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Maintenance of state aircraft

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Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

Artwork: James Baban.

This Civil Aviation Advisory Publication (CAAP) provides guidance, interpretation and explanation on complying with the Civil Aviation Regulations 1988 (CAR) or a Civil Aviation Order (CAO).

This CAAP provides advisory information to the aviation industry in support of a particular CAR or CAO. Ordinarily, the CAAP will provide additional 'how to' information not found in the source CAR, or elsewhere.

Civil Aviation Advisory Publications should always be read in conjunction with the relevant regulations/orders.

Audience

The intended audience for this civil aviation advisory publication (CAAP) is:

- civil maintenance organisations involved in maintenance of the Royal Australian Air Force (RAAF) 100 Squadron aircraft
- licensed aircraft maintenance engineers (LAMEs) carrying out maintenance on RAAF 100 Squadron aircraft
- Department of Defence, including RAAF 100 Squadron.

Purpose

This CAAP provides clarification of CASA's policy position with regard to maintenance of state aircraft by civil organisations and LAMEs.

The purpose of the CAAP is to:

- clarify the effect of civil legislation in relation to maintenance activities on state aircraft
- provide information on the use of CASA forms for recording maintenance on state aircraft
- provide information and guidance to LAMEs in relation to recency requirements of their Part 66 licence.

For further information

For further information or to provide feedback on this CAAP, visit CASA's [contact us](#) page.

Status

This version of the CAAP is approved by the National Manager, Airworthiness and Engineering Branch.

Table 1: Status

Version	Date	Details
v1.0	August 2026	Initial CAAP issue.

Contents

1	Reference material	5
1.1	Acronyms	5
1.2	References	5
2	Introduction	6
2.1	Background	6
3	Maintenance of state aircraft by civil organisations	7
3.1	Use of CASA forms	7
3.2	LAME recency requirements	7
4	Summary	8

1 Reference material

1.1 Acronyms

The acronyms and abbreviations used in this CAAP are listed in the table below.

Table 2: Acronyms

Acronym	Description
ADF	Australian Defence Force
AME	aircraft maintenance engineer
AMO	approved maintenance organisation under Part 145 of CASR
CAAP	civil aviation advisory publication
CAO	Civil Aviation Order
CAR	<i>Civil Aviation Regulations 1988</i>
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
LAME	licensed aircraft maintenance engineer
MOS	manual of standards
RAAF	Royal Australian Air Force

1.2 References

Legislation

Legislation is available on the Federal Register of Legislation website <https://www.legislation.gov.au/>

Table 3: Legislation references

Document	Title
Civil Aviation Order 104.0	Certificates of approval—application, grant and conditions
CAR 30	Certificates of approval
Paragraph 66.A.23(b) Part 66 MOS	Requalification requirements
Part 145 of CASR	Continuing Airworthiness—Part 145 Approved Maintenance Organisations

2 Introduction

2.1 Background

CASA provides for certification of ex-military, historical and replica aircraft via a special certificate of airworthiness in the limited category.

Operation of the ex-military aircraft, generally referred to as 'warbirds', is regulated under the provisions of Parts 91 and 132 of the *Civil Aviation Safety Regulations 1998* (CASR). Maintenance is regulated under Parts 4 and 4A of the *Civil Aviation Regulations 1988* (CAR) and Civil Aviation Order (CAO) 100.4.

In 2019, the Australian Defence Force (ADF) assumed ownership of several historical warbirds that were previously registered, operated and maintained under civil legislation. The aircraft became 'state aircraft' of the RAAF 100 Squadron and are maintained in accordance with Defence Aviation Safety Regulations.

The ADF contracts with civil maintenance providers (civil organisations) that have specialised skills and expertise to maintain the heritage aircraft fleet.

3 Maintenance of state aircraft by civil organisations

Civil aviation legislation does not apply to historic warbirds that are owned and operated by the RAAF (state aircraft). Maintenance of these aircraft is regulated by the ADF under Defence Aviation Safety Regulations.

Civil aviation legislation does not prevent civil organisations from undertaking maintenance on state aircraft. However, CASA does not approve particular civil organisations that provide maintenance services to the ADF and does not legislate how the maintenance is performed, documented and certified. These are all matters controlled by the ADF.

3.1 Use of CASA forms

Civil organisations and LAMEs carrying out maintenance on state aircraft under arrangements with the ADF may find some CASA forms convenient for recording and certifying the maintenance. CASA has no involvement in the use of any such forms and does not object to their use provided that the forms are not represented as having civil application.

Civil organisations and LAMEs who use CASA forms can satisfy this proviso by either making a notation on each document, entry or signature stating that the form or certification is not made under civil legislation. Alternatively, an umbrella entry can be made in the organisation's quality/procedures manual to that effect, which should be made available to CASA, the RAAF and the organisation's personnel as required.

3.2 LAME recency requirements

Under Part 66 of CASR, LAMEs may only perform maintenance certification or issue a certificate of release to service if they meet recent qualification or experience requirements. This requires that in the preceding two-year period:

- the aircraft engineer licence was granted
or
- the LAME has at least 6 months experience of exercising the privileges mentioned in the Part 66 Manual of Standards (MOS) of the licence
or
- a requalification for the licence has been met.

Maintenance and certification of state aircraft is not exercising a privilege of a Part 66 licence and therefore does not satisfy the recent experience requirements. However, requalification provides an alternative avenue that would enable recency requirement to be met.

Further detail on the requalification requirements are set out in paragraph 66.A.23(b) of the Part 66 MOS. The two requalification options that could be considered in relation to a LAME conducting maintenance on state aircraft are:

1. Carrying out maintenance of a kind that would be covered by the privileges of their AME licence for at least 100 days and maintaining evidence of carrying out that maintenance.
2. The LAME could be assessed by either a maintenance organisation with a CAR 30 certificate of approval or an AMO to determine if they continue to have the knowledge and skills necessary for the holder of the licence and relevant ratings. This assessment would need to follow a process for requalification based on competency-based standards set out in the organisation's system of quality control or the AMO's exposition (whichever is relevant).

4 Summary

CASA does not regulate maintenance of state aircraft.

Civil organisations may provide maintenance services on RAAF 100 Squadron aircraft subject to ADF regulations and control.

CASA forms may be used for recording and certifying maintenance, provided they are not purported to be issued in compliance with civil legislation.

LAMEs do not exercise the privileges of their Part 66 licence when carrying out maintenance on state aircraft. However, they can meet recency requirements through a requalification option set out in paragraph 66.A.23(b) of the Part 66 MOS (also see section 3.2 above).