



## **Mapping of Civil Aviation Orders to CASR Parts 91 and 138—Aerial work operations**

---

<b>Date</b>	April 2021
<b>Owner</b>	Branch Manager Flight Standards Branch
<b>Responsible Area Manager</b>	Branch Manager Regulation Implementation
<b>Effective Date</b>	April 2021
<b>Review Date</b>	December 2021

**For Flight Operations Regulations commencing on 02 December 2021**

© Civil Aviation Safety Authority

All material presented in this Guidance document is provided under a Creative Commons Attribution 4.0 International licence, with the exception of the Commonwealth Coat of Arms (the terms of use for the Coat of Arms are available from the **It's an Honour** website). The details of the relevant licence conditions are available on the Creative Commons website, as is the full legal code for the CC BY 4.0 license.



Attribution

Material obtained from this document is to be attributed to CASA as:

© Civil Aviation Safety Authority 2021.

This document becomes an uncontrolled document when printed. Refer to <[Document Control](#)> for current version.

This document contains guidance material intended to assist CASA officers, delegates and the aviation industry in understanding the operation of the aviation legislation. However, you should not rely on this document as a legal reference. Refer to the civil aviation legislation including the *Civil Aviation Act 1988* (Cth), its related regulations and any other legislative instruments—to ascertain the requirements of, and the obligations imposed by or under, the law.

## Glossary

### Acronyms and abbreviations

Acronym / abbreviation	Description
AIP	Aeronautical Information Publication
AMC/GM	Acceptable Means of Compliance and Guidance Material
AOC	Air Operator's Certificate
CAO	Civil Aviation Order
CAR	<i>Civil Aviation Regulations 1988</i>
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
ELT	emergency locator transmitter
GNSS	Global Navigation Satellite System
ICAO	International Civil Aviation Organization
MOS	Manual of Standards
MTOW	maximum take-off weight
OEI	one engine inoperative
PSEA	prescribed single-engine aeroplane

### References

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

Document	Title
Civil Aviation Regulations	<i>Civil Aviation Regulations 1988</i>
Civil Aviation Safety Regulations	<i>Civil Aviation Safety Regulations 1998</i>
Part 91 of CASR	General operating and flight rules
Part 138 of CASR	Aerial work operations
Part 91 AMC/GM	Part 91—General operating and flight rules Acceptable means of compliance and guidance material
Part 138 AMC/GM	Part 138—Aerial work operations Acceptable means of compliance and guidance material

## Revision History

Amendments/revisions of this Handbook are recorded below in order of the most recent first.

Version No.	Date	Parts/Sections	Details
1.0	April 2021	All	First issue

### Introduction

This document has been developed to assist pilots and operators transition to the new flight operations regulations that commence on 2 December 2021. It provides a guide to where provisions of the Civil Aviation Orders (CAO), as they would relate to aerial work operations, have been incorporated into Parts 91 and 138 of the *Civil Aviation Safety Regulations 1998* (CASR).

This document lists regulations from Parts 91 and 138 of CASR against CAO subsections, together with the location of requirements (if any) in the Manuals of Standards for Parts 91 and 138. If a similar provision is not contained in the CASR Parts, this is indicated by a '—'.

The comments provide a brief outline of some key differences between the existing and the new regulations, as well as other explanatory material and related provisions. Refer to the regulations and associated MOS sections for full requirements.

A number of the new regulations do not include the prescriptive requirements of the CAOs and are outcome-based, allowing the operator to develop their own procedures for compliance, which must be included in their operations manual.

This document does not contain every regulation that applies to an aerial work operation and it should be read in conjunction with the relevant CASR Parts. Guidance material is provided in AMC/GM documents and advisory circulars, available on the CASA website.

The Civil Aviation Orders, the new CASR Parts and the manuals of standards are available via the CASA website and on the Federal Register of Legislation website as follows:

- [Civil Aviation Orders](#)
- [Part 91 of CASR](#) and the [Part 91 Manual of Standards](#)
- [Part 138 of CASR](#) and the [Part 138 Manual of Standards](#).

The AMC/GM documents for Parts [91](#) and [138](#) are available on the CASA website.

Definitions are provided in the CASR Dictionary, the applicable CASR Part or its MOS. Refer to the CASA Flight operations regulations - consolidated dictionary, available on the [CASA website](#).



