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Table of Contents

White Paper Policy to Implementation – If Only 1
Manufacture – White Paper provides Hope 1
Training – White Paper provides Hope 1
NB. EASR 147.B.25 1
What Benefits has Regulatory Reform Provided GA? 2
Positive White Paper Policies 2
Shortage of Maintenance Personnel 3
Another White Paper Policy: 3
Export of Australian Manufactured Civil Aviation Products 4
Manufacture – White Paper provides Hope 4
Why Amend the Act. 4
Appendix A 5

White Paper Policy to Implementation – If Only

Wasting time looking at government White Papers or that's what I thought. If they were to be believed, we as an industry should have hope. Unfortunately, these policies haven't been brought to fruition by the public service.

There are so many governments' White Papers that state good policies, but these policies need to be enacted by government departments and agencies responsible for them.

There are many policies so we concentrated on those that should influence aviation actions and regulation development remembering that policy is only as good as the implementation.

For instance, one White Paper states that CASA is pursuing mutual recognition and international alignment opportunities. Any significant maintenance mutual agreements?

Manufacture – White Paper provides Hope

"CASA is pursuing mutual recognition and international alignment opportunities

International alignment is the act of harmonising, or aligning with, other countries' regulations in local legislation. *This does not require the agreement of the other country and does not guarantee recognition of approvals by the other country."*

- ***Harmonising***, alignment was made with FAR Part 21 in 1998, so why is CASR Part 21 not kept aligned with FAR Part 21?
- Also, **part alignment** with EASR Parts 66/147 was made in 2007 instead of full alignment, so why are CASR Parts 66/147 not kept aligned with EASR Parts 66/147.

Training – White Paper provides Hope

We have struggled to get GA aircraft maintenance training back into the TAFE trade training courses since the airlines demarcation dispute that resulted in mechanical trade being split into "Structures" and "Mechanical Systems" for the airlines.

- ***"improving alignment between CASA licensing and VET qualifications."*** **Wow**

This White Paper policy should be one of the easiest to implement. Alignment of CASA AME standards with VET competency-based training course standards simply needs alignment with EASR Parts 66/147 Parts A and B, especially Part 147 Appendix 1, Course Durations.

NB. EASR 147.B.25 Exemptions regulation policy can be used to exempt Australia's VET Recognised Training Organisations from CASR Part 147 approvals.

AMROBA highlighted how CASA could achieve this White Paper policy by adopting EASR Part 147 Part B .. Implemented correctly, Basic Training would return to TAFE colleges meeting CASA AME personnel training and course standards with VET and qualifications.

ASQA has the responsibility to meet licencing authorities training standards.

What Benefits has Regulatory Reform Provided GA?

The state of General Aviation should, ideally, be a major concern for government.

Government principles/policies of the 1990s have been replaced by White Papers policies but later Departments/Agencies do not seem to have adjusted.

The government's Aviation White Paper sets out long-term policies and actions to guide the next generation of growth and innovation across Australian aviation. ***"Our vision for the future of Australia's aviation workforce is a diverse, skilled and responsive workforce supported by clear training pathways, fair working conditions, and secure* jobs. *Delivering this vision is critical for enabling a growing aviation sector and a strong Australian economy."*** If only government departments/agencies followed White Paper policies.

AMROBA is still waiting for CASA regulatory proposals to comply with this government vision. Parts 66/147 did not comply and neither does the latest Part 43 regulations.

In our Newsletter Volume 18 – Issue 7 July 2021. We stated that "Regulatory Reform/Development Has No End Date" and the latest Part 43 proposal does not comply with the Government's White Paper so how does anyone believe White Papers policies.

This government's "Regulatory Policy, Practice & Performance Framework" policy document promulgated by the *Hon Katy Gallagher, Minister for Finance, Minister for Women, Minister for the Public Service* maybe the reason we get the regulations we do.

"The Australian Government's revitalised regulatory reform agenda is modernising regulation through digital design, innovation, and stewardship to ensure it is fit-for-purpose for Australia and its people."

*"**Vision***

The Australian Government is modernising regulation and improving regulator performance through data, innovation, and stewardship to: ensure regulation is fit-for-purpose in a digital era; protect against regulatory failures; and improve productivity. This Regulatory Policy, Practice & Performance Framework (Framework) supports the Government's commitment to Australian Public Service (APS) reform by building trust in government and its institutions and by putting the community and businesses at the centre of regulatory policy and services."

