Get Covered

Select your coverage based on the aircraft types you maintain and the last completed years annual turnover. If you are just starting out in business, then use your estimated turnover for the first year of business.

Fixed Wing Only | Fixed and Rotor Wing

up to $75,000 | $75,001 to $125,000 | $125,001 to $175,000 | $175,001 to $250,000

Mini	Basic	Plus	Premium (BEST VALUE)	Platinum
$1,085 Per year, AUD inc GST	$1,315 Per year, AUD inc GST	$1,850 Per year, AUD inc GST	$2,125 Per year, AUD inc GST	$2,665 Per year, AUD inc GST
$1,000,000 Combined Limit of Liability	$2,000,000 Combined Limit of Liability	$5,000,000 Combined Limit of Liability	$10,000,000 Combined Limit of Liability	$20,000,000 Combined Limit of Liability
Care custody & Control Sub-limit up to $250,000	Care custody & Control Sub-limit up to $500,000	Care custody & Control Sub-limit up to $1,000,000	Care custody & Control Sub-limit up to $1,000,000	Care custody & Control Sub-limit up to $2,000,000
Property damage excess $2,500 excess	Property damage excess $2,500 excess	Property damage excess $2,500 excess	Property damage excess $2,500 excess	Property damage excess $2,500 excess
Aircraft damage excess $2,500 excess	Aircraft damage excess $2,500 excess	Aircraft damage excess $2,500 excess	Aircraft damage excess $5,000 excess	Aircraft damage excess $5,000 excess
Select this cover	Select this cover	Select this cover	Select this cover	Select this cover

Get Covered

Select your coverage based on the aircraft types you maintain and the last completed years annual turnover. If you are just starting out in business, then use your estimated turnover for the first year of business.

Fixed Wing Only | **Fixed and Rotor Wing**

up to $75,000 | $75,001 to $125,000 | $125,001 to $175,000 | $175,001 to $250,000

Mini	Basic	Plus	Premium (BEST VALUE)	Platinum
$1,240 Per year, AUD inc GST	$1,503 Per year, AUD inc GST	$2,115 Per year, AUD inc GST	$2,429 Per year, AUD inc GST	$3,047 Per year, AUD inc GST
$1,000,000 Combined Limit of Liability	$2,000,000 Combined Limit of Liability	$5,000,000 Combined Limit of Liability	$10,000,000 Combined Limit of Liability	$20,000,000 Combined Limit of Liability
Care custody & Control Sub-limit up to $250,000	Care custody & Control Sub-limit up to $500,000	Care custody & Control Sub-limit up to $1,000,000	Care custody & Control Sub-limit up to $1,000,000	Care custody & Control Sub-limit up to $2,000,000
Property damage excess $2,500 excess	Property damage excess $2,500 excess	Property damage excess $2,500 excess	Property damage excess $2,500 excess	Property damage excess $2,500 excess
Aircraft damage excess $2,500 excess	Aircraft damage excess $2,500 excess	Aircraft damage excess $2,500 excess	Aircraft damage excess $5,000 excess	Aircraft damage excess $5,000 excess
Select this cover	Select this cover	Select this cover	Select this cover	Select this cover

Identity	Coverage	Individual tradesman cover	Australian based	
Shielded insurance Brokerage, about 10 underwriters in Australia, also access to overseas such as Lloyds.	Tradesmen and tradies insurance.	Y	Y	Public and products Custody care and control
Bill Owen insurance Brokerage	Full hangar keepers	Y	Y	Public and products Custody care and control
Ausure Brokerage	Full hangar keepers	Y	Y	Public and products Custody care and control
Benton Insurance	Full hangar keepers	Aviation business cover	Y	Public and products Custody care and control
Agile Insurance	Full hangar keepers	Y Policy already available	Y	Public and products Custody care and control
Aviation Insurance Australia	Full hangar keepers	Y	Y	Public and products Custody care and control
KCB Group	Full hangar keepers	Y	N	Public and products Custody care and control
Avion	Full hangar keepers	Y	N	Public and products Custody care and control
Crombie Lockwood	Full hangar keepers	Y		Public and products Custody care and control
QBE	Full hangar keepers	Y	Y	Public and products Custody care and control
Catalyst	Full hangar keepers	Y	Y	Public and products Custody care and control

BWI	Full hangar keepers	Y	N	Public and products Custody care and control

From: s 22 [redacted]
Sent: Tuesday, 5 July 2022 9:09 AM
To: s 22 [redacted]
Subject: RE: LAMEcover [SEC=OFFICIAL]

Hi s 22 [redacted],

The product we had at the time is still active but its aimed a contracting LAMES working under a CAR30 or Part147 organisation: https://lame.poweredbyagile.com.au/

Im still aiming to have an updated version for independent LAMEs available for the new regs – whats the expected start date?

Kind Regards

s 22 [redacted]
Head of Aviation

Agile Underwriting Services Pty Ltd
s 22 [redacted]
+61 458 120 195
1300 705 031

Gday again s 22 [redacted] and thanks for the chat.
Can you send me the summary of proposed changes and I can consider this ahead of my meeting early next week.

All the best
s 22 [redacted]

---

s 22 [redacted]
Aviation
QBE Australia

Phone: +61 3 86029904 Mobile: 0418 349 415 Fax: +61 3 86029933
Email: s 22 [redacted]
Visit us on the web at http://www.qbe.com.au/www.intermediary.qbe.com.au

Made possible by QBE

Thanks s 22 [redacted] for your prompt reply.

I have asked our Insurance Services Team to review this information and reply to you shortly.

Kind regards

s 22
Client Adviser
VMIA | Risk Management & Insurance
P +61 (3) 92706938 M +61 (4) 08595932
www.vmia.vic.gov.au

From: s 22
Sent: Tuesday, 22 January 2019 10:54 AM
To: s 22
Subject: RE: A general question about hangar keepers insurance [SEC=UNOFFICIAL]

UNOFFICIAL

Hi s 22 . The proposed policies are currently open for public comment. When consultation closes on 31st January, we will move on to drafting the legislation. For the purpose of this conversation, the policy proposals will be sufficient as the rules will only be the legislative expression of these policies. Please see the attached summary of proposed policies and be advised that any likely variations will only be minor.
If it will be of any value, I will be happy to come to your office for discussions.
Regards

s 22
GA Maintenance Regulations Project Leader
Principal Standards Officer, Airworthiness
Airworthiness and Engineering Branch
CASA\Aviation Group
p: +61 2 6217 1184 **m:** +61 439 601 236

Aviation House
16 Furzer Street, Phillip ACT 2606
GPO Box 2005, Canberra ACT 2601
www.casa.gov.au

From: s 22
Sent: Tuesday, 22 January 2019 10:42 AM
To: s 22
Subject: FW: A general question about hangar keepers insurance [SEC=UNOFFICIAL]

Dear s 22

Thanks for your email below and for your follow up phone call today. We apologise for the delay in replying back to you.

We have referred this email to our Insurance Services Team for their review. They have requested further information regarding these proposed aircraft maintenance regulation changes, such as a copy of the new rules know as Part 43.

