



GA/AWK CONTINUING AIRWORTHINESS AND MAINTENANCE REGULATIONS PROJECT
ASAP TECHNICAL WORKING GROUP
TASKING INSTRUCTIONS AND **THIRD TWG MEETING REPORT**

The Part 43 Technical Working Group (TWG) is established and operates in accordance with the Terms of Reference of the Aviation Safety Advisory Panel (ASAP) dated September 2017 (or as amended).

PURPOSE

The role of the TWG will be to provide relevant technical expertise and industry sector insight for the development of legislation in accordance with the agreed policy principles.

The TWG will:

- 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 policies, regulations, advisory materials and transition strategies
- Provide endorsement and or conditional endorsement of policies, regulations, advisory materials and transition strategies for consideration by the ASAP and CASA.

KEY PRINCIPLES

The following principles for the reform are:

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

** ICAO recognises AWK as a distinct aspect of civil aviation but has not prescribed AWK standards since ICAO separated AWK from GA in 1990.*

SPECIFIC OBJECTIVES

The project has three key components:

1. **Regulation model.** Review ICAO standards and international legislation with a view to adopting the model that most closely meets the key principles for the reform.
2. **Legislation.** Review the existing Australian legislation against the selected international legislation and determine:
 - a. Any differences from the selected international legislation that are essential to address unique Australian conditions.
 - b. Transitional strategies to minimise the disruption to current industry.
3. **Detailed policy development.** Prepare a comprehensive document setting out the detailed policy settings required for provision of drafting instructions

Timelines for specific outputs are:

- Project launch and initial submissions: August 2018
- **TWG meeting: September 2018**
- Public consultation on detailed policy: prior to end of 2018

- Policy finalisation: End 2018/early 2019
- Legislation drafting: Q2 2019
- **TWG meeting (if necessary): mid-2019**
- Public consultation of legislation and guidance material: mid-2019
- Regulatory package to Department: Q4-2019

REPORTING ARRANGEMENTS

The TWG will provide a status report to the regular meetings of the ASAP on progress.

Recommendations and reports of the working group will be provided to the Chair of the ASAP, through the secretariat.

ROLES AND RESPONSIBILITIES

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

CONSENSUS

A key aim of the TWG is that a consensus be reached, wherever possible, in the finalisation and preparation of advice for the Aviation Safety Advisory Panel and CASA.

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

MEMBERSHIP

Jeff Boyd	Mike Higgins	Peter Pring-Shambler
Warren Bossie	David Boundy	Leslie McChesney
Perry McNeil*	Eric Benton**	Charles Thompson**

*Attended remotely for part of the TWG meeting and was not present to write the report.

** Unable to attend the TWG meeting

The TWG CASA Lead, Mick English was supported by Carl Madsen and Ben Challender.

The ASAP Secretariat was represented by Matthew Bouttell.

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 quorum of seven, agreed with the outcomes captured in this report in accordance with the ASAP terms of reference. All feedback was captured by the ASAP Secretariat.

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

SUMMARY OF OUTCOMES – TWG Meeting, Canberra – 19 – 20 August 2019

Post the second TWG meeting that took place via telecon on 11 March 2019, the TWG 'generally supported' Part 43 however members also sought further information regarding the New Zealand Part 43 'to ensure the correct policy is adopted in Australia.'

Prior to the 20 June 2019 ASAP meeting, CASA provided specific details of New Zealand's Part 43 to the TWG members with subsequent feedback provided to the ASAP Secretariat via email. This feedback was provided to the ASAP and discussed at the above-mentioned meeting. The outcome of these discussions was that the ASAP sought the Part 43 TWG to reconvene in order to obtain the TWGs final advice and recommendations to ASAP.

By reviewing CASA's proposed policy, this third meeting of the TWG is to provide feedback and advice to the ASAP to enable the development of advice to CASA's Director of Aviation Safety on the Part 43 policy.

A. Have the concerns raised by TWG members in previous TWG meetings and in post-meeting (out of session) discussions been satisfactorily addressed?