## Mapping of Civil Aviation Orders to CASR Parts 91 and 138—Aerial work operations

Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
20.2 Air service operations — safety precautions before flight								
20.2.2	Removal of locking and safety devices	—			91.245	Matters to be checked before take-off	Chapter 10 (10.02)	<b>Other provisions</b> 91.215 Authority and responsibilities of the pilot in command 91.095 Compliance with flight manual etc. 138.210 Compliance with flight manual
20.2.3	Security of doors and hatches	—						
20.2.4	Precautions before solo flight in aircraft fitted with dual controls	—						
20.2.5	Fuel system inspection	—			91.465	Contaminated, degraded or inappropriate fuels		
20.2.6	Fuel quantity measurement	138.285	Fuel procedures		91.455	Fuel requirements	Chapter 19	These provisions apply regardless of the MTOW of the aircraft.
		138.155	Content of operations manual					
20.3 Air service operations — Marshalling and parking of aircraft								
20.3.1	Application	—			—			
20.3.2	Responsibility for marshalling and parking aircraft	—			91.670	Standard visual signals		Regulation 91.670 of CASR prescribes that a person who displays a signal to an aircraft (other than a glider) for the purposes of marshalling the aircraft must use a standard visual signal.  <b>Other provisions</b> 138.280 Procedures for safety at aerodromes
20.3.3	Parking areas	—			—			Refer to Part 139 of CASR—Aerodromes for the requirements relating to designated parking areas on aerodromes.  Regulation 91.420 Parked aircraft not to create a hazard - is a new provision prescribing that an aircraft must not be parked in a place where it is a hazard to the movement of other aircraft.
20.3.4	Standard hand signals	—			91.670	Standard visual signals		<i>Standard visual signal</i> is defined in the CASR Dictionary. Details of marshalling signals are shown in Appendix 1 of the Part 91 AMC/GM.
Appendix 1	Standard hand signals to be used by ground personnel marshalling aircraft	—			—			
20.4 Provision and use of oxygen and protective breathing equipment								
20.4.1	Application	—			—			



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
20.4.2	Interpretation	—			—			
20.4.3	Equipment standards	—			Subpart 91.K	Equipment	Chapter 26 Division 26.11 (26.47)	Refer to CAO 108.26 for equipment standards.
20.4.4	Duties of crew members in relation to oxygen and protective breathing equipment	—			91.245	Matters to be checked before take-off	Chapter 10 (10.02(j))	
					91.565	Passengers—safety briefings and instructions	Chapter 20 Division 20.3	
20.4.5	Information to be included in operations manual and flight manual	138.155	Content of operations manual		—			<p>Paragraph 138.155 (1) (h) of CASR requires aerial work certificate holders to include in their operation's manual details about how they safely conduct and manage their operations in compliance with the civil aviation legislation.</p> <p>Subparagraph 138.305 (2) (c) (iii) of CASR requires the operations manual to include procedures to ensure the safety of a passenger carried on the aircraft.</p> <p><b>Other provisions</b> 138.305 Carriage of passengers—general Part 138 MOS Chapter 11</p>
20.4.6	Supplemental oxygen requirements for unpressurised aircraft	—			Subpart 91.K	Equipment	Chapter 26 Division 26.11 (26.43)	Part 91 of CASR prescribes new and simplified requirements for the carriage and use of supplemental oxygen.
20.4.7	Supplemental oxygen requirements for pressurised aircraft engaged in flights not above FL250	—			Subpart 91.K	Equipment	Chapter 26 Division 26.11 (26.43)	
20.4.8	Supplemental oxygen requirements for pressurised aircraft engaged in flights above FL250	—			Subpart 91.K	Equipment	Chapter 26 Division 26.11 (26.43, 26.44)	
20.4.9	First aid oxygen	—			Subpart 91.K	Equipment	Chapter 26 (26.47)	The Part 91 MOS prescribes new requirements for the carriage of first aid oxygen by pressurised aircraft that require at least 2 pilots by the aircraft flight manual. Until immediately before 2 December 2023, a relevant aircraft can either comply with requirements in CAOs 20.4 and 108.26, or carry first aid oxygen in accordance with the Part 91 MOS.
20.4.10	Protective breathing equipment	—			Subpart	Equipment	Chapter 26	



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
					91.K		(26.45 and 26.46)	
20.6 Continuation of flight with 1 or more engines inoperative								
20.6.2	Application	—			—			
20.6.3	Requirements	—			91.680	Pilot in command to report emergencies		
					91.685	Multi-engine aircraft—pilot in command to land at nearest suitable aerodrome if emergency occurs		
20.7.0 Aeroplane weight limitations - general								
20.7.0.2	Application	—			—			Declared density altitude charts have not been included in the CASR.
20.7.0.3	Definitions	—			—			Regulation 91.230 of CASR and Chapter 7 of the Part 91 MOS prescribe the requirements relating to flight preparation and weather assessments.  <b>Other provisions</b> 138.265 Flight preparation requirements
20.7.0.4	Declared density altitude charts (and Appendices 1-3)	—			—			
20.7.1 Aeroplane weight limitations - aeroplanes above 5 700 kg - all operations (piston-engined)								
		—			—			For take-off weight and landing weight limitations for aeroplanes above 5 700 kg, refer to the entries for CAO 20.7.1B.  The CASA P-series charts have not been included in the CASR.
20.7.1B Aeroplane weight and performance limitations - specified aeroplanes above 5700kg, or 2722 kg if driven by 2 or more jet engines - all operations								
20.7.1B.2	Application	—			—			The Part 138 MOS prescribes that the take-off performance and landing performance requirements stated in Chapter 9 of the Part 121 MOS apply to the following aeroplanes: <ul style="list-style-type: none"><li>a propeller-driven, multi-engine aeroplane with a MTOW of more than 5 700 kg</li><li>a jet-driven, multi-engine aeroplane with a MTOW of more than 2 722 kg.</li></ul>
20.7.1B.3	Definitions	—			—			





Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
								<b>Other provisions</b> 91.055 Aircraft not to be operated in manner that creates a hazard 91.095 Compliance with flight manual etc. 138.210 Compliance with flight manual
20.7.1B.4	Take-off weight limitations	138.435	Take-off performance	Chapter 18 Division 1	—			Part 121 MOS Chapter 9 Division 1 (9.02)
20.7.1B.5	Landing weight limitations	138.440	Landing performance		—			Part 121 MOS Chapter 9 Division 2 (9.10, 9.11, 9.12)
20.7.1B.6	Accelerate-stop and take-off distance required	138.435	Take-off performance		—			Part 121 MOS Chapter 9 Division 1 (9.03)
20.7.1B.7	Take-off climb performance	138.435	Take-off performance		—			Part 121 MOS Chapter 9 Division 1 (9.04, 9.05, 9.06, 9.07)
20.7.1B.8	En-route climb performance	138.435	Take-off performance		—			Part 121 MOS Chapter 9 Division 1 (9.07, 9.08)
20.7.1B.9	Approach climb performance	138.440	Landing performance		—			Part 121 MOS Chapter 9 Division 2 (9.12)
20.7.1B.10	Landing climb performance							
20.7.1B.11	Landing distance required	138.440	Landing performance		—			Part 121 MOS Chapter 9 Division 2 (9.10, 9.11, 9.13)
20.7.1B.12	Obstacle clearance requirements	138.435	Take-off performance		—			Part 121 MOS Chapter 9 Division 1 (9.04, 9.08)
20.7.1B.12A	Alternative take-off area requirements	138.435	Take-off performance		—			Part 121 MOS Chapter 9 Division 1 (9.04)
20.7.1B.14	Aeroplane configuration and procedures	138.210	Compliance with flight manual		91.095	Compliance with flight manual etc.		Paragraph 138.155 (1) (h) of CASR requires the operations manual to include details of each plan, process, procedure, program and system implemented by the operator to safely conduct and manage their aerial work operations in compliance with the civil aviation legislation.
		138.155	Content of operations manual					
20.7.4 Aeroplane weight and performance limitations - aeroplanes not above 5 700kg - private, aerial work (excluding agricultural) and charter operations								
20.7.4.2	Application	—			—			For aircraft to which section 18.05 of the Part 138 MOS refers, take-off performance and landing performance requirements are stated in Chapters 24 and 25 of the Part 91 MOS.
20.7.4.3	Definitions	—			—			
20.7.4.4	Take-off weight limitations	138.435	Take-off performance	Chapter 18 Division 3 (18.05 and 18.06)	—		Chapter 24	The prescriptive requirements contained in CAO 20.7.4 have not been included in the Part 91 MOS. The pilot in command is responsible for ensuring the aircraft has the performance to clear all obstacles by a safe margin.
20.7.4.5	Landing weight limitations	138.440	Landing performance		—		Chapter 25	
20.7.4.6	Take-off distance required	138.435	Take-off performance		—		Chapter 24	The Part 91 MOS prescribes the matters to be taken into account and the documents and data to be used when determining the performance of the aircraft.  Chapter 7 of the Part 138 MOS prescribes that for aerial work conducted in a



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
20.7.4.7	Take-off climb performance	138.435	Take-off performance		—		Chapter 24	<p>PSEA, the operations manual must include the procedures for PSEA operations that are specified in the Part 135 MOS. These include procedures for the take-off and initial climb stage of a flight. Refer to Chapter 8 of the Part 135 MOS.</p> <p><b>Other provisions</b></p> <p>91.055 Aircraft not to be operated in manner that creates a hazard</p> <p>91.215 Authority and responsibilities of pilot in command</p> <p>91.095 Compliance with flight manual etc.</p> <p>138.210 Compliance with flight manual</p> <p>138.450 Loading of aircraft</p> <p><b>Part 138 MOS Chapter 18, Division 2 – Take-off and landing performance – rotorcraft – aerial work certificate holders only</b></p> <p>(Whilst CAO 20.7.4 does not apply to rotorcraft, the below is included for information purposes).</p> <p>For operators who chose to operate their rotorcraft within the requirements of paragraph (a) of the definition of <i>OEI accountability</i>, take-off and landing performance requirements are specified in the Part 133 MOS. Part 133 of CASR introduces specific performance requirements for rotorcraft.</p> <p>Refer to the following for guidance on performance class operations:</p> <ul style="list-style-type: none"> <li>AC 133-01 - Performance class operations</li> <li>AC 133-02 - Performance Class 2 with exposure operations.</li> </ul> <p><i>OEI accountability</i> is defined in section 1.04 of the Part 138 MOS.</p>
20.7.4.8	En-route climb performance	—			—		—	
20.7.4.9	Landing climb performance	138.440	Landing performance		—		Chapter 25	
20.7.4.10	Landing distance required	138.440	Landing performance		—		Chapter 25	
20.7.4.12	Aeroplane configuration and procedures	138.155	Content of operations manual		—		—	Paragraph 138.155 (1) (h) of CASR requires the operations manual to include details of each plan, process, procedure, program and system implemented by the operator to safely conduct and manage their aerial work operations in compliance with the civil aviation legislation.
<b>20.9 Air service operations - precautions in refuelling, engine and ground radar operations</b>								
20.9.2	Application	—			—			
20.9.3	Fuel and oils	—			91.465	Contaminated, degraded or inappropriate fuels		<p>The responsibility for ensuring an aircraft is not fuelled with contaminated, degraded or inappropriate fuel has been extended to the fuel supplier and refueller.</p> <p><b>Other provisions</b></p> <p>91.095 Compliance with flight manual etc.</p> <p>138.210 Compliance with flight manual</p>
20.9.4	Fuelling of aircraft	138.302	Fuelling safety procedures		91.470	Fire hazards		