Could you please provide further details to us in a reply email for our review. Details of the VMIA Hangar Keepers Liability Insurance and Non-Ownership Liability Insurance, including the actual policy wordings can be found here https://www.vmia.vic.gov.au/insure/policies/aviation

Kind regards

s 22
Client Adviser
VMIA | Risk Management & Insurance
P +61 (3) 92706938 M +61 (4) 08595932
www.vmia.vic.gov.au

From: s 22
Sent: Monday, 14 January 2019 2:16 PM
To: s 22
Subject: A general question about hangar keepers insurance [SEC=UNOFFICIAL]

UNOFFICIAL

Good Afternoon.
I would like to arrange a meeting with your principles to discuss how hangar keepers insurance policies may be affected by currently proposed changes to the aircraft maintenance regulations in Australia.
CASA is currently working on a project to introduce FAA-style maintenance regulations in Australia for private and aerial work aircraft. The new rules, to be known as Part 43- maintenance of aircraft in private and aerial work operations, will be incorporated in the Civil Aviation Safety Regulations 1998 (CASR) and will replace the current rules in the Civil Aviation Regulations 1988.
In brief, this will mean that maintenance providers will no longer be required to hold a CASA-issued approval to provide maintenance services. Instead, and in line with the US Federal Aviation Regulations (FAR)s, any CASA-licenced Aircraft Maintenance Engineer (LAME) will be permitted to establish a maintenance business based on the privileges of their licences.
While a LAME may prefer to operate via a company structure, the aircraft undergoing maintenance will be released to service by the LAME, not an organisation. This mirrors the maintenance rules in the USA for all aircraft except those in Air Transport
Regards

s 22
GA Maintenance Regulations Project Leader
Principal Standards Officer, Airworthiness
Airworthiness and Engineering Branch

CASA\Aviation Group
p: +61 2 6217 1184 **m:** +61 439 601 236

Aviation House
16 Furzer Street, Phillip ACT 2606
GPO Box 2005, Canberra ACT 2601
www.casa.gov.au

Key: Resolved | Future action | No action

CASR PART 43 Issues list						
This list of issues captured from consultation feedback						
Issue No	**ISSUE TOPIC**	***ISSUE SPECIFICS***	***REG/MOS REFERENCE***	***RESOLUTION OPTIONS***	***RESOLUTION DECISION***	***COMMENTS***
1	LAME privileges with task assessment	Task assessment and how that will be recorded/documented. When working outside of generic privileges, how much background knowledge/ theory is considered adequate?	MOS Chapter 2		**Resolution - no action** CASA does not propose to prescribe how an LAME must record task accomplishments. The onus will be on the LAME to show proof if requested to do so by CASA or an RO for whom work is being performed The CASA LAME theory examinations provide the necessary basis for most tasks however CASA has prepared a table of licence privileges that sets out the effects of exclusions and subcategory differences with available remedies.	Information sheets and charts are under development to provide clear plain English guidance with diagrams for LAMEs, AMEs and ROs
2	Engine overhaul outside of CASA AMO (145/CAR30)	Showing/maintaining competency for performing engine overhaul for B1 LAMEs working independently of CASA AMO	Mos 4.04		**Resolutions** CASA has: • carved out transport category aircraft • introduced the AMT 1 certificate that will permit non-LAME engine overhaul specialists to continue overhauling engines and releasing them to service • prepared a guidance pack which clearly sets out the legal position relating to LAMEs (and anybody else) who carries out engine overhauls	Information sheets explaining compliance and privileges will be published
3	Other component workshops (repair/overhaul/servicing) outside of CASA AMO	Under Part 43, component work (off-wing) can be performed and certified by Part 66 LAME outside of CASA AMO (145/Car30)	MOS chapter 2		**Resolutions** • CASA does not propose to disallow LAME component maintenance-US industry experience has not highlighted any safety concerns. • CASA has introduced the AMT 1 certificate which will permit existing non-LAME component maintainers to continue to provide their services	
4	Part 145 AMO rules and expectations too onerous and difficult for small maintenance providers	While not directly within the Part 43 remit it does indirectly influence attitudes, decisions and resistance to change (the 145 "bad-taste" syndrome)			**Resolution - in hand** CASA is currently establishing a project to examine a range of Part 145 options including more simplified entry control for GA oriented maintainers.	
5	The inspection "checklist" acceptable for annual inspections doesn't cover the aircrafts routine servicing/ scheduled maintenance tasks	Comments received indicate that some find this approach too simple and not comprehensive.	MOS Schedule 1		**No change proposed** The inspection is the first essential pillar of safety assurance under the FAR-based system. it is not intended to prescribe maintenance-that is set out in the ROs responsibilities in Subpart B of the PDS. The RO is responsible for having the aircraft regularly inspected and having rectifications carried out between inspections. The maintainers' responsibilities are set out in Subpart C. The LAME is required to inspect the aircraft using a checklist based on Appendix D to ensure that the aircraft is (a) airworthy and(b) in compliance with its type certification.	

Key: Resolved | Future action | No action

CASR PART 43 Issues list						
This list of issues captured from consultation feedback						
Issue No	**ISSUE TOPIC**	***ISSUE SPECIFICS***	***REG/MOS REFERENCE***	***RESOLUTION OPTIONS***	***RESOLUTION DECISION***	***COMMENTS***
6	FAR 43 requires sections of FAR 91 to make the regulations "work"	FAR 91 makes the continuing airworthiness responsibilities and management clear to the owner/operator within the operational rules.	FAR 91 Subpart E		**Resolved** Chapter 3 of the P43 MOS incorporates all of the relevant FAR Part 91 provisions	
7	NDT, Welding, MITCOM and Specialist maintenance - Outside of CASA AMO how are these maintenance activities managed, performed, certified /RTS?	People are concerned about the appropriate checks & balances for the independent LAME certifying RTS for these multi-facetted things			**Resolutions** • The LAME is required to ensure that any specialist work for which he or she makes a certification has been carried out to the same standard as would be expected of person holding a formal qualification for the work. • Any work such as welding that is part of a major repair or alteration must be carried out in accordance with approved data and released to service by an IA • CASA has introduced the AMT1 certificate which will permit individuals holding a recognised welding/ NDI etc qualification to continue providing their services and releasing their work to service.	Education and information is to be published for these topics
8	Over-sight and visibility of Maintenance performed under Part 43				**Resolution – in hand** We continue to work with RSST for a surveillance plan that will be proportionate and relevant for the sector in Australia	
9	FORM 337 system – for getting data approved, certifying conformity and RTS after major repair/major mod.	Comments from those that have worked with this system in US or NZ seem to like its clarity and streamlined approach – However, in Australia we already have the 21.M (engineering orders & design advice) systems to manage these CA issues			**No change proposed** of the main functions of the FAA Form 337 are to 1. create a record of the major repair/alteration, 2. provide details of the data that has been used and the means by which it has been approved, and 3. provide the FAA with a record of the work 1. The CASR subpart 21M process provides the same information as provided by 1 above, 2. The mandatory logbook certification and document retention requirements set out in 43.9 provide the same function as 2, and 3. CASA has not held any such records in the past and has no plan to introduce it. The major benefit to ROs and maintainers will lie in the minor repair/alteration provisions. The majority of alterations to small simple aircraft will fall into that category, meaning that data approval is not required (and therefore the Form337 would not be relevant). CASA has published a comprehensive list of acceptable data for this purpose.	

