



## MAINTENANCE ENGINEER LICENSING (PART 66) ASAP TECHNICAL WORKING GROUP TASKING INSTRUCTIONS and **EIGHTH** REPORT 29 August 2023

The Part 66 Technical Working Group (TWG) is established to operate and report to the Aviation Safety Advisory Panel (ASAP) in accordance with the Terms of Reference of the ASAP dated November 2021 (or as amended).

### PURPOSE

The role of the TWG is to provide relevant technical expertise and industry sector insight for the analysis and review of Civil Aviation Safety Regulations (CASR) Part 66 and Manual of Standards (MOS) in accordance with the agreed policy principles listed below:

- provide industry sector insight and understanding of current needs and challenges
- provide current, relevant technical expertise for the development, analysis, and review of legislative and non-legislative solutions to the identified issues
- assist with the development of draft regulation, guidance materials and other supporting materials
- provide endorsement and or conditional endorsement of draft regulations, guidance materials and other supporting materials for consideration by the ASAP and CASA
- consider whether there are any related opportunities for improvement to CASR Part 147 (Maintenance Training Organisations) to ensure Part 147 is entirely compatible with Part 66 and provides complementary set of regulations.

### TWG OUTCOMES

The project has three key components:

1. **Legislation.** Review and recommend changes to the Part 66 regulations and MOS, to achieve the policy outcomes.
2. **Licence privileges.** Review and recommend changes to clarify and improve the understanding of licence privileges to achieve the policy outcomes.
3. **Aeroskills training.** To assist, where necessary, in the development of a revised Aeroskills training package by the Aerospace Education and Training Industry Reference Committee (IRC) of the Department of Education.

### TWG MEETINGS

- 6 April 2018
- 30 January and 2 December 2020
- 25 August and 19 September 2021
- 2 May, 26 July, 17 August, 19 November and 9 December 2022
- 7 March 2023 and 5 June 2023
- 29 August 2023



## ROLES AND RESPONSIBILITIES

CASA	TWG Members
<ul style="list-style-type: none"><li>• Organise meetings and workshops, and produce agendas, papers and supporting materials</li><li>• Facilitate meetings and workshops</li><li>• Record insights and findings</li><li>• Communicate openly and consistently with TWG members about project status and issues</li><li>• Respect the time of all TWG members by minimising work required to achieve outcomes</li></ul>	<ul style="list-style-type: none"><li>• Commit to supporting the project objectives and timeline</li><li>• Engage and collaborate constructively at all times</li><li>• Prepare for working group activities by reviewing agendas, papers and supporting materials</li><li>• Provide timely and considered advice in meetings, and between meetings as required</li><li>• Respond to requests for feedback on draft materials within agreed timeframes</li></ul>

## CONSENSUS

A key aim of the TWG is that a consensus be reached, wherever possible, in the finalisation and preparation of advice for the ASAP.

The TWG will be guided by the ASAP Terms of Reference (Section 6 - attached) with respect to determining and documenting consensus.

## MEMBERSHIP

Members of the TWG have been appointed by the ASAP Chair, following ASAP processes.

The Part 66 TWG meeting was attended by:

- |                         |                     |
|-------------------------|---------------------|
| • Mark Thompson (Chair) | • Russell Quinn     |
| • Sheridan Austin       | • Mark Howe*        |
| • Stephen Re            | • Aaron Smith       |
| • Keith Blaik*          | • Darren Barnfield* |
| • Rod Tomlins           | • Mary Brown*       |
| • Steven Wright*        | • Ted Goetz         |

The TWG CASA Lead, Richard Stocker, was supported by CASA senior management and subject matter experts during the meeting.

The ASAP Secretariat was represented by Chace Eldridge.