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
					91.480	Fuelling aircraft—electrical bonding		
					91.485	Equipment or electronic devices operating near aircraft		
					91.490	Fuelling turbine-engine aircraft—low-risk electronic devices		
					91.515	Fuelling aircraft if fuel vapour detected		
					91.475	Fuelling aircraft—fire fighting equipment		
20.9.5	Starting and ground operations of engines	138.280	Procedures for safety at aerodromes		91.470	Fire hazards		
20.9.6	Ground operation of aircraft radar equipment	—			—			These provisions have not been included in Part 138 or 91 of CASR. Refer to the following regulations for requirements relating to fire hazards and the operation of equipment during refuelling: <ul style="list-style-type: none"><li>91.470 Fire hazards</li><li>91.485 Equipment or electronic devices operating near aircraft.</li></ul> Refer to AC 91-25 - Fuel and oil safety <sup>1</sup> for guidance.  <b>Other provisions</b> 91.055 Aircraft not to be operated in a manner that creates a hazard
Appendix 1	Fire safety requirements to be met by mechanical and electrical equipment within 15 metres etc	—			—			
20.10 Hot refuelling - helicopters								
20.10.1	Meaning of hot refuelling	—			—			Referred to as <i>hot fuelling</i> in Part 138 of CASR.
20.10.1A	Application	—			—			
20.10.2	Operator's responsibilities	138.300	Hot fuelling		—			

<sup>1</sup> At the time of publication of this document, this AC is under development. Once published, it will be available from the CASA website.



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
20.10.3	Responsibilities of pilot in command	138.300	Hot fuelling		91.095	Compliance with flight manual etc.		
		138.210	Compliance with flight manual		—			
20.10.4	Procedures and equipment	138.300	Hot fuelling		91.475	Fuelling aircraft—fire fighting equipment		
20.10.5	Fuel loading	138.300	Hot fuelling		91.455	Fuel requirements	Chapter 19 (19.04, 19.05)	<b>Other provisions</b> 138.285 Fuel procedures
					91.480	Fuelling aircraft—electrical bonding		
20.10.6	Radio transmissions	—			—			<p>These provisions have not been included in Part 138 or 91 of CASR. Refer to the following regulations for requirements relating to the operation of equipment during fuelling, and the requirement for the operations manual to contain procedures:</p> <ul style="list-style-type: none"> <li>91.485 Equipment or electronic devices operating near aircraft</li> <li>91.490 Fuelling turbine—engine aircraft—low-risk electronic devices</li> <li>138.300 Hot fuelling</li> <li>138.302 Fuelling safety procedures.</li> </ul> <p>Refer to AC 91-25 - Fuel and oil safety<sup>2</sup> for guidance.</p>
20.10.7	Inspection and testing of fuel system	—			—			This provision has not been included in Part 138 or 91 of CASR; however, regulation 91.465 of CASR prescribes requirements relating to contaminated, degraded or inappropriate fuels.
<b>20.10.1 Hot refuelling - turbine engine aeroplane engaged in aerial work or private operations</b>								
20.10.1.1	Interpretation	—			—			<p>Referred to as <i>hot fuelling</i> in Part 91 of CASR.</p> <b>Other provisions</b> 138.285 Fuel procedures
20.10.1.2	Application	—			—			
20.10.1.3	Operator's or owner's responsibilities	138.300	Hot fuelling		—			
20.10.1.4	Responsibilities of pilot in command	138.300	Hot fuelling		—			
		138.210	Compliance with flight manual		91.095	Compliance with flight manual etc.		
20.10.1.5	Procedures and equipment	138.300	Hot fuelling		91.475	Fuelling		

<sup>2</sup> At the time of publication of this document, this AC is under development. Once published, it will be available from the CASA website.