Key: Resolved | Future action | No action

CASR PART 43 Issues list						
This list of issues captured from consultation feedback						
Issue No	**ISSUE TOPIC**	***ISSUE SPECIFICS***	***REG/MOS REFERENCE***	***RESOLUTION OPTIONS***	***RESOLUTION DECISION***	***COMMENTS***
10	IA – Inspection Authorisation	What is it? Why do we need it? Is this to have a new type of independent inspector (to check on our LAMEs in the field?) Are they needed for the Part 43 Annual inspection when carried out at 145 AMO?	FAR 65.91 FAR 91.409		**Resolution - no change** The IA holder is the second essential pillar of safety assurance under the FAR-based system. For maintenance outside of an AMO, the IA inspects each aircraft on an annual cycle to ensure that the aircraft remains in an airworthy condition and in compliance with its certification basis. Inspecting an aircraft against its type certification is not an element of CARs and LAMEs are not trained in the use of the type certification. Similarly, many LAMEs have never been involved in major repairs or alterations and will have little knowledge of conformity inspections. It is for these reasons that an IA holder is required who has demonstrated an understanding of these functions.	
11	Education for owners/operators	The RO responsibilities for operating AIRWORTHY aircraft that comply with cert basis needs to be taught and demonstrated clearly for the new rule set.			**Resolution – in hand** The policy of who is responsible hasn't changed from CAR, however the need to educate ROs in their responsibilities is understood by the project team and planning is under way to deliver training sessions around the country along with development of information sheets	Information sheets and education seminars will be used
12	Current CAR 30 holder businesses being "disadvantaged" by new competition	Many are concerned of all they have invested into obtaining the CoA is going to be "for nothing" and competition from "new individuals" will put them out of business and be unfair (and unsafe?)			**Resolution** As pointed out in the recent 43 risk workshop, the individuals within current CAR 30 approved facilities are the ones that feel the most threatened by Part 43 and yet, ironically, also have the most to gain in terms of flexibility and business opportunities. CASA has removed scheduled maintenance of transport category aircraft from independent LAME maintenance privileges.	
13	Need for LAME insurance for individual's (for employees and self-employed)	Under the current CAR 30 CoA the LAME will always sign "for and behalf of …"			**Resolution – in hand, ongoing discussions** Individual's liability insurance is already available from at least 1 underwriter and discussions with other underwriters are ongoing	CASA will publish details of available insurance options for independent LAMEs
14	Aircraft that move between GA/AWK and Air Transport operations	Will the Part 43 certifications be considered acceptable to the operator/Part 145?			**Resolution** In some cases the operator/Part 145 will be required to carry out an airworthiness assessment (airworthiness review) of the aircraft records before entering into Air Transport operations.	
15	Licenced Engineers moving between Part 43 and Part 145 – what about competency & privileges gained through task assessment?	Can this experience be acknowledged within P145 and vice-versa?			**Resolution** Experience in performing a specific task whether gained in an AMO, or formal training will satisfy the Part 43 task-based competency provisions. An AMO may take any LAME experience into account in accordance with its procedures	Further guidance will be set out in information sheets

Key: Resolved | Future action | No action

CASR PART 43 Issues list						
This list of issues captured from consultation feedback						
Issue No	**ISSUE TOPIC**	***ISSUE SPECIFICS***	***REG/MOS REFERENCE***	***RESOLUTION OPTIONS***	***RESOLUTION DECISION***	***COMMENTS***
16	Aircraft records and traceability of parts/materials	During consultation it is evident that many understand Part 43 to be a lower airworthiness standard, however for type-certified aircraft the policy for records, RTS and traceability remain the same. (not optional)	MOS Chapters 3 and 4		**Resolution** A person releasing a component to service in Part 43 is required to comply with the requirements to understand the manufacturer's instructions for the task and comply with the requirements set out in 43.9, 43.13, 65.81and 65.82 In effect, this is no different to component maintenance under any other regulatory structure	Penalty provisions will apply with regard to the requirements specified in 43.9, 43.13, 65.81 and 65.82 Information sheets will set out the responsibilities of LAMEs and AMTs
17	Use of the CASA Maintenance Release (Form 918) under CAR 43	Our industry has an understanding and appreciation of the CASA 918 maintenance release form which works well as a Tech Log/ Flight Log system for small aircraft			**Resolution – no change but discretion allowed** The CASA MR will not be mandated however use of the MR will meet or exceed the requirements of 43.9 and 43.11	The MR is not suitable for all types of operations however by making it discretionary, CASA has provided industry with the option to use the format which best suits their needs
18	Acceptable data is a new concept for our industry. CASA current rules only ever talk about using data that is APPROVED.	Data found to be acceptable by the LAME can be used without further showing or approval if the mod or repair is minor. Acceptable data is basically technical data that has a generic approval			**Resolution** Acceptable data for use in minor maintenance will reduce compliance burden on the GA industry. CASA has prepared a list of acceptable data however any data that meets the relevant regulatory requirements (the principle one being that the airframe, aircraft engine, propeller, or appliance worked on will be at least equal to its original or properly altered condition (with regard to aerodynamic function, structural strength, resistance to vibration and deterioration, and other qualities affecting airworthiness).	The CASA information sheets will cover this topic in detail CASA has now produced AC43-04 – Acceptable maintenance data
19	Defect reporting to CASA of GA aircraft	Part 43 doesn't have any specific rules for reporting of service difficulties/defects to CASA (neither major or minor) In FAR 135.415 are found the rules for reporting of failures, malfunctions, defects to the FAA.		Retain CAR 51 & 52 & 53 for the mandatory reporting of major defects to CASA Or, allow for no mandatory reporting of defects to CASA under Part 91(private) ops	**Resolved** Part 43 will require the: • RO to report major defects to the manufacturer and CASA. • Maintainer who becomes aware of any defect to report it to the RO.	
20	Task based competency assessment	TWG requests modification of the 'Overview' in the PDS to incorporate some			**Resolved**	Note: This provision is necessary to provide for LAMEs who have

Key: Resolved | Future action | No action

CASR PART 43 Issues list						
This list of issues captured from consultation feedback						
Issue No	**ISSUE TOPIC**	***ISSUE SPECIFICS***	***REG/MOS REFERENCE***	***RESOLUTION OPTIONS***	***RESOLUTION DECISION***	***COMMENTS***
		detail around LAME privileges (65.82) and explaining that a LAME would have needed to be deemed competent by another LAME and that this information needs to be recorded somewhere such as a diary or SOE.			CASA has amplified the statement "previously performed the task" to say: previously satisfactorily performed the task in accordance with regulations in force at the time	been lawfully carrying out maintenance tasks under CARs or CASRs. It is not CASAs intention to require that all of these people re-establish their competencies.
21	Inspections	Remove the requirement to immediately notify CASA should the progressive maintenance inspection be discontinued.			**Resolved** The requirement has been struck out.	
22	Progressive inspections	In the Summary of variations document under the topic 'Inspections' (on page two), item (2) Incorporated CASA progressive inspection schedule as set out in paragraph 2.5 Schedule 5 of CAR. The TWG agreed that this required re-wording as it is not Schedule 5.	Now MOS Schedule 2		**Resolved** CASA has added an explanation that the staged inspection set out in paragraph 2.5 of Schedule 5 will be promulgated under Part 43 as an acceptable means of compliance with the requirements of 91.409(d)	
23		Ensure the definition of 'Supervision' is contained in the Policy document			**Resolved** The following has been added to subpart A - Definitions *Supervision* means: The person supervising must personally observe the work to the extent necessary to ensure that the work has been carried out properly and be readily available in person for consultation during the maintenance.	
24		CASA to provide clarification on the requirements associated with being deemed competent by another LAME on a task. Eg, if you've done the task once you're good to go….. What does this actually mean and how does the person prove they are competent?			See issue 20. This is essentially the same concern.	
25		Provide further clarification around what would be required to move an aircraft from Part 43 into CAR30 (or equiv) to enable Charter or Air Transport ops.			**In process** The broader picture of charter/part 135 continuing airworthiness requirements are the subject of a separate project MS 17/03.	

