trained and qualified personnel.

There is no requirement for Australian maintenance personnel, employed by a maintenance business, to undergo comprehensive technical training.

Registered businesses that are also approved as an AMO by CASA, have civil regulatory responsibilities to provide applicable training for their staff.

WHS penalties are rather severe for management that does not meet WHS requirements.

Both the EASR and FAR AMO systems are multi-layered and not one size fits all.

Harmonised AMO regulations with the FAA should be a high priority for General Aviation .

Simplifying Parts 21, 22, 145 by Adoption of EASA/FAA regulations

FAA MOSAIC Rules Simplifies Light Aircraft Manufacture and maintenance
Part-CAMO & Part-CAO Organisations – Aircraft Maintenance Programmes (AMP) | EASA
EASA Part 21 Light Rules Simplify Sport Aircraft Manufacture
EASA Maintaining Your GA Aircraft

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Why won't Government Provide Global Trade Skills/Licences?

There is a critical shortage of aircraft maintenance personnel since CASR Part 66 licences were introduced in 2007 because:

1. **All EASA's Part 66 licences were not and still haven't been adopted.**
2. **EASA's training course standards for each licence haven't been adopted.**
3. **After 29 years, there are no NVET courses for other than airline aircraft licences. No helicopter or non-pressurised aeroplanes basic training courses.**

CASR Parts 66/147 were partial adoptions of EASR Parts 66/147 that did not include crucial training course requirements specified in the EASRs.

NB: CASR in Black, EASR standards not adopted in red still need to be adopted

Sector		CASR Part 66 licence	EASR Part 66 licence	Part 66 Specific Module*	NVET Course	EASA Course Durations
Mechanical	Aeroplane (press)	B1.1	B1.1	11A	Diploma	2400 (50/60)**
	+Complex aeroplanes	Nil	Group 1			
	Aeroplane (non-press)	B1.2	B1.2	11B	Nil	2000 (50/60)**
		Nil	Group 2a			
	Helicopters Turbine powered	B1.3	B1.3	12	Nil	2400 (50/60)**
		Nil	Group 1 Group 2b			
	Piston powered	B1.4	B1.4	12	Nil	
		Nil	Group 2c			
Mechanical /avionics	Aeroplane (2000Kg)	Nil	B3	11B	Nil	1000 (50/60)**
Avionics		B2	B2	13/14	Diploma	2400 (50/60)**
		Nil	B2L	13/14 (Prog)	Nil	1500 + Systems Hrs

**** Theoretical/Practical Training Ratio (in %)**

ICAO supports competency-based training. These EASR recommended course durations also meet ICAO & NVET training course duration requirements.

Government Corrective Action: either

- Abandon the EASR AME training/licencing system for other sectors than the airline sector and adopt the US FAA AMT and Repairman system, **or**
- Fully embrace the EASR Part 66/147 licences & training system.

What Has Not Been Adopted from EASR Part 66 by Government has Limited Maintenance Personnel Career Training Pathways in Australia.

1. The EU included a **B3 licence pathway** to assist GA because the standard B1.2 was too broad for aeroplanes up to 2000Kg which encompasses most common aircraft being used in GA and is more comparable to the previous Australian licensing system, especially if the EU Group ratings had also been adopted.
2. In addition, to make the EU licence system work, EASA **added Group ratings** that reduced costs by grouping certain aircraft types.
3. The EU also introduced a B2L avionics system licence which is a basic licence where additional avionic systems can be progressively added as required. Similar to the previous licencing system that worked in Australia.

When will government harmonise with either the FARs or EASRs?

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Summary

Aircraft accidents/incidents studies by the FAA identified issues that Australia is not considering with regards to the skilling of maintenance personnel.

> "*The FAA discussed several studies showing the connection between so-called 'unintentional errors' and incidents/accidents. One study* ***estimated that 40.5% – 87%*** *have these types of errors as a factor; another showed that* ***91% involved human errors****, 33% of which happened during inspection and* ***32%*** *during installation.*
>
> *It has been determined that* ***the most common maintenance errors*** *are incorrect and incomplete installations and that* ***the reasons for these errors are lack of technical training and skills, and inadequate training****, time pressure, lack of communication, and fatigue.*
>
> *Irrespective of educational background, all* ***aircraft maintenance personnel must undergo a very comprehensive technical training that provides the necessary knowledge, skills and attitudes for assuming responsibility over the maintenance of aircraft****.*"

These ICAO Training hours are the basis of the EASA AME Training Course Durations. The Basic Training course hours have been assigned in the EASR Part 147 Appendix.

ICAO AME TRAINING MANUAL Subject matter	*Recommended course duration (hours)*
Chapter 4 Natural science and general principles of aircraft – knowledge (Basic)	**445 total hrs**
Chapter 5 Aircraft engineering and maintenance: Airframe Knowledge (Basic)	**800 total hrs**
Chapter 6 Aircraft engineering and maintenance: Engines/Powerplants – Knowledge (Basic)	**750 total hrs**
Chapter 7 Aircraft engineering and maintenance: Avionics — Electrical and instrument Knowledge. (Basic)	**1350 total hrs**
Chapter 8 Aircraft engineering and maintenance: Avionics — AFCS/Navigation/Radio Knowledge. (Basic)	**785 total hrs**
Chapter 9 Human performance and limitations Knowledge. (Basic)	**30 total hrs**
Chapter 10 Practical maintenance skills: Airframe. (Basic)	**1825 hrs**
Chapter 11 Practical maintenance skills: Engine and propeller. (Basic)	**1000 total hrs**
Chapter 12 Practical maintenance skills: Avionics — Electrical, instruments, autoflight and radio. (Basic)	**3075 total hrs**

Australian NVET 1.2. Nominal duration of the course	**Standard 10.8 for VET Accredited Courses State the nominal duration of the course in hours.**

EASR Part 147 Appendix

The **minimum duration** of a complete basic training course shall be as follows

Basic Course	Duration (in hours)	Theoretical Training Ratio (in%)
A1	800	30–35
A2	650	30–35
A3	800	30–35
A4	800	30–35
B1.1	2 400	50–60
B1.2	2 000	50–60
B1.3	2 400	50–60
B1.4	2 400	50–60
B2	2 400	50–60
B2L	1 500 (*)	50–60
B3	1 000	50–60

Corrective Government Safety Action: *To remove the risk of maintenance errors, government urgently provide NVET training courses, based on European training & course standards, for all aircraft future maintenance engineers/technicians, especially licenced aircraft maintenance engineers by end of 2026 based on the EU course durations based on the ICAO course standards.*

We need government to take corrective action as their public support staff have demonstrated they cannot do it. Many suggest returning regulatory reform to the Minister's Department.

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