CONSENSUS / GENERAL CONSENSUS / DISSENT

Comments:

For the categories of aircraft within the scope of CASR Part 43, the TWG is in consensus that the previously raised concerns have been satisfactorily addressed.

It was noted that whilst out of scope for this TWG, the members continue to seek clarity on the maintenance requirements for aircraft engaged in charter operations. It was however noted that in the days immediately following this meeting the Charter Maintenance TWG will meet and three of the Part 43 TWG members are members.

Specific comments raised by the TWG include:

- Minor modifications to the Policy Decision Summary (PDS):
 - Clarifying the past experience requirements within the Executive Summary (or similar) of the PDS
 - Removal of the need to inform the CASA Flight Standards office regarding the discontinuing of progressive inspections
- Clear guidance will be required around the transitioning of aircraft maintained under Part 43 to other categories, e.g., to Air Transport

The TWG suggested that CASA should manage the expectations of industry with regards to the perception of 'guaranteed cost reduction' with the introduction of Part 43. This will be a key communications challenge for CASA.

B. Does the TWG recommend that the ASAP endorse the proposed policy on CASR Part 43?

* Based on the information provided and discussions held at the TWG meeting on 19-20 August 2019

SUPPORTED / UNSUPPORTED

CONSENSUS / **GENERAL CONSENSUS** / DISSENT

Comments

The TWG are in general consensus that the ASAP can endorse the proposed policy on CASR Part 43, provided that the feedback and concerns raised by the TWG are resolved and incorporated into the Policy Decision Summary (PDS).

CASA Lead Summary

Ben Challenger

Comment:

Meeting was very constructive with a number of good points that we have clarified and incorporated where required.

The fact that the Charter Maintenance project has now commenced, with the TWG meeting in the days subsequent to this TWG meeting, will provide further certainty to CASA and industry.

We acknowledge the need to be clear in our communication with industry to educate and inform.

APPENDIX

1. Extract from ASAP Terms of Reference
2. Part 43 TWG Agenda – 19-20 August 2019
3. FARs-Part 43 Variations Summary (pre-reading)
4. Part 43 TWG issues list

(extract) From ASAP and TWG Terms of Reference regarding Consensus

- 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 re-consider 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.

ASAP Technical Working Group
CASR Part 43 – General Aviation Maintenance Regulations
19-20 August 2019

Stromlo Room, Abode Hotel
10 Bowes St, PHILLIP ACT 2606

A G E N D A

Day One – Monday, 19 August 2019

Time	Topic	Presenter/s
9.30am – 10.00am	TWG members arrive at Abode Hotel	TWG members
10.00am – 10.15am	START - Welcome, introductions, housekeeping	ASAP Secretariat
10.15am – 11.00am	Review: <ul style="list-style-type: none"> • Previous TWG report to ASAP • ASAP meeting discussion and outcome • TWG Tasking Instructions and draft report template 	ASAP Secretariat
11.00am – 11.20am	Morning Tea	
11.20am – 11.50am	Part 43 Policy development overview	CASA
11.50am – 12.00pm	Part 43 Policy overview: <ul style="list-style-type: none"> • Part 43 PDS SS05/01 • FARs – Part 43 variations • Part 43 TWG Issues list 	CASA
1.00pm – 1.45pm	Lunch Break	
1.45pm – 3.30pm	Part 43 Policy discussion	TWG
3.30pm – 3.45pm	Afternoon Tea	
3.45pm – 4.45pm	Part 43 Policy discussion	TWG
4.45pm – 5.00pm	Wrap up of Day One <ul style="list-style-type: none"> • Summary of discussed and recorded issues 	ASAP Secretariat

Day Two – Tuesday, 20 August 2019

Time	Topic	Presenter/s
8.30am – 09.00am	Arrive coffee and ready for an 8:30am start	ALL
9.00am – 9.15am	Review of Day 1	ALL
9.15am – 10.30am	Part 43 Policy discussion	TWG
10.30am – 10.50am	Morning Tea	
10.50am – 12.30pm	Part 43 Policy discussion	TWG
12.30pm – 1.15pm	Lunch Break	
1.15pm – 2.30pm	TWG Report writing	ASAP Secretariat / TWG
2.30pm – 2.50pm	Afternoon Tea	
2.50pm – 4.00pm	Wrap up of Day Two including discussion on outstanding issues	All

CASR Part 43 project- summary of variations from FARs

Background

Public consultation has showed a strong preference for a ruleset based on the US-FARs with minimal changes. This preference was supported by the ASAP TWG and CASA gave an undertaking to incorporate the adopted FAR regulations into the *Civil Aviation Safety Regulations 1998* (CASR) with as little amendment as possible.