Key: Resolved | Future action | No action

CASR PART 43 Issues list This list of issues captured from consultation feedback						
Issue No	**ISSUE TOPIC**	***ISSUE SPECIFICS***	***REG/MOS REFERENCE***	***RESOLUTION OPTIONS***	***RESOLUTION DECISION***	***COMMENTS***
26		Manage expectations of industry around cost and the benefits of Part 43. That is, the costs will most likely not be reduced for RO's, rather the costs may be reduced for the maintenance operator and not be passed onto RO's. The real benefits however are actually about flexibility.			**No action** Previous consultation documents have clearly stated that one of the targets is that, as much as possible, changes should be cost neutral or provide savings for the general aviation and aerial work sectors CASA does not feel that this is a misleading statement in this form.	Note: Savings to ROs will accrue with the removal of a blanket requirement (under CARs) to comply with manufacturers recommended maintenance intervals and retirement times. Under the FARs, ROs are only required to comply with FAA-approved AWLs and ADs. While not all ROs will be able to take advantage of this cost saving measure, it nevertheless will be an available option for the sector.
27	Loss of LAMEs	The expanded LAME privileges under Part 43 will undermine the Part 66 licensing system. Also the availability of AMTCs will be a disincentive for individuals to obtain a Part 66 licence			**No Action** The Part 43 expanded privileges are not usable for maintenance under CAR or Part 42. Therefore the Part 66 licence will remain the only licence pathway. AMTCs will not dis[place LAMEs, they will supplement Part 66 LAMEs in areas of special skills requirements, in continuation of maintenance authorisations under 42 ZC of CAR	
28	FAR IA issued for 2 years	2-year duration is a costly impost on LAMEs....should be 10 year renewal cycle	MOS Chapter 2		**Resolution** IA duration set to 5 years	The likelihood of an IA holder skills loss over a 5-year period is unlikely to be significant.
29	IA renewal requirements excessive for Part 43	FAA IA holders in Australia struggle to meet the activity requirements for renewal			**Resolution** The number of required annual inspections reduced from 4 to 2	This is considered more proportional for the reduced scope of Australian IA which does not include any air transport maintenance
30	Loss of income	B2 LAMEs are concerned that they are being marginalised and will suffer loss of income	Chapter 2		**Resolution** A B2 LAME will no longer be required by legislation to carry out routine inspections and minor avionics maintenance in private and aerial work. This is in keeping with FARs. CASA has partially mitigated the impact of the changed rules by introducing the Avionics IA and permitting a B2 LAME to carry out preventive maintenance	
31		Removing category restrictions for certifying work between helicopter and fixed wing is a very dangerous thing. It will lead to dropping safety standards and the losing the accountability provided by the AMO system			**No Action** Expanded privileges are competency based. The requirement is for the LAME to have the underpinning knowledge and couple it with supervised task performance.	
32		CASA should remove the requirement to have a B2 LAME carry out annual inspections of IFR equipment on ABE aircraft (CASA SCHED 5). This would align			**Resolution** B2 certifications are not required for scheduled inspections or minor avionics maintenance	

Key: Resolved | Future action | No action

CASR PART 43 Issues list						
This list of issues captured from consultation feedback						
Issue No	ISSUE TOPIC	*ISSUE SPECIFICS*	*REG/MOS REFERENCE*	*RESOLUTION OPTIONS*	*RESOLUTION DECISION*	*COMMENTS*
		with advice provided elsewhere in this consultation that a B1 LAME may carry out these items for other certified aircraft				
33		The requirement for an avionics IA holder to carry out major electrical repairs or modifications would mean loss of existing B1 privileges.			**Resolution** Major electrical repairs and alterations have been reinstated as a B1 privilege	
24		The need for a B1 Lame to undertake an exam to attain an IA should be removed or if the B1 LAME can prove they have issued a number of maintenance releases and/or they are a chief engineer of a maintenance organisation then they would qualify to automatically receive an IA.			**No action** The training is required to cover a gap in LAME training with regard to aircraft type certification basis.	
35		need to clarify the IA requirements, as in one section it is mentioned an exam is required for B1 Lame and in another information section it is mentioned a CASA on line course will be provided to obtain the IA			**Resolution** Completion of the CASA provided on-line training course is the requirement.	
36		All cat "C" LAME should automatically be granted IA			**No action- CASA disagrees**	
37		The 3 year wait for a LAME to become an IA seems harsh. It would be better to have a task completion milestone, eg conduct at least 2 annual inspections under supervision on all-aluminium airframes, and same for all-fabric, all-composite, and all-wood-fabric airframes if the student wishes. Most will just to the more common all-aluminium option only			**No action** **CASA disagrees**	
38		Considering the IA becomes an equivalent to a Maintenance Controller/Job Co-Ordinator (C category holder), I believe the time B1 or B2 Licence holders should have held their privileges should be increased to at least 5 years before being able to hold an IA.			**No action** The FAR requirement is 3 years, there is no justification for setting a higher requirement.	
39	IA renewal	The renewal requirements are unreasonable and retrograde. This is taking licenced engineers back to a calendar based renewal system that was despised by industry. Totally unacceptable			**Resolution** CASA has set 5 years as the duration of an IA and has reduced the number of activities required for renewal	

Key: Resolved | Future action | No action

CASR PART 43 Issues list						
This list of issues captured from consultation feedback						
Issue No	ISSUE TOPIC	*ISSUE SPECIFICS*	*REG/MOS REFERENCE*	*RESOLUTION OPTIONS*	*RESOLUTION DECISION*	*COMMENTS*
40		Part 43 should not be implemented How does CASA plan to compensate CAR 30 and part 145 organisations who currently maintain the category of airframes covered by Part 43 proposed regs			**No action** CASA does not support the premise that widespread harm will be done to COA holders and AMOs.	
41		Why is CASA not listening to their own people who are not supportive of these changes.			**Noted**	
42		The proposal for piston engine overhaul is a complete farce. CASA has taken leave of it's senses on this issue. You cannot seriously believe that uncontrolled licence holders will comply with current engine overhaul requirements. I am strongly opposed to this change. It will compromise safety and allow fringe dwellers to thrive in a largely unregulated environment of CASA's creation			**No action** CASA should not respond to unsupported assumptions	
43		the FAA has a clear policy that only the FAA, not manufacturers, can mandate maintenance requirements. This is appropriate - among other reasons, manufacturers arguably have a conflict of interest. When implementing these rules in Australia (at least for US manufactured aircraft), CASA must ensure it does not inadvertently make a manufacturer recommendation mandatory in the implementing rules, for example by reference to requiring compliance with manufacturer recommendations or data.			**In hand**	
44	IA recognition	A respondent said we should also recognise the PNG IA as it is also FAR based			**Resolution** CASA agrees and we have added the PNG IA to the MOS list of recognised qualifications	
	Recreational pilots	Not permitting recreational pilot licence holders to carry out pilot maintenance and perform independent inspections of flight control systems after maintenance does not make sense. They can do these things under Schedule 8 of CAR			**Resolution** CASA agrees and we have deleted all restrictions on pilot maintenance by recreational pilot licence holders	
	AMTC1	As the draft MOS is written, CASA must grant an AMTC1 to an applicant who complies with the 18 month experience requirements even if the applicant is known to be incompetent for the maintenance			**Resolution** CASA has added a provision that CASA may ask an applicant for an AMTC1 to provide evidence of competence to perform the maintenance to the required standard.	