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
						aircraft—fire fighting equipment		
20.10.1.6	Fuel loading	138.300	Hot fuelling		91.455	Fuel requirements	Chapter 19 (19.04, 19.05)	
					91.480	Fuelling aircraft—electrical bonding		
20.10.1.7	Radio transmissions							<p>These provisions have not been included in Part 138 or 91 of CASR. Refer to the following regulations for requirements relating to the operation of equipment during fuelling, and the requirement for the operations manual to contain procedures:</p> <ul style="list-style-type: none"><li>91.485 Equipment or electronic devices operating near aircraft</li><li>91.490 Fuelling turbine—engine aircraft—low-risk electronic devices</li><li>138.300 Hot fuelling</li><li>138.302 Fuelling safety procedures.</li></ul> <p>Refer to AC 91-25 - Fuel and oil safety<sup>3</sup> for guidance.</p>
20.10.1.8	Inspection and testing of fuel system							This provision has not been included in Part 138 or 91 of CASR; however, regulation 91.465 of CASR prescribes requirements relating to contaminated, degraded or inappropriate fuels.
<b>20.11 Emergency and life saving equipment and passenger control in emergencies</b>								
20.11.1	Application	—			—			
20.11.2	Definitions	—			—			
20.11.3	Maintenance of emergency and lifesaving equipment	—			Subpart 91.K	Equipment	Chapter 26 Division 26.1 (26.01)	<b>Other provisions</b> 91.245 Matters to be checked before take-off Part 91 MOS Chapter 10 (10.02(d))
20.11.5	Flotation equipment for overwater flights	—			Subpart 91.K	Equipment	Chapter 26 Division 26.14	<p>Part 91 of CASR includes revised provisions for:</p> <ul style="list-style-type: none"><li>the carriage, stowage and wearing of life jackets</li><li>determining the number of life rafts required.</li></ul> <p>Section 22.06 of the Part 138 MOS prescribes the fitting of a usage monitoring system for single-engine rotorcraft conducting marine pilot transfers, with effect from the beginning of 2 December 2023. (It is recommended that rotorcraft be fitted with a usage monitoring system sooner where it is feasible.) (For the future requirement to have a usage monitoring system fitted during</p>

<sup>3</sup> At the time of publication of this document, this AC is under development. Once published, it will be available from the CASA website.



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
								<i>other operations, refer to section 9.05 of the Part 138 MOS.)</i>
20.11.6	Emergency signalling equipment	—			Subpart 91.K	Equipment	Chapter 26 Division 26.12	'Automatic ELT' and 'survival ELT' replace the terms 'approved ELT' and 'approved portable ELT', respectively. Apart from a minor technical amendment included in the requirements for an automatic ELT, details are unchanged.
20.11.6A	Portable megaphones	—			—			
20.11.7	Survival equipment	Subpart 138.K	Equipment	Chapter 22 (22.08)	Subpart 91.K	Equipment	Chapter 26 Division 26.13 (26.62) Division 26.15 (26.64)	<b>Other provisions</b> 138.345 Survival equipment procedures
20.11.8	Accessories for water operations	—			Subpart 91.K	Equipment	Chapter 26 Division 26.14 (26.55)	
20.11.9	Illumination of emergency exits	—			—			
20.11.10	Emergency procedures	138.155	Content of operations manual		—			Paragraph 138.155 (1) (h) of CASR requires an operations manual to include details of each plan, process, procedure, program and system implemented by the operator to safely conduct and manage their aerial work operations.
20.11.11	Assignment of emergency duties	—			—			<b>Other provisions</b> 138.485 Competence 138.540 Composition, number, qualifications and training Part 138 MOS Chapter 23 (23.02 (3)) 138.580 Qualifications and training Part 138 MOS Chapter 25 (25.02) 138.155 Content of operations manual
20.11.12	Crew member proficiency in the execution of emergency procedures	—			—			<b>Other provisions</b> 138.475 Composition, number, qualifications and training Part 138 MOS Chapter 23 (23.02, 23.05) 138.540 Composition, number, qualifications and training Part 138 MOS Chapter 24 (24.02)
20.11.13	Cabin attendants	—			—			
20.11.14	Briefing of passengers	138.305	Carriage of passengers—general		91.540	Means of passenger communication		<b>Other provisions</b> 91.570 Passengers—safety directions by pilot in command 91.575 Passengers—compliance with safety directions
					91.565	Passengers—safety briefings and instructions	Chapter 20 Division 20.3	





Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
20.11.15	Demonstration of emergency evacuation procedures	—			—			
Appendix II	Criteria for ditching demonstration							
Appendix III	Designated remote areas	—			Subpart 91.K	Equipment	Chapter 26 Division 26.15	<i>remote area</i> has the meaning given in Division 26.15 of the Part 91 MOS.
Appendix IV	Crew member emergency procedures proficiency test	—			—			
<b>20.13 Air service operations - cockpit check systems</b>								
		—			—			<p>CASA approval of cockpit check systems is not required under the CASR.</p> <p>The following provisions relate to the compliance with flight manual instructions about the operation of an aircraft, and the availability and carriage of checklists:</p> <ul style="list-style-type: none"><li>• 91.095 Compliance with flight manual etc.</li><li>• 138.210 Compliance with flight manual</li><li>• 138.215 Availability of checklists.</li></ul> <p>Refer to the Part 138 AMC/GM document for guidance on regulation 138.215 and establishing, using and maintaining checklists.</p>
<b>20.16.1 Air service operations - loading - general</b>								
20.16.1.1	Application	—			—			
20.16.1.2	Definitions	—			—			
20.16.1.3	Loading system	138.450	Loading of aircraft		—			
20.16.1.5	Load sheets	138.460	Weight and balance documents	Chapter 21	—			
20.16.1.7	Passenger lists	—			—			
<b>20.16.2 Air service operations - loading - general</b>								
20.16.2.1	Application	—			—			
20.16.2.2	Definitions	—			—			
20.16.2.3	Restraint	—			91.585	Restraint and stowage of cargo		
					91.590	Restraint and		