*\*Denotes members not present in the meeting*



## MEETING SUMMARY

- The purpose of the meeting was for the TWG to review the revised MOS amendment package designed to facilitate modular licensing, with the aim of progressing the package to public consultation.
- Guidance material, developed to assist industry understanding of the modular licensing pathway, was reviewed in detail. The TWG believed guidance material and ongoing education to assist users were important if this pathway is to be well-utilised by industry. Notable points of discussion included:
  - The TWG members queried how previous and existing privileges would be displayed on a modular licence. CASA noted that the only difference on this licence would be the date of issue and committed to clearly outlining this for users.
  - CASA clarified that any exclusion could be issued on a licence where the exclusion was not a core competency of the licence category. This discussion considered the extent of the modular licensing flexibility and the minimum number of modules an applicant should complete before being issued with a licence. The TWG members suggested that all available exclusions be listed in the guidance material and that electrical and instrument system privileges be included in any relevant diagrams and descriptions for accuracy.
  - Some members believed the inclusion of a hierarchy table or matrix that explained the new licensing system, and promoting this through all industry engagement channels, would help industry to understand and implement the policy.
  - The TWG members supported the flexible approach but also believed that industry demands would dictate the number of privileges required for licence holders to be employable.
- The group agreed that maintenance training organisations (MTOs) would need to review the existing units of competency to see how they would align with the proposed modular licences. Changes may also be required to correlate a modular Part 66 licence, which is achieved in a shortened timeframe, with existing MTO and government funding packages that are predicated on students achieving recognised qualifications (such as a diploma) in parallel with their licence. A member queried this further with an example, trying to determine how an individual who achieved a modular licence after 2 years with all relevant privileges they need in their organisation, would qualify for funding if they stopped their training before completing a recognised qualification.
- CASA indicated that in conjunction with the point above they would organise a meeting of all MTOs and relevant CASA subject matter experts, as soon as



practicable, to assist with consensus around which units of competency would be required for each initial modular licence outcome.

- There was agreement that CASA should continue developing any associated implementation tools while the MOS amendment is being finalised given the TWG support for the document.
- The draft MOS amendment was then reviewed in detail:
  - Some TWG members believed sections of the MOS could be written more concisely to make it easier for industry members to understand the provisions.
  - The process for foreign or military licence holders to achieve a Part 66 licence should be streamlined through the modular licensing pathway. Some TWG members stressed the importance of more easily recognising foreign licences and queried what would happen if MTOs stopped facilitating this process. Likewise, the TWG members believed efforts should be made to simplify the process for existing licence holders, who transitioned from the previous licence (CAR 31), to receive modular licences without needing to have their basic knowledge re-examined.
  - The examination and requirements to achieve competency in module 13 were also discussed. It was noted that although the electrical, instruments and radio exams would be separated, all topics covered by the radio exam were also covered in the instruments exam. Thus, the TWG believed the instruments exam could be renamed 'instruments and radio exam'.
- CASA believed service delivery standards would not worsen, even if there was an initial influx in licence applications after the modular licensing pathway becomes available.
- The TWG reiterated the need for effective industry education and engagement as the amendment is implemented. A TWG member suggested a proactive example of this would be highlighting that individuals must still be 21 years old before becoming eligible for maintenance certification. The group felt CASA's Aviation Safety Advisors and other key industry associations should play a role in educating industry and promoting this pathway, particularly highlighting the differences between a modular licence and the current licence. CASA will work with the TWG as education materials and a communications plan are developed.
- The TWG identified some additional concerns for future consideration following the progression of the modular licensing pathway:
  - The TWG members suggested that now electrical, instrument and radio exams have been separated, students could be credited for sections of the



module 13 exam where they have demonstrated the required knowledge, even if they incorrectly answered other portions of the exam.

- Some members provided specific examples where training requirements for engineers did not align with their privileges. For example, currently B2 engineers can certify FADEC systems without having done the specific training for them, whereas B1 engineers complete relevant training as part of their type training but are unable to certify it.
- The TWG also believed that longstanding concerns about the misalignment between the CASA Part 66 syllabus and vocational education training requirements (to achieve recognised qualifications required for government funding packages), could be in part resolved through a memorandum of understanding between CASA and other relevant government departments. They suggested that this initiative must be driven from a senior level.
- In the industry only discussion, members wanted to thank CASA, particularly the involved subject matter experts and senior managers, for their ongoing work and participation in the meeting. The need to bring existing engineers back into the industry was emphasised and the group believed this proposal would support that.

## **PROCESS FOR ACHIEVING CONSENSUS**

As required by the ASAP (& TWG) Terms of reference, there must be agreement by all participants on the method used for obtaining consensus.

To obtain consensus, the TWG will discuss their views on the provided material during the meeting then address the below Outcomes.