CASA foreshadowed that some changes would be unavoidable and changes would only be made:

- where words, titles, phrases or legal terminology are incompatible with Australian legal terms
- to clarify or remove ambiguity
- to incorporate any differences to the proposed policy outcomes that have been consulted with the GA sector.

The following table lists the key variations, that have been made in keeping with this commitment. Some changes were made to preserve existing legislative provisions that were either requested by industry, or considered necessary to maintain some existing safety provisions.

Topic	Changes	Reasons
FAA Form 337	Reporting of certain modifications and repairs to CASA via the Form 337 will not be required. Reference to the use of forms has been deleted from 43.9(d), but the other requirements remain unchanged. Appendix B of Part 43, which sets out the Form 337 reporting requirements, has been deleted.	Reporting certain modifications and repairs to CASA via the Form 337 has had some support from some stakeholders; however, its adoption would impose an obligation on maintainers to, in effect, create a duplication of records for one subset of modifications and repairs with the sole purpose of sending the information to CASA. It is the registered operator's responsibility to keep aircraft maintenance records, not CASA's. In the absence of a clear and demonstrable safety benefit to industry, and in accordance with government red tape reduction policy, CASA does not propose to adopt the FAA Form 337 policy for Part 43.
LAME privileges	Replaced A&P with B1 & B2 licence structure and allocated some privileges between the 2 categories.	CASR Part 66 will remain the Australian aircraft maintenance engineer licensing system. The FAA has a different aircraft maintenance engineer licensing system. Some changes are therefore necessary to amalgamate FAR Part 43 with CASR Part 66. The CASR Part 66 PIR has identified that more proportionate licensing arrangements for small, simple aircraft need to be introduced, but the PIR is currently working on other essential issues around Part 66 training that need to be done before looking in detail at issues like potential new categories of licences or earlier licensing outcomes for the private and aerial work sectors. CASR Part 43 will introduce more proportionate maintenance certification standards for the private and aerial work sectors using the existing Part 66 licensing system. In all cases maintenance certification privileges will remain competency based. CASA has introduced a provision at new section 65.82 for B2 LAMEs to certify for avionics maintenance. 65.81 has been modified to provide for expansion of scope of B1 privileges using more proportionate and flexible competency based assessments.
Inspection Authorisations	(1) Remove common date for expiry of all IAs	A common industry-wide renewal date is considered to be inefficient and the resulting congestion at renewal time could lead to lengthy delays with associated disruptions to maintenance certifications. Additionally, a single expiry date for all IAs as used in the US would impose abbreviated duration of authorisation for the majority of initial IA holders.