Key: Resolved | Future action | No action

CASR PART 43 Issues list						
This list of issues captured from consultation feedback						
Issue No	**ISSUE TOPIC**	***ISSUE SPECIFICS***	***REG/MOS REFERENCE***	***RESOLUTION OPTIONS***	***RESOLUTION DECISION***	***COMMENTS***
45	AMTC	18 months experience is inadequate for returning an aircraft to service			**CASA disagrees** The AMTC1 provides for specialist maintenance, in most cases of aeronautical products. An AMTC1 does not permit the holder to approve return to service of an aircraft after scheduled inspections or maintenance that is not specified on the certificate	

Good morning all,

s 22 and I participated in a Part 43 workshop yesterday in Canberra. The workshop concentrated on issues/comments on the Part 43 proposal and discussion on areas that requires clarity. Before I lose you in the list of workshop discussion points, I would like to highlight two items.

- **Next Project contact** - Next planned communication is an update on proposed new GA maintenance regulations provided by the Part 43 Project on 02 Apr 19 at 1000 that will be held in our conference room (hopefully you have already received an outlook calendar invite).
- **Request for information** - Can I request that you review and provide me (so I can collate them and forward to the project) with any 42ZC(6) that is not within Pilot maintenance list contained within the *Policy Decision Summary* that I supplied via email last week.

As you can imagine there was extensive conversation and in some cases, we did get stuck in the detail. A number of points were raised during the workshop and the majority of the key points are provided below for your review:

- s 22 (only present for the workshop introduction) stated that:
  - He believes that the risk for the project is not the regulatory system, it is the Australian implementation of a safe system, and
  - Part 43 is in-line with the DAS focus on proportionate sector risk based regulatory requirements, this is why air transport out of scope.
- Maintenance organisation challenges are acknowledged – it should be noted that we need to focus on the overall benefit to industry.
- CAR 30 / Part 43 liability concern – Insurance will still be able to be gained by an organisation via their Australian Company Number, this has been verified / supported by the insurance industry. Cost example for less than $75K turn over equals a premium of approximately $1,088.
- Defects need to be informed to the registered operator and the operator needs to ensure that the aircraft is not flown before any "major" defects are rectified and the unserviceable aircraft/aircraft equipment is tagged as inoperative. (Part ~~91/137~~43 MOS ~~etc~~ will hold these requirements).
- Some FAR 91 maintenance requirements will be introduced into the CASR Part 43~~A Part 91~~ requirements (to ~~reduce~~ avoid making changes to Part 91).
- Current MR will be acceptable but not mandatory (see CAAP for detail/requirements).
- A paper has been put forward to s 22 to request what maintenance organisation are maintaining Charter only/Charter, aerial work and private/ aerial work and private only to inform the project.
- It is intended that Part 43 will be released with a large amount of guidance material. Regional based training sessions/workshops will be held for AWIs.
- A variation of the FARs - It is proposed that an IA can supervise an inspection. B2 will not be able to conduct an annual inspection.
- Apprenticeships will work the same manner, under the Part 147 but may conduct hands on within a Part 43 environment.
- It was discussed that a large number of CAR30 organisations are managing the operators airworthiness requirements for the registered operator – In transition it was suggested that training needs to educate not only maintainers and the operators on the Part 43 requirements.

- It was discussed that CAR30 organisations may wish to ascertain what their customer based will do prior to making concrete business regulatory decisions. As an example, a muster may reduce their charter aircraft to private/aerial work to allow Part 43 to apply (Operators will make decisions on their business model).
- Engine Overhaul – if not licenced need to have competently conducted one under supervision or have completed suitably training/experience. The following basic definitions was discussed as they will be incorporated into Part 43:
    - Overhaul – all components are within limits set by Manufactures (zero TSO, first/second life),
    - Rebuild is return to Production data, done by the Manufacture.
- Part 43 to a Part 135 aircraft (charter) transition requirements was raised as a concern. It will be most likely as difficult / similar to the transition of an aircraft from CAR30 to Part 42.
- Part 43 transition is most likely 2020. CAR 30 will remain until all regulatory transition is resolved, on completion the CARs will go.
- Form 337 – the proposal is that the Form 337 will not be required by Part 43. This is based on the fact that the FAA do not review the submitted forms due to manpower restraints and that all the Form 337 information should be duplicated in the aircraft maintenance records. The question was raised whether we need the form/information for surveillance however it was highlighted that the intent was that the running system oversight is most likely going to be limited. Discussion lead into that surveillance and engagement needs to be high during implementation. It was discussed that the removal of the form could have a cultural or process impact that we are not aware of, but this was considered low risk (especially from a process perspective as CASA would not have the manpower to review).
- FAA has not oversighted Part 43 in the last ten years (they have had the system implemented for an extensive amount of time)- oversight of Part 43 is within the RSSTT not the PART 43 STDS project.
- Post discussion initial IA will not be automatic authorisation, there will be an application and satisfaction of mandatory requirement (requirements still in development, a training course as part of another implementation roadshow is being considered).
- Initial IA will be managed by MPL and will not be placed on the licence, it was suggested that the re-issue could be conducted by RSS and be part of the surveillance information (much the same as the approach taken for delegate management) this is supported by the project team.
- The project team will investigate if IAs can be identified on the CASA website (EAP report displayed on website). This will assist operators to ensure that the IA authorisation is valid. Additionally, this will allow the operator a way to identify possible IAs in their area.
- There will be a need to shift the AWI mindset to shift from process/manuals to the product/aircraft airworthiness focus with the implementation of Part 43.
- Mandatory verse recommended maintenance – in Part 91 the only mandatory items are AWL and ADs. R22/R44 will require AWL (blade replacement etc) but may not be required to conduct a 2200 hourly inspection, inspection of appendix D.
- ICA can be used for the life of the aircraft from the original issued ICA release with the TC, no need to align with any amendments
- No welding approvals will be used within the Part 43, B1 can release (minor), B1 can do with approved data with an IA inspection (major repair), both conducted with acceptable standards. Same approach be use for NDT.
- No type rating under Part 43.

- Proposal will allow an airframe licence holder that has done basic to be able to be an IA (65.91 will most likely be the area of amendment). Therefore, the a B1 with an E3 exclusion with basic will be able to maintain with experience on task. This will not translate for an engine licence with airframe basics.
- Independent inspection of flight controls will be incorporated into the Part 43 system (based on the CAR system not the CASR system).
- 145 can carried out an annual inspection either with a LAME with an IA or a process that satisfies the IA requirements for authorisation for a LAME as an IA (will be on behalf on the
- 145). Consideration of Part 43 licence coverage expansion within the 145 IA mechanism requires additional clarification/determination by the Project (i.e. can a 145 LAME sign beyond their 'normal' 145 licence coverage akin to that of the individual Part 43 IA).
- AD/Prop 1, AD/Eng 4 and AD/Eng 5 will be removed. Piston will be on condition and Turbine will be on a schedule from the manufacture or a schedule approved by CASA (SOM).
- DAMP – No Micro-DAMP will be required but individuals can still be tested.
- Permissible Unserviceabilities (Defects) will be invoked through 21.007 when Part 43 is envoked.
- A pilot maintenance list will be retained in the Part 43 MOS.
- There is be no 42ZC(6), this will be now investigated for inclusion.
- Parachute turbine engines will be scheduled as per 'charter' requirements.
- No changes are being considered for Part 66, currency requirements must still be satisfied.