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
						stowage of carry-on baggage		
20.16.2.4	Stowage	—			91.600	Carriage of cargo—general		
					91.605	Carriage of cargo—cargo compartments		Regulation 91.605 of CASR prescribes a new requirement to ensure fire fighting access to cargo compartments.
20.16.2.5	Cargo on a passenger seat	—			91.585	Restraint and stowage of cargo		Cargo carried on an unoccupied seat may exceed 77 kg if the seat manufacturer permits it. CASA approval of a seat loading scheme is not required.  <b>Other provisions</b> 91.095 Compliance with flight manual etc. 138.210 Compliance with flight manual
					91.610	Carriage of cargo—unoccupied seats		
20.16.2.6	Cargo in a pilot compartment	—			91.600	Carriage of cargo—general		
					91.610	Carriage of cargo—unoccupied seats		
20.16.2.7	Placarding	—			91.615	Carriage of cargo—loading instructions		<b>Other provisions</b> 91.060 Unauthorised travel or placing of cargo on aircraft
<b>20.16.3 Air service operations—carriage of persons</b>								
20.16.3.1	Application	—			—			Only an aerial work certificate holder may carry aerial work passengers.  <i>Aerial work passenger</i> is a new term and is defined in the CASR Dictionary. Section 2.02 of the Part 138 MOS contains prescriptions for classes of aerial work passengers.
20.16.3.2	Definitions	—			—			
20.16.3.3	Seats	138.375	Wearing of seatbelts and other restraint devices	Chapter 14	91.550	Seating for flight crew members		Regulation 91.550 of CASR prescribes the requirements for seating and wearing of seatbelts by flight crew members. Regulation 138.375 prescribes requirements about the wearing of seatbelts that must be met during an aerial work operation.
					91.555	Seating for crew members other than flight crew members		
					91.560	Restraint of infants and	Chapter 20 Division 20.2	Regulation 91.555 of CASR prescribes the requirements for seating and wearing of seatbelts by crew members other than flight crew. During an aerial work operation, regulation 91.555 does not apply and the requirements





Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
						children		about wearing seatbelts and other restraint devices are prescribed by regulation 138.375 and Chapter 14 of the Part 138 MOS.  <b>Other provisions</b> 91.060 Unauthorised travel or placing of cargo on aircraft 91.535 Crew safety during turbulence 91.545 Seating for persons on aircraft 91.565 Passengers—safety briefings and instructions Part 91 MOS Division 20.3 91.575 Passengers—compliance with safety directions  138.305 Carriage of passengers—general
					91.570	Passengers—safety directions by pilot in command		
20.16.3.4	Seat belts and safety harnesses	138.375	Wearing of seatbelts and other restraint devices	Chapter 14	91.550	Seating for flight crew members		
					91.540	Means of passenger communication		
					91.560	Restraint of infants and children	Chapter 20 Division 20.2	
					Subpart 91.K	Equipment	Chapter 26 Division 26.10 (26.42)	
					91.570	Passengers—safety directions by pilot in command		
20.16.3.5	Adjustment of seats	—			91.570	Passengers—safety directions by pilot in command		<b>Other provisions</b> 91.575 Passengers—compliance with safety directions
20.16.3.6	Cabin attendants	—			—			
20.16.3.6A	Manned balloons and hot air airships	—			—			
20.16.3.7	Aisles	—			—			<b>Other provisions</b> 91.600 Carriage of cargo—general (paragraph (2) (c))
20.16.3.8	Smoking	—			91.530	When smoking not permitted		Smoking is now taken to include electronic cigarettes.  <b>Other provisions</b> 91.565 Passengers—safety briefings and instructions
20.16.3.9	Stowage of loose articles	—			91.590	Restraint and stowage of carry-on baggage		<b>Other provisions</b> 91.170 Operation of portable electronic devices (prescribes that the pilot in command may permit the use of portable electronic devices during flight



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
					91.600	Carriage of cargo—general		(rather than requiring them to be stowed at prescribed times) if the use will not affect the safety of the aircraft).
20.16.3.10	Passenger service	—			—			
20.16.3.11	Carriage of passengers in seats at which dual controls are fitted	138.305	Carriage of passengers—general	Chapter 11	91.155	Manipulating flight controls		
					91.565	Passengers—safety briefings and instructions	Chapter 20 Division 20.3 (20.06(r))	
20.16.3.12	Passenger capacity	—			—			The provisions in CAO 20.16.3 subsection 12 for the carriage of excess passengers have not been included in CASR.  <b>Other provisions</b> 91.095 Compliance with flight manual etc. 138.210 Compliance with flight manual 138.450 Loading of aircraft
20.16.3.13	Carriage of infants and children	—			91.560	Restraint of infants and children	Chapter 20 Division 20.2	<b>Other provisions</b> 91.570 Passengers—safety directions by pilot in command
20.16.3.14	Persons or passengers who require assistance due to sickness, injury or disability	—			91.545	Seating for persons on aircraft		<b>Other provisions</b> 138.305 Carriage of passengers—general
					91.565	Passengers—safety briefings and instructions	Chapter 20 Division 20.3 (20.06(p), 20.06(q))	
20.16.3.15	Carriage of parachutists	—			—			
<b>20.17 Air service operations - use of military aerodromes by civil aircraft</b>								
		—			—			Regulation 91.410 of CASR authorises the use of certain places as aerodromes. An aerodrome for which an arrangement under section 20 of the Act is in force (subparagraph 91.410 (2) (a) (iii)) means a Defence aerodrome that is available for civilian use.  Prior permission must be obtained from the appropriate military authority before landing at any military aerodrome (except joint-user aerodromes). Refer to AIP Australia.
<b>20.18 Aircraft equipment - basic operational requirements</b>								
20.18.2	Definitions	—			—			
20.18.3	Instrumentation for flight under	138.210	Compliance with flight manual		91.095	Compliance with		