Topic	Changes	Reasons
	(2) Introduce a limited (Avionics) authorisation for B2 LAMEs.	The introduction of a limited IA for B2 LAMEs is better suited to the Part 66 licensing structure and provides for allocation of complex avionics maintenance tasks to the most appropriately qualified LAMEs. This provision is also under consideration by the NZ CAA.
Repairman	“Repairman” replaced by “Aviation Maintenance Technician” (AMT)	CASA has modified FAR sections 65.101, 65.104 and 65.107 in order to comply with Australian legislative drafting standards which require use of gender-neutral language. The FAR policy effects are largely unaltered.
Operation after maintenance etc.	Inserted requirement for independent inspection of flight controls after maintenance.	Industry submissions strongly supported retention of an independent inspection modelled on the provisions of CAR 42G. CASA agrees that this desirable safety enhancement should be retained and we have included appropriate provisions in 91.407 and 43.13.
Inspections	The following changes have been made to 91.409 in response to industry submissions received during public consultation and input from the Technical Working Group.	
	(1) Inserted requirements relating to scheduled maintenance and engine overhauls for transport category aircraft. For transport category aircraft, scheduled inspections, scheduled maintenance and engine overhauls will be required to be carried out under the control of an AMO.	Some stakeholders expressed concern about independent LAMEs maintaining complex turbine powered aircraft and overhauling piston engines for large or complex aircraft. This change provides industry with legislative certainty by legislating the effective safety standards that would be imposed under Part 43.13 performance rules in response to industry and TWG submissions.
	(2) Incorporated CASA progressive inspection schedule as set out in paragraph 2.5 of Schedule 5 of CAR.	Schedule 5 provisions for staged inspections are less complex than FAR requirements and this provision will provide continuity for ROs who are already using the Schedule 5 staged inspection program.
	(3) FAR inspection planning tolerances expanded and CASA has removed the requirement that planning time may only be used to fly to a place for maintenance.	This variation will maintain current flexibility in maintenance planning and is considered to be appropriate to the GA/AWK sector. CASA has provided for inspection planning tolerances of up to 10 hours for a 100-hour inspection or 10 days for an annual inspection (based on existing CAO 100.5 provisions).
	(4) All turbine engines to be inspected in accordance with a manufacturers recommended progressive inspection or an annual checklist that is provided by the manufacturer.	This requirement addresses a known deficiency in FARs. The FAA is proposing to introduce similar words in a guideline. The variation will retain current Australian standards for turbine engines. A supporting entry has also been made in Appendix D.
	(5) Engine inspection requirements for Parachute training aircraft and aircraft engaged in tandem parachute operations	Required to preserve necessary existing parachuting sector safety standards for engine inspections (current requirements are in CAO 100.5).
Altimeter system, altitude reporting equipment and ATC transponder tests and inspections	Testing may be performed by B1 or B2 LAME if they have the appropriate equipment and are trained/competent to perform the tests.	This provision is considered desirable to provide greater access to services, particularly in remote areas. Altimeter and altitude reporting competency is underpinned by licence training module theory and local training on test equipment. ATC transponder testing is considered a “simple test” based on proportionate application of existing regulations to private and aerial work aircraft. This is for testing only – rectification requires B2. CASA regards the operation of modern testing equipment to be within the capabilities of any LAME who is trained in the use of the equipment. 91.411 and 91.413 have been reworded accordingly.

Topic	Changes	Reasons
Maintenance records	Introduced requirement for RO to update flight manual if a modification alters operational or maintenance requirements	This insertion is required to clarify RO responsibility. An accurate up to date flight manual is essential to safety of flight and a clear statement of the ROs responsibility has been added to 91.417.
Major Alterations, Major Repairs, and Preventive Maintenance	In response to industry submissions, the following changes were made to Appendix A of Part 43 (subpart C in the PDS)	
	(1) Added sections specifying major avionics repairs and alterations.	Required to enable limited B2 (Avionics) IA.
	(2) Added expanded list of pilot maintenance tasks	Expanded to incorporate existing Schedule 8 provisions and to regularise tasks that are routinely approved by CASA under CAR 42ZC(6). As the provisions are already in existence under CAR, their continuation would not have any adverse safety effects.
(3) Major modifications and repairs for transport category aircraft may only be carried out by an AMO.	This change provides industry with legislative certainty by legislating the effective safety standards that would be imposed under Part 43 performance rules in response to industry and TWG submissions.	
Defect reporting	Introduced a requirement to report major defects	FAR Part 43 does not require major defect reporting – the requirement resides in the relevant FAR operational regulations. Major defect reporting is a key safety feature that will be included generally in CASR Part 43.