The CASA Lead has also provided commentary of the effectiveness of the TWG and whether it is believed that the recorded outcomes are a fair representation of the TWG from a CASA perspective.



## SUMMARY OF OUTCOMES – Eighth TWG Report, 29 August 2023

### A. Does the TWG agree that the MOS amendment package, to facilitate modular licensing, is suitable for public consultation?

**FULL CONSENSUS** / GENERAL CONSENSUS / DISSENT

#### Comments:

The TWG were in full consensus in supporting the MOS amendment package progressing to public consultation as soon as practicable. This recommendation is subject to some small changes to the accompanying materials, including:

- That all 44 exclusions be listed in the guidance material.
- Electrical and instrument system privileges be included in any relevant diagrams and descriptions for accuracy.

The TWG members also committed to working with CASA to ensure the suitability of any communications, implementation tools and materials as they are developed.

The TWG members were comfortable with the MOS progressing to public consultation without change, any TWG or industry feedback can then be considered following public consultation. If CASA makes any tweaks or minor changes to the MOS or guidance material prior to public consultation as a result of this TWG meeting, the TWG members do not feel an additional meeting to review this is necessary. However, the TWG should be kept updated of any changes.

The TWG also recommended that this MOS amendment package be specifically considered by the Part 43 TWG. This will assist in identifying any implications to the Part 43 legislative suite, or change in industry needs, because of this MOS amendment.

Lastly, the TWG members suggested that the relevant MTOs and CASA should work collaboratively to determine what units of competency would make up each modular licence so that there is consistency across the training sector.

#### CASA Lead Summary

**Richard Stocker**

#### Comment:

CASA thanks the TWG members for their time and input on the proposed MOS amendment package.

CASA appreciates the support from the TWG members to progress the proposed



MOS and guidance material to public consultation, with the TWG being informed of any minor tweaks, but without the need to hold a further TWG meeting.

CASA also notes the points of discussion from the meeting and will record and work through any raised issues through the TWG issues register.

## **Appendix**

1. Extract from ASAP Terms of Reference



## Appendix 1

### ASAP and TWG Terms of Reference regarding Consensus (Extract)

- 6.1 A key aim of the ASAP is that a consensus be reached, wherever possible, in the finalisation and preparation of advice to the CEO/DAS.
- 6.2 For present purposes, 'consensus' is understood to mean agreement by all parties that a specific course of action is acceptable.
- 6.3 Achieving consensus may require debate and deliberation between divergent segments of the aviation community and individual members of the ASAP or its Technical Working Groups.
- 6.4 Consensus does not mean that the 'majority rules'. Consensus can be unanimous or near unanimous. Consensual outcomes include:
  - 6.4.1 **Full consensus**, where all members agree fully in context and principle and fully support the specific course of action.
  - 6.4.2 **General consensus**, where there may well be disagreement, but the group has heard, recognised, acknowledged and reconciled the concerns or objections to the general acceptance of the group. Although not every member may fully agree in context and principle, all members support the overall position and agree not to object to the proposed recommendation.
  - 6.4.3 **Dissent**, where differing in opinions about the specific course of action are maintained. There may be times when one, some, or all members do not agree with the recommendation or cannot reach agreement on a recommendation.

#### Determining and Documenting Consensus

- 6.5 The ASAP (and Technical Working Groups) should establish a process by which it determines if consensus has been reached. The way in which the level of consensus is to be measured should be determined before substantive matters are considered. This may be by way of voting or by polling members. Consensus is desirable, but where it is not possible, it is important that information and analysis that supports differing perspectives is presented.
- 6.6 Where there is full consensus, the report, recommendation or advice should expressly state that every member of the ASAP (or Technical Working Group) was in full agreement with the advice.
- 6.7 Where there is general consensus, the nature and reasons for any concern by members that do not fully agree with the majority recommendation should be included with the advice.
- 6.8 Where there is dissent, the advice should explain the issues and concerns and why an agreement was not reached. If a member does not concur with one or more of the recommendations, that person's dissenting position should be clearly reflected.
- 6.9 If there is an opportunity to do so, the ASAP (or Technical Working Group) should reconsider the report or advice, along with any dissenting views, to see if there might be scope for further reconciliation, on which basis some, if not all, disagreements may be resolved by compromise.