If you have any questions or want to highlight any issues, please do not hesitate to contact either s 22 or myself (or even directly to the project – primary s 22).

Regards

4 Overseas practice

Safety standards in Australian GA, while not comparable with airline safety standards, are comparable with GA safety standards in the USA, Europe and New Zealand.

It stands to reason that any regulatory reform should be focused on reducing regulatory burden to a level that is comparable to the USA and New Zealand.

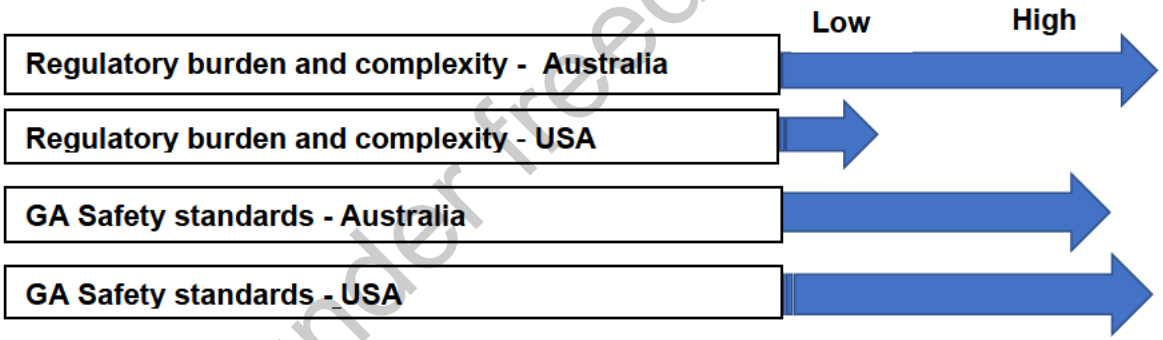
Extract from Australian Transport Safety Bureau (ATSB) report B2006/0002

Using North America and the United Kingdom to represent world's best practice and as a benchmark of aviation safety, the findings demonstrate that Australia has a good safety record and one that is similar to the safety records of the other countries examined.

In 2016, the fatal accident rate in the USA is estimated by the FAA to be 1.03 per 100,000 GA flight hours. The most recent figures available for Australia (ATSB 2013) indicated 1.3 fatal accidents per 100,000 GA flying hours.

Based on these figures, it is reasonable to assume that a relaxation of GA maintenance regulations will not necessarily lead to a reduction in GA safety.

Comparison: *GA safety standards vs regulatory complexity - Australia/USA*



With these statistics in mind, CASA could considerably reduce the weight of legislation affecting maintenance of GA aircraft without reducing safety levels. The key to this outcome would be to base any changes on a successful international model.

7

Proposal to develop a tailored set of maintenance regulations for general aviation

Overview

CASA is currently working to develop a new set of maintenance regulations tailored specifically for general aviation (GA), that will be based on the example of best practices in other leading aviation nations.

The new regulations seek to meet an overarching objective of streamlining maintenance requirements, minimising the level of regulatory burden and reducing costs while still maintaining the high aviation safety standards expected by all Australians.

How do we define general aviation?

General aviation covers all flying activity carried out by VH registered aircraft other than charter and air transport operations. This includes flying training, mustering, firefighting and emergency service operations, search and rescue, aerial surveying and photography, towing, and private flying.

Principles underpinning this work

Last year CASA established an **Aviation Safety Advisory Panel** *<https://www.casa.gov.au/rules-and-regulations/standard-page/aviation-safety-advisory-panel>* (ASAP) made up of industry representatives. In July, the ASAP endorsed the following key principles that will underpin the proposed changes:

- minimum regulatory compliance burden consistent with ensuring a level of safety appropriate for the general aviation and aerial work sectors
- any changes are intended to be cost neutral or provide savings for the general aviation and aerial work sectors wherever possible.
- a regulatory structure based to the maximum practical extent on an established and appropriate international standard
- compliance with the standards set by the International Civil Aviation Organization (ICAO) for general aviation:
    - Annex 6 Part II — International General Aviation — Aeroplanes
    - Annex 6 Part III, Section III — International General Aviation — Helicopters.

Benefits of basing the regulations on an existing model

Adopting a regulatory structure based on an established and appropriate international standard that is tried, tested and proven to be working effectively, is an efficient approach to delivering tangible improvements to Australia's GA community. For example, in the United States there have been general aviation maintenance regulations in place for over 50 years. Why re-invent the wheel?

Why we are consulting

We will be working with industry on the development of these new regulations. As a first step, we are inviting the general aviation community to tell us about the challenges currently faced and highlight opportunities.

We also want industry to consider the practices of four leading aviation nations and provide us with feedback that will be used to choose the best model on which to base our new maintenance regulations for general aviation.

We have shortlisted, the United States, New Zealand, Europe and Canada as leaders in general aviation maintenance and their approaches align with the key principles for this work. All four nations uphold a strong general aviation safety record with simple, less prescriptive regulations in place for general aviation maintenance.

What Happens Next

CASA anticipates the ASAP will establish a technical working group to help review industry input to this consultation and work with CASA to select and develop the most appropriate international model on which to base our proposed new maintenance regulations for general aviation. We aim to have the policy established by the end of this year.

At the end of the response period for public comment, we will review each comment and submission received. We will make all responses publicly available on the CASA Consultation Hub unless a respondent requests that their submission remain confidential. More information about how we consult is available on the **CASA website** *<https://www.casa.gov.au/rules-and-regulations/landing-page/consultation-process>* .

You can subscribe to our **consultation and rule making mailing list** *<https://mailinglist.casa.gov.au/?p=subscribe&id=3>* to be notified of future consultation or rule making.

Introduction

We would like your feedback regarding our proposal to develop a tailored set of maintenance regulations for general aviation.

We will ask you for:

- **personal information**, such as your name, any organisation you represent, and your email address
- **your consent** to publish your submission
- **any comments** you may want to provide

Our website contains more information on **making a submission and what we do with your feedback.** *<https://www.casa.gov.au/rules-and-regulations/landing-page/consultation-process>*

Personal information

First name?

(Required)

Last name?

(Required)

What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

Email (Required)

Do your views officially represent those of an organisation?

Please select only one item

◯ Yes ◯ No

If yes, please specify the name of the organisation.

Consent to publish your submission

In order to promote debate and transparency, CASA intends to publish all responses to this consultation. This may include both detailed responses/submissions in full and aggregated data drawn from the responses received.

Where you consent to publication, we will include:

- **your name**, if the submission is made by you as an individual or the name of the **organisation** on whose behalf the submission has been made
- **your responses and comments**.

We will not include any other personal or demographic information in a published response.

Do you give permission for your response to be published?

(Required)

Please select only one item

◯ Yes - I give permission for my response/submission to be published.

◯ No - I would like my response/submission to remain confidential but understand that de-identified aggregate data may be published.

◯ I am a CASA officer.

Issues and opportunities

To help us develop a set of maintenance regulations tailored to general aviation, please tell us about your current challenges and where you see opportunities by answering the questions below.

Further information: Summary of Australia's current approach in a range of areas

CASA's regulations for managing continuing airworthiness for general aviation are currently contained in ***Civil Aviation Regulations Parts 4, 4A, and 4B.***
<https://www.legislation.gov.au/Details/F2017C00094/Html/Volume_1#_Toc473722660>

Below is a summary of how Australia currently approaches aircraft maintenance in some key areas.