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
	the Visual Flight Rules (the V.F.R.)					flight manual etc.		<b>Other provisions</b> Section 26.40 of the Part 91 MOS - flight crew intercommunications system — VFR flight
					Subpart 91.K	Equipment	Chapter 26 Division 26.4 (26.11 (4))	
20.18.3A	Operations to which flight and navigation equipment requirements do not apply	—			—			
20.18.4	Equipment for flight under the Instrument Flight Rules (the I.F.R.)	138.210	Compliance with flight manual		91.095	Compliance with flight manual etc.		Section 26.41 of the Part 91 MOS - flight crew intercommunications system— IFR flights, prescribes new requirements for relevant aircraft.
					Subpart 91.K	Equipment	Chapter 26 Divisions 26.4 (26.12(3)) and 26.10 (26.41)	
20.18.5	Windshield clear vision equipment	—			—			
20.18.6	Recording equipment	—			91.650	Flight recorders— preserving recordings of immediately reportable matters		Regulation 91.650 prescribes that aircraft fitted with an operative flight data recorder, operative cockpit voice recorder or operative combination recorder are required to preserve recordings of immediately reportable matters. The recorder must also be preserved. The retention time has been reduced.
					Subpart 91.K	Equipment	Chapter 26 Division 26.9	<b>Other provisions</b> 91.645 Availability of instructions for flight data and combination recorders
20.18.7	Assigned altitude indicator and altitude alerting system	—			Subpart 91.K	Equipment	Chapter 26 Divisions 26.1, 26.2 (26.03), 26.8	The Part 91 MOS sets out the circumstances in which flight with inoperative altitude alerting equipment or an assigned altitude indicator is permitted.
20.18.8	Radiation indicator	—			—		Chapter 26 Division 26.6 (26.20)	
20.18.9	Ground proximity warning system	—			—			
20.18.9B	Directions relating to carriage and use of automatic dependent surveillance -	—			Subpart 91.K	Equipment	Chapter 26 Division 26.16	



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
	broadcast equipment							
20.18.9BA	Instructions—SSR transponder equipment	—			Subpart 91.K	Equipment		
20.18.9C	Standards for Mode S transponder equipment	—			Subpart 91.K	Equipment	Chapter 26 Division 26.16 (26.67, 26.70)	
20.18.9D	Directions for mandatory GNSS equipment for I.F.R. flight	—			Subpart 91.K	Equipment	Chapter 26 Divisions 26.3 (26.08) and 26.4 (26.12)	
20.18.9E	Carriage of Mode S transponder equipment	—			Subpart 91.K	Equipment	Chapter 26 Division 26.16	
20.18.10	Serviceability	Subpart 138.K	Equipment	Chapter 22 (22.05)	91.150	Operating aircraft with inoperative equipment—placarding		
Appendix I	Instruments required for flight under the V.F.R.	—			Subpart 91.K	Equipment	Chapter 26 Divisions 26.3 (26.06) and 26.4 (26.10)	
Appendix II	Instruments required for aeroplanes engaged in RPT operations, and aeroplanes engaged in charter operations which have a maximum take-off weight greater than 5 700 kg	—			—			
Appendix III	Instruments required for aeroplanes with a maximum take-off weight not greater than 5 700 kg engaged in charter operations under the I.F.R. (except night V.M.C.) excluding freight only charter operations	—			—			
Appendix IV	Instruments required for aeroplanes engaged in aerial work and private operations	—			Subpart 91.K	Equipment	Chapter 26 Division 26.3 (26.07 and	



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
	under the I.F.R. (including night V.M.C.), charter operations under night V.M.C., I.F.R. freight only charter operations in aeroplanes with a maximum take-off weight not greater than 5 700 kg						26.08)	
Appendix V	Electric lighting equipment flight under the I.F.R. at night (including night V.M.C.)	—			Subpart 91.K	Equipment	Chapter 26 Division 26.7	The Part 91 MOS prescribes a new requirement for cabin lighting. It must enable occupants to see and use seatbelts and oxygen facilities, if any, and to illuminate the normal and emergency exits.
Appendix VI	Instruments required for V.F.R. operations —helicopters	—			Subpart 91.K	Equipment	Chapter 26 Division 26.4 (26.10)	
Appendix VII	Instruments required for I.F.R. operations in helicopters (except night V.M.C.)	—			Subpart 91.K	Equipment	Chapter 26 Division 26.4 (26.12)	
Appendix VIII	Instruments required for night V.M.C. flight in helicopters except while engaged in agricultural operations	—			Subpart 91.K	Equipment	Chapter 26 Division 26.4 (26.11)	<b>Other provisions</b> 138.410 Manual of Standards may prescribe requirements for external load operations Part 138 MOS Chapter 15 (15.11) Subpart 138.K—Equipment Part 138 MOS Chapter 22 (22.07)
Appendix IX	Instruments required for helicopters engaged in night V.M.C. agricultural operations	—			—			
Appendix X	Instruments required for manned free balloons and hot air airships for flight by day under the V.F.R.	—			—			
Appendix XI	Approved equipment configuration — ADS-B transmitting equipment — IFR and VFR flight	—			Subpart 91.K	Equipment	Chapter 26 Division 26.16	
Appendices XII -XIV	Approved equipment configuration — Mode S transponder with Class B TABS position source device, Integrated TABS device, EC device — VFR flight below FL290 only	—			—			