CASR PART 43 TWG Issues list						
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?		<ul style="list-style-type: none"> • Adopt FAR competency based policy • Do not harmonise and maintain current restrictions. 	Harmonise with FARs, using CASR Part 66 licence. The core policy is that every certification privilege is under-pinned by proportionate application of Part 66 policies around theory and practical training and simple tests.	Compliance and privilege charts will be published
2	Engine overhaul outside of CASA AMO (145/CAR30)	Showing/maintaining competency for performing engine overhaul for B1 LAMEs working independently of CASA AMO		<ul style="list-style-type: none"> • Adopt FAR policy with performance rules • Do not harmonise and maintain current AMO restrictions. 	Harmonise with FARs, with minor variation. Engine overhaul outside of AMO is considered appropriate and acceptable for the private and aerial work sectors with the following exceptions: <ul style="list-style-type: none"> • turbine engines • engines for transport category aircraft. 	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)		<ul style="list-style-type: none"> • Adopt FAR policy with performance rules • Do not harmonise and maintain current AMO restrictions. 	Harmonise with FARs. Policy is appropriate for GA sectors. Independent maintainers are not permitted to issue Form 1 for release to service of components. AMT certificate will be available for individuals who did overhauls in CAR 30	
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)		<ul style="list-style-type: none"> • Improve communications on Part 43 requirements - most maintenance will not require an AMO • Improve scalability Part 145 • Improve knowledge of Part 145 transition. • Better transition options and timeframes. • Second (third?) kind of maintenance organisation 	Improve communications on Part 43 requirements - most maintenance will not require an AMO The Part 145 reform project and education on minimal requirements and simplified entry control to be AMO is needed.	
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.	FAR 43, Appendix D/ FAR 91	<ul style="list-style-type: none"> • Adopt FAR requirements • Introduce additional unique Australian requirements • Improve information on requirements 	The FAR Part 43, Appendix D checklist remains the minimum standard and is appropriate for small aircraft inspections. The checklist ensures that the aircraft continues to comply with its type certification – improving information on that underpinning requirement will ensure intended level of safety is achieved.	
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	<ul style="list-style-type: none"> • Ensure requirements are included in CASR 	The relevant Parts of FAR 91 have been included into CASR Part 43 project	
7	Too many variations from the FARs	There is a concern that CASR Part 43 policies are introducing too many variations from the US-FARs			It has always been understood that some variation will be necessary to amalgamate the US-FARs with the Australian regulatory framework. Variations have been minimised. A list of variations with explanations has been developed.	
8	NDT, Welding, MITCOM and Specialist maintenance - Outside of CASA AMO how are these	People are concerned about the appropriate checks & balances for the independent LAME certifying return to service for these multi-facetted things		<ul style="list-style-type: none"> • The AMT certificate will permit on-going maintenance by qualified 	Ensure effective communication of responsibilities of owner/RO and person certifying the maintenance.	Education and information is to be published for these topics