Responsibility for airworthiness

Currently in Australia, the maintenance organisations are responsible for ensuring the airworthiness of an aircraft and that all required maintenance has been completed before issuing a maintenance release, and the issuance of a maintenance release is an implication that the aircraft will remain airworthy until the next periodic inspection. International standards specify that the aircraft owner or operator is responsible for maintaining the airworthiness of an aircraft and a maintainer is only required to certify that the work he or she has carried out is serviceable.

Maintenance organisations requirements

The CAR 30 Certificate of Approval sets out the requirements for maintenance organisations that typically maintain GA aircraft. Entry control and ongoing surveillance audits are currently 'one size fits all' and we see there could be opportunities to make improvements.

Independent licensed aircraft maintenance engineer (LAME) privileges

Currently in Australia, there are provisions for independent LAMEs (i.e. LAMEs who do not work on behalf of a maintenance organisation) to certify minor maintenance that they have conducted. Schedule 7 sets out the things an independent LAME cannot do. One opportunity might be to increase privileges so that an independent LAME can use the full scope of their licence privileges outside of the approved maintenance organisation.

Generic inspection schedule

The generic maintenance schedule can be understood as the minimum inspection tasks to be covered for each annual/100 hourly inspection. CASA's **Schedule 5**
<https://www.legislation.gov.au/Details/F2017C00094/Html/Volume_4#_Toc473728061> sets out the minimum standard list of inspection tasks.

Maintenance certifications

CASA has unique and prescriptive rules for certifying maintenance. These rules are contained in **CAR (1988) 42ZE and Schedule 6**
<https://www.legislation.gov.au/Details/F2017C00094/Html/Volume_1#_Toc473722725> . With this review, we think there's an opportunity to consider simplifying these requirements.

Maintenance release

The CASA maintenance release is a multi-purpose document that includes flight-tech log and defect recording/certification. In other countries the MR means a plain and simple Release to Service entered in the logbook.

Airworthiness review requirements (currently not required in Australia for GA)

Australia currently doesn't have this requirement for GA. In New Zealand and Europe it is seen as a way of managing airworthiness assurance by reviewing the logbooks, certifications, major work and a physical survey of the aircraft generally in last 1-2 years.

Inspection authorisation requirements (currently not required in Australia)

In America and New Zealand, the Inspection Authorisation (IA) is an additional approval given to a licensed mechanic to ensure airworthiness compliance after major repairs/ alterations and to carry out annual inspections.

Pilot maintenance privileges

We currently allow some level of pilot authorised maintenance in GA as per **Schedule 8** *<https://www.legislation.gov.au/Details/F2017C00094/Html/Volume_4#_Toc473728100>* .

Maintenance records

The current approach for maintenance records is prescriptive. For example, organisations are encouraged to use a **logbook system developed by CASA** *<https://www.casa.gov.au/manuals-and-forms/standard-page/order-printed-maintenance-forms>* (available for purchase) or obtain approval to use an alternative. We think there is an opportunity to simplify record keeping requirements.

Modifications and repairs

Currently, modifications and repairs to aircraft are approved by an authorised person and the LAME does the release to service. **See CAR 42U for more information.** *<https://www.legislation.gov.au/Details/F2017C00094/Html/Volume_1#_Toc473722712>*

Other countries have found ways to simplify the approval process for modifications and repairs to non-complex aircraft, thereby reducing compliance burden.

1. In regard to general aviation, have you experienced issues and/or challenges in any of the following areas? (Select all that apply).

Please select all that apply

- [ ] Maintenance organisation requirements
- [ ] Independent licensed aircraft maintenance engineer (LAME) privileges
- [ ] Generic inspection schedule
- [ ] Maintenance certifications
- [ ] Maintenance release
- [ ] Pilot maintenance
- [ ] Maintenance records and logbook requirements
- [ ] Modifications and repairs
- [ ] Other

(please specify)

2. What kind of issues and/or challenges are you currently experiencing in regard to general aviation, and how have they impacted you?

Comments

3. Can you think of any opportunities that would improve our regulatory system for general aviation maintenance? For example, ways to reduce costs and red tape while maintaining a high safety standard. Please provide detail.

Comments

Benefits and limitations of international models

One of the principles underpinning this proposal is to develop a regulatory structure based to the maximum practical extent on an established and appropriate international standard.

We have shortlisted, the United States, New Zealand, Europe and Canada as leaders in general aviation maintenance and their approaches align with the key principles for this work.

Please consider the practices of these four leading aviation nations and provide us with feedback that will be used to choose the best model on which to base our new maintenance regulations for general aviation.

1. United States – FAA

Summary of America's approach to general aviation maintenance

The United States of America has a strong history of safely managing its general aviation fleet. They have had general aviation maintenance regulations in place for over 50 years.

Many Australian aircraft have been manufactured, certified and often previously operated in America.

In America, the regulations for maintaining general aviation aircraft are in two places:

- **Part 43 – Maintenance, preventative maintenance, rebuilding, and alteration** *<https://www.ecfr.gov/cgi-bin/text-idx?SID=7225a47d36c9bdbf898f26a57a96ad56&mc=true&node=pt14.1.43&rgn=div5>* defines basic maintenance requirements, record keeping, and release to service requirements
- **Part 91 – General operating and flight rules** *<https://www.ecfr.gov/cgi-bin/text-idx?SID=7225a47d36c9bdbf898f26a57a96ad56&mc=true&node=pt14.2.91&rgn=div5>* covers all the rules for adequately managing continuing airworthiness of general aviation aircraft and specifies that the owner or operator of an aircraft is responsible for maintaining the aircraft in an airworthy. condition

Within these regulations, key features tailored to GA include:

- No requirement for a maintenance organisation approval to carry out maintenance for aircraft other than those in air transport (Part 121).
- Maintenance is carried out by certificated airplane and powerplant mechanics whose certificates cover the work.
- Independent mechanic privileges are restricted to aircraft under 5700kg MTOW and do not include the permission to carry out an annual inspection (unless the mechanic holds an inspection authorisation).
- A mechanic must also hold an inspection authorisation to be able to authorise release to service of an aircraft after an annual inspection or a major modification or repair.
- Generic Maintenance schedule (**Appendix D of FAR 43** *<https://www.ecfr.gov/cgi-bin/text-idx?SID=7225a47d36c9bdbf898f26a57a96ad56&mc=true&node=pt14.1.43&rgn=div5#ap14.1.43_117.d>*) is like **CASA's Schedule 5** *<https://www.legislation.gov.au/Details/F2017C00094/Html/Volume_4#_Toc473728061>* , but less detailed.
- A release to service is made in the aircraft log book: a one-line statement with details of the person authorising the release to service, the person's signature and the date.
- Pilot maintenance:
  - A Part 61 certificated pilot may perform preventive maintenance on aircraft not engaged in air transport (Part 121 and Part 135), or international operations (Part 129).
  - Preventive maintenance is like **CASA's Schedule 8.** *<https://www.legislation.gov.au/Details/F2017C00094/Html/Volume_4#_Toc473728100>*
  - Training not prescribed for pilot maintenance of GA aircraft.

Although written with some complexity including some terminology and definitions not generally used in Australia, the American rules are clear and logical with minimum burden to the GA industry.

Based on the summary above about how they approach general aviation maintenance in the United States:

a) What would you see as the main benefits in adopting the United States' model for regulating general aviation maintenance? Please detail.

b) What could be some potential limitations if Australia adopted the United States' model for regulating general aviation maintenance? Please detail.

2. New Zealand – CAA

Summary of New Zealand's approach to general aviation maintenance

New Zealand introduced general aviation maintenance regulations over 13 years ago with the aim to clarify, simplify and reduce burden on the GA community.