Fit-for-purpose

"Fit-for-purpose regulation drives competition, productivity, and investment, and protects Australia and its people from harm now and into the future, creating certainty, building trust, and facilitating growth." Neither Parts 66 or proposed Part 43 has or will facilitate growth.

*"**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**."*

When will CASRs fully integrate with Australia's vocational education training system?

Positive White Paper Policies

What governments don't seem to realise is that good policies that need departments and agencies to implement will only happen if the departments controlling Act is amended to direct the department/agency to implement the policy.

We have suffered 34 years of industry uncertainty since 1992 wondering if departments/agencies will implement government policies that seem to be beneficial to GA if implemented as stated in White Papers.

Shortage of Maintenance Personnel

The Government's White Paper stated the following regarding shortages of maintenance personnel. The government stated they are "***streamlining training and licensing arrangements for engineers to address a critical skills shortage in the sector***."

AMROBA has not seen any "streamlining" of the licencing system to benefit GA.

"1. Worker shortages *The industry currently faces shortages of key workers including pilots, flight instructors,* ***aviation maintenance engineers and more****. Shortages of qualified pilots in Australia have had a disproportionate impact on General Aviation businesses and on smaller and regional airlines. With the expected strong growth in the global industry, Australia's aviation sector will face additional international competition for skills.*

So, Government has recognised our dilemma.

(White Paper) Actions from now until 2050

Streamline training and accreditation pathways for licensed aviation maintenance engineers (LAMEs) through*:*

- ***allowing for modular licensing*** *by the Civil Aviation Safety Authority (CASA) of LAMEs with relevant competencies, without requiring completion of the full LAME examination process, [**ed. Partially followed**]*
- ***recognition by CASA of licences from overseas authorities*** *with similar standards and requirements, [**ed. Started**]*
- ***improving alignment between CASA licensing and vocational education and training qualifications." [ed. Not followed for GA]***

NB. Once again, like CASR Parts 66/147 did in the past, proposed Part 43 will further disconnect new maintenance personnel from vocational education and training qualifications.

(White Paper)*: "We are also reforming the visa system to address skills shortages with improved pathways for recruiting qualified personnel from other countries."*

The White Paper provides hope, but regulations produced or proposed quickly negates hope.

Another White Paper Policy:

- ***"improving alignment between CASA licensing and VET qualifications."***

"The Manufacturing JSC, Manufacturing Industry Skills Alliance, (MISA) has established an Aviation Working Group, with representation from industry, unions, training providers and CASA, to recommend changes to the Certificate IV in Aeroskills to provide graduates with a more direct pathway to CASA licensing. The initial scoping project will report later in 2024."

However, CASA partial adoption of Parts 66/147 did not adopt EASR course details. EASR & FARs both set course details that VET pathway courses require. **Stalemate GA licences.**

Why are GA maintenance personnel excluded? Satisfy the airlines and ignore GA.

Proposed Part 43 AMTs seem to be a deliberate attempt to exclude vocational education training qualifications as they did with Part66 GA licenced maintenance personnel.

CASA has never **achieved integration with vocational education training qualifications** since the airline demarcation dispute separated AME mechanical training into mechanical systems and structures prior to the adoption of CASR Parts 66/147.

Obviously, government agencies, CASA/ASQA will not work together to benefit GA aircraft/component employers and maintenance employees.

Airline	Mechanical Systems	Structures	Avionics
GA	Mechanical (includes Systems & Structures)		Avionics

Return to Index

Export of Australian Manufactured Civil Aviation Products

What regulatory changes and international trade agreements for the exports of Australian manufactured aircraft or aeronautical products has government made?

Manufacture – White Paper provides Hope

"CASA is pursuing mutual recognition and international alignment opportunities

Mutual recognition refers to the acceptance of foreign regulatory approvals (such as for licensing, skills, aircraft, medical requirements, training and equipment). With mutual recognition, 2 regulators agree to accept each other's approvals. This can be automatic, where an approval from one regulator is automatically accepted by the other; or manual, where there is a short validation or approval replication process first before other regulator accepts the approval.

International alignment is the act of harmonising, or aligning with, other countries' regulations in local legislation. *This does not require the agreement of the other country and does not guarantee recognition of approvals by the other country."*

Fact: The government, to make White Paper policies happen, need to amend the Civil Aviation Act to add this responsibility to CASA. Either Sec 9 or 98.