CASR PART 43 TWG Issues list						
Issue No	ISSUE TOPIC	ISSUE SPECIFICS	REG/MOS REFERENCE	RESOLUTION OPTIONS	RESOLUTION DECISION	COMMENTS
	maintenance activities managed, performed, certified /RTS?			individuals other than LAMEs. <ul style="list-style-type: none"> Improve information on CASR Part 43 responsibilities 	The LAME provides the certification for RTS when he/she is satisfied that the specialist work performed is carried out by a competent person. The specialist is required to show training to an appropriate standard for the task being performed but not necessarily hold a CASA authorisation	
9	Over-sight and visibility of Maintenance performed under Part 43	Concerns about unregulated “gum tree” maintenance.		<ul style="list-style-type: none"> Effective information of Part 43 responsibilities. Effective CASA ongoing sector oversight plan 	Effective information to CASA and industry. CASA to develop and implement effective oversight plan that will be proportionate and relevant for the sector in Australia	
10	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 issues.		<ul style="list-style-type: none"> Require Form 337 reporting Ensure information is recorded in aircraft records 	Form 337 reporting to CASA not required. The form may be used as an option. CASA under Part 21 already have the 21.M process and system for the approval of data. What’s needed is greater freedom to use acceptable data where the IA has determined it to be appropriate. The 337 form is not needed in our CASA airworthiness system	
11	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	IA system is essential for the FAR Part 43 inspection based system	The IA system is essential to ensure the competency of the IAs in the Part 43 inspection system. Information and training package and syllabus needs to be set for Australian Part 66 LAMEs to be granted an IA. IA performance standards to be met by AMO, CASA IA would be an AMC.	An AMO is not required to use an IA. The AMO will perform inspections in accordance with its approved procedures.
12	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.			The policy of who is responsible hasn’t changed from the CAR. Implementation of Part 43 is a good opportunity to improve RO knowledge generally.	Information sheets and education seminars will be used
13	Current CAR 30 holder businesses being “disadvantaged” by new competition	Many are concerned about fairness (re. past AMO costs), competition and a level playing field			Improve education for current businesses on Part 43 benefits. The individuals within current CAR 30 approved facilities are the ones that feel the most threatened by Part 43, but actually have the most to gain in terms of flexibility and opportunities.	
14	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 ...”			Individual’s liability insurance is largely considered an issue to be sorted out by market forces and industry. Insurance currently exists here and internationally (USA, NZ). CASA to provide more information on the subject to all affected parties.	
15	Aircraft that move between GA/AWK and Air Transport operations	Will the Part 43 certifications be considered acceptable to the operator/Part 145?			It is the RO’s responsibility to ensure compliance with relevant rules. An airworthiness review is the pathway for all aircraft into Part 42. This is	

CASR PART 43 TWG Issues list						
Issue No	ISSUE TOPIC	ISSUE SPECIFICS	REG/MOS REFERENCE	RESOLUTION OPTIONS	RESOLUTION DECISION	COMMENTS
					thesame as current transferring from CAR or used aircraft from another country (e.g. USA, NZ).	
16	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?			LAMEs and maintenance organisations must comply with the relevant rules. Part 43 privileges are designed for private and aerial work sectors. Part 42/145 policies to be covered by other projects. CASA will need to ensure effective information is provided to maintenance providers.	
17	Aircraft records and traceability of parts/materials	During consultation it is evident that many believe 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)		<ul style="list-style-type: none"> • Adopt FAR policy • Do not harmonise and introduce prescriptive rules. 	Harmonise with the FARs. Records and traceability is required for managing airworthiness compliance, but the use of Form 1 (8130-3) authorised release certificate for articles and components is not mandated in Part 43.	Part 43 is not a lower standard of airworthiness, it is a different, outcome based means of ensuring airworthiness.
18	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		<ul style="list-style-type: none"> • Adopt FAR policy • Do not harmonise and introduce prescriptive, outdated, unclear rules. 	Harmonise with the FARs. The CASA MR is an acceptable means of compliance and for many privately owned, small aircraft it remains the preferred option.	Many in our industry have commented that they like the CASA MR form/concept. There is much support for retaining the CASA MR form and system, however it doesn't work well for many commercial (aerial work) operations. The MR system blurred the responsibilities of the RO to ensure the continuing airworthiness of the aircraft – CASR Part 43 will clarify that responsibility.
19	Acceptable data is a new concept for our industry. CASA current rules only ever talk about using data that is approved.	A LAME may use a range of data to carry out minor modifications and repairs provided it is acceptable. Acceptable data is basically technical data that has a generic approval		<ul style="list-style-type: none"> • Adopt FAR policy • Do not harmonise and introduce prescriptive rules. 	Harmonise with the FARs. Acceptable data for use in minor maintenance is a good and a sensible concept that helps reduce compliance burden on our GA industry. Responsibility remains on LAME to ensure data meets “acceptable” requirements. Engineering orders and 21.M approvals will no longer be required where acceptable (generic) data already exists for minor repairs and mods.	A new concept legally, but not uncommon in practice. CASA has already developed guidance on the subject.
20	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.		<ul style="list-style-type: none"> • Adopt FAR policy • Introduce proportionate defect reporting rules. 	Introduce defect reporting that covers major defects only (clearer and less administrative burden than CARs). Major defect reporting/recording/analysis is an ICAO requirement and a good safety feature.	
20						
21						
22						