Their model is very similar to the American system whereby all the rules for maintaining general aviation aircraft are in two places:

- **Part 43 - General maintenance rules** *<https://www.caa.govt.nz/rules/part-043-brief/>* establishes the minimum standard for all aircraft to ensure the continued validity of an Airworthiness Certificate and a high level of safety. It spells out details for inspections to be completed (in accordance with Part 91).
- **Part 91 - General operating and flight rules** *<https://www.caa.govt.nz/rules/part-091-brief/>* cover all the rules for adequately managing continuing airworthiness of general aviation aircraft.

Within the New Zealand regulations, key features tailored to GA include:

- Maintenance organisation approval only required for aircraft engaged in commercial operations under AOC approvals; aircraft of 5700kg MTOW or higher; aircraft with 10 or more passenger seats; and aircraft used for adventure operations.
- A LAME may perform all maintenance of non-commercial aircraft and must hold an Inspection Authorisation to release an aircraft to service after an annual inspection, major modification or major repair.
- A release to service is made in the aircraft log book: a one-line statement with details of the person authorising the release to service, the person's signature and the date.
- Pilots can perform some maintenance on small GA aircraft for simple tasks and must be trained by a LAME and authorised by the operator.

Based on the summary above about how they approach general aviation maintenance in New Zealand:

a) What would you see as the main benefits in adopting the New Zealand model for regulating general aviation maintenance? Please detail.

b) What could be some potential limitations if Australia adopted the New Zealand model for regulating general aviation maintenance? Please detail.

3. Europe

Summary of Europe's approach to general aviation maintenance

In Europe, the European Aviation Safety Agency (EASA) launched a **GA roadmap** *<https://www.easa.europa.eu/easa-and-you/general-aviation/general-aviation-road-map>* five years ago. It sets out a plan for achieving lighter, simpler and better regulation for general aviation, including GA aircraft maintenance. The principles underpinning the GA roadmap are:

- one size does not fit all
- use rules when it is the only or the best way to reach the safety objectives
- adopt a risk-based approach
- protect 'what shows to work well' unless there are demonstrable and statistically significant safety reasons against doing so
- apply EU smart regulation principles
- make the best use of available resources and expertise.

In Europe, maintenance regulations are contained in Part-M.

As part of implementing the GA roadmap, EASA is currently introducing a light set of maintenance regulations tailored for general aviation (Part-ML). The requirements of the regulations would be in proportion to the lower complexity and risks of the lighter end of the general aviation community. They will also be clear and simple to facilitate implementation.

Part-ML proposes alleviations for aircraft maintenance programmes, airworthiness reviews and deferment of defects. It would apply to the following aircraft when unless they are listed in the air operator certificate (AOC) of an air carrier or classified as complex motor-powered aircraft:

- aeroplanes of 2730 kg maximum take-off mass (MTOM) or less;
- rotorcraft of 1200 kg MTOM or less, certified for a maximum of up to 4 occupants; and
- other light aircraft.

See EASA publications *<https://www.easa.europa.eu/document-library/general-publications?publication_type%5B%5D=148>* including the 'GA Roadmap progress report' for more information.

Based on the summary above about how they approach general aviation maintenance in Europe:

a) What would you see as the main benefits in adopting the European model for regulating general aviation maintenance? Please detail.

b) What could be some potential limitations if Australia adopted the European model for regulating general aviation maintenance? Please detail.

4. Canada

Summary of Canada's approach to general aviation maintenance

In Canada, continuing airworthiness for general aviation is managed by a mixture of regulations and standards under a common heading as follows:

CAR Part V – Airworthiness *<http://www.tc.gc.ca/eng/acts-regulations/regulations-sor96-433.htm#v>*

- **501 - Annual Airworthiness Information Report** *<http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part5-standards-standard501-1952.htm>*
- **537 - Appliances and Parts** *<http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part5-standards-537-menu-3244.htm>*
- **551 - Aircraft Equipment and Installation** *<http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part5-standards-chapter551-258.htm>*
- **563 - Distribution of Aeronautical Products** *<http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part5-standards-chapter563-1950.htm>*
- **571 – Maintenance** *<http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part5-standards-standard571-1971.htm>* – including Appendix's A thru M (Subpart 71)
- **573 - Approved Maintenance Organizations** *<http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part5-standards-standard573-1972.htm>* (Subpart 73)

Within the Canadian regulations, key features tailored to GA include:

- A LAME may perform all maintenance of non-commercial aircraft.
- A release to service is a simple statement accompanied by the details of the person releasing the aircraft, their signature and the date.
- No airworthiness review is required but an Annual Report is required to be sent into Transport Canada.
- Elementary maintenance tasks do not require a LAME release to service.

Based on the summary above about how they approach general aviation maintenance in Canada:

a) What would you see as the main benefits in adopting the Canadian model for regulating general aviation maintenance? Please detail.

b) What could be some potential limitations if Australia adopted the Canadian model for regulating general aviation maintenance? Please detail.

International regulations

Have you worked in general aviation maintenance under the rules of any of the international models mentioned in this consultation (i.e. United States, New Zealand, Europe or Canada)?

(Required)

Please select only one item

◯ Yes ◯ No

Experience with international regulations

1. You have identified as having experience working under the general aviation maintenance rules of one or more of the international models mentioned in this consultation. Please select from the list below, those regulations to which your experience applies.

Please select all that apply

☐ Europe ☐ Canada ☐ United States ☐ New Zealand

2. What kind of role did/do you have? (You may select more than one role if applicable)

Please select all that apply

- [ ] Aerial work
- [ ] Private flying
- [ ] Business aviation
- [ ] Sport aviation (including self-administered organisations)
- [ ] Flight training (including recreational, private and commercial pilot training organisations, and multi-crew training organisations)
- [ ] Recreational pilot/private pilot
- [ ] Maintenance authority
- [ ] Aircraft design/engineering/building
- [ ] Maintenance organisation
- [ ] Maintenance training organisation
- [ ] Licensed aircraft maintenance engineer
- [ ] Aircraft maintenance engineer
- [ ] Consultant & other professional services
- [ ] Chief engineer
- [ ] Government organisation
- [ ] Safety manager
- [ ] CASA officer
- [ ] Other (Specify)

Other

3. Based on your experience working with international regulations, what do you consider to be the benefits of the maintenance regulations for general aviation in that country? Please detail.

Comments

4. Based on your working experience in international regulations, what do you consider to be the limitations of the maintenance regulations for general aviation in that country? Please detail.

Comments

Final Comments

Do you have any further comments or feedback?

Comments

Final question to assist analysis

In order for us to summarise the responses of different stakeholder groups, we have a final question.

Which of the following best describes your current primary role in the aviation sector? (please select one)

(Required)

Please select only one item

- ◯ Aerial work
- ◯ Private flying
- ◯ Business aviation
- ◯ Sport aviation (including self-administered organisations)
- ◯ Flight training (including recreational, private and commercial pilot training organisations, and multi-crew training organisations)
- ◯ Recreational pilot/private pilot
- ◯ Maintenance authority
- ◯ Aircraft design/engineering/building
- ◯ Maintenance organisation
- ◯ Maintenance training organisation
- ◯ Licensed aircraft maintenance engineer
- ◯ Aircraft maintenance engineer
- ◯ Consultant & other professional services
- ◯ Chief engineer
- ◯ Government organisation
- ◯ Safety manager
- ◯ CASA officer
- ◯ Other (Specify)

Other