Amend Civil Aviation Act

e.g. Add to Sec 9 or 98 "*CASA will actively pursue engineering/maintenance mutual agreements with other nations for acceptance of Australian manufactured aircraft and products and the maintenance of aircraft and products services.*" or similar wording.

Why Amend the Act.

The reason that the Act needs to change is that various governments over the last 35 years have produced needed aviation policies and, at best, included the requirement to implement these policies by giving a Ministerial direction.

Ministers directions hardly get fully implemented because Ministers come and go. Remember that the industry had its own Minister in the past to today being buried within a mega department Ministry. Not even a junior Minister assigned to civil aviation.

- Full Minister attention to no direct Minister attention. Whitlam's Minister Charlie Jones was responsible for bringing aviation under the transport portfolio. Last Minister was Peter Morris, (1984–1987).
- Aviation in Australia no longer rates even a junior Minister, being a transport industry under the Mega Minister for Infrastructure, Transport, Regional Development and Local Government.

How often do we hear government Ministers state the Australian government provides comprehensive support for the export of manufactured products and services.

- Where is the support for civil aviation products and services exports?

Because aviation comes under a unique global treaty that requires export products and services to meet the treaty global standards AND accepted by other nations, usually under a mutual agreement, lack of such agreements affect business capabilities in civil aviation.

Minister King's Address Australian Aviation Conference: "*My focus is on ensuring Australia continues to have an aviation sector that is safe, competitive, resilient and capable of supporting future growth. That's why the Aviation White Paper matters.*

It was the most significant reset of aviation policy in more than a decade. It sets out the Government's long-term plan for a safe, competitive, sustainable, productive and efficient aviation sector through to 2050". Return to Index

Appendix A

"147.B.25 Exemptions Regulation (EU) 2019/1383 (a) The competent authority may exempt a State education department school [system] from: 1. being an organisation as specified in point 147.A.10."

EASR Part 147 Course Durations

All CASA has to do is adopt EASR course durations that align with VET course nominal course duration standards. This will then enable VET courses for all CASA licences courses.

Basic Course	Duration (in hours)	Theoretical training ratio (in %)
A1	800	30 to 35
A2	650	30 to 35
A3	800	30 to 35
A4	800	30 to 35
B1.1	2,400	50 to 60
B1.2	2,000	50 to 60
B1.3	2,400	50 to 60
B1.4	2,400	50 to 60
B2	2,400	50 to 60
B3	1,000	50 to 60

For example, course: EASR *"Module 10 Course Duration*
5 Days *– Each Training day will commence at 09.00 and finish at 17.00"* 40-hour course
All will be funded by DEWR once CASA promulgates thus lowering training costs and providing career pathways.

MISSING B1.2 & B1.3/4 CASA ADVISORY DATA

B1.2 Training Course Knowledge and B1.3/4 Training Course Knowledge requirements.

Pre-CAA Part 66 LAME Clarity

DCA Publication No. 35. Privileges and Responsibilities of Licence Holders.

"4. *The privileges that may be exercised by a Licenced Aircraft Maintenance Engineer include*

- *certification of safety of flight of an aircraft;*
- *certification of documents for the issue or renewal of a Certificate of Airworthiness;*
- *approval of subsequent flight tests;*
- *certifications for issue of an aircraft maintenance release;*
- *certification of work carried out under regular maintenance schedules;*
- *certification after replacement of components; rectification of defects; and maintenance inspections.*

5. The exercise of these privileges involves the acceptance of responsibilities and briefly stated they are as follows:-

- *When work and inspections the Licenced Aircraft Maintenance Engineer must ensure that he/she has adequately supervised the work, that established standards have been maintained and that the resulting condition is satisfactory in all respects.*
- *This means that he/she must satisfy himself/herself that all work or processes leading up to the end result and that which is the product of other approved persons or organisations, have been properly certified.*

7. In performing or supervising work, the LAME is responsible for ensuring work is performed in accordance with the requirements of authorising documents, and the following conditions have also been met:-

(a) Adequate technical data was available and used;
(b) Specialist advice was sought when required;
(c) Appropriate equipment was properly employed;
(d) Properly released (certified) components and materials were used throughout."

Return to Index