Civil Aviation Orders	Part 138 of CASR	Part 138 MOS	Part 91 of CASR	Part 91 MOS	Comments			
20.22 Taxiing of aircraft by persons other than licensed pilots								
		—		—	Refer to Part 64 of CASR—Authorisations for non-licensed personnel.			
20.91 (Instructions and directions for performance-based navigation) Instrument 2014								
		—		91.287	IFR flights	Chapter 14		
				91.660	Performance-based navigation	Chapter 22		
29.5 Air service operations - Miscellaneous dropping of articles from aircraft in flight								
		138.275	Minimum height rules	Chapter 9			For definitions refer to section 1.04 of the Part 138 MOS.	
		138.305	Carriage of passengers—general	Chapter 11	—			
		138.370	Operator must conduct risk assessments	Chapter 13	—			
		138.375	Wearing of seatbelts and other restraint devices	Chapter 14	—			
		138.425	Manual of Standards may prescribe requirements for dispensing operations	Chapter 16	—			
29.6 Helicopter external sling load operations								
		138.275	Minimum height rules	Chapter 9	—		For definitions refer to section 1.04 of the Part 138 MOS.  Subregulation 138.210 (2) of CASR prescribes that for a flight involving an aerial work operation, the requirements and limitations of the aircraft flight manual instructions must be complied with. Subregulation 138.210 (3) provides an exception to this if the prescribed circumstances apply. Refer to Chapter 8 of the Part 138 MOS.	
		138.305	Carriage of passengers—general	Chapter 11	—			
		138.370	Operator must conduct risk assessments	Chapter 13	—			
		138.400	Certain night operations prohibited unless operation is an emergency service operation or approved by CASA		—			
		138.410	Manual of Standards may prescribe requirements for external load operations	Chapter 15	—			



Civil Aviation Orders	Part 138 of CASR	Part 138 MOS	Part 91 of CASR	Part 91 MOS	Comments		
29.8 Ferry flight of aeroplanes with 1 engine inoperative							
		—		—			
29.10 Air service operations — aircraft engaged in aerial stock mustering operations — low flying permission							
		138.275	Minimum height rules	Chapter 9 (9.01, 9.02, 9.03)	—		For definitions refer to section 1.04 of the Part 138 MOS.
		138.305	Carriage of passengers— general	Chapter 11 (11.06)	—		
		138.370	Operator must conduct risk assessments	Chapter 13	—		
		138.430	Manual of Standards may prescribe requirements for task specialist operations	Chapter 17 Divisions 1 and 2	—		
		138.500	Qualification as pilot in command	Chapter 17 Divisions 1 and 2 Chapter 23	—		
29.11 Air service operations — helicopter winching and rappelling operations							
		138.275	Minimum height rules	Chapter 9	—		For definitions refer to section 1.04 of the Part 138 MOS.  Subregulation 138.210 (2) of CASR prescribes that for a flight involving an aerial work operation, the requirements and limitations of the aircraft flight manual instructions must be complied with. Subregulation 138.210 (3) provides an exception to this if the prescribed circumstances apply. Refer to Chapter 8 of the Part 138 MOS.
		138.305	Carriage of passengers— general	Chapter 11	—		
		138.370	Operator must conduct risk assessments	Chapter 13	—		
		138.375	Wearing of seatbelts and other restraint devices	Chapter 14	—		
		138.400	Certain night operations prohibited unless operation is an emergency service operation or approved by CASA		—		
		138.410	Manual of Standards may prescribe requirements for external load operations	Chapter 15	—		
		Subpart 138.K	Equipment	Chapter 22 (22.07)	—		
		138.500	Qualification as pilot in	Chapter 23			





Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
			command	Division 2				
		Division 138.P.1	Air crew members	Chapter 24	—			
		Division 138.P.2	Task specialists	Chapter 25	—			
48.1 Civil Aviation Order 48.1 Instrument 2019								
		—			—			<p>The requirement to comply with the CAO 48.1 fatigue management rules will continue beyond the 2 December 2021 commencement of the CASR flight operations regulations. These rules will be incorporated into the CASR in due course.</p> <p><b>Other provisions</b></p> <p>138.150 Operators who are required to have a crew fatigue management system</p> <p>Part 138 MOS Chapter 6</p> <p>91.520 Crew members to be fit for duty (requirements that apply for all crew members).</p>
52.1 Use of airspace - Directions under r 99AA about the use of class A airspace								
		—			91.655	RVSM airspace		<p>The Part 91 MOS prescribes that flight in RVSM airspace must be conducted in accordance with procedures published in the authorised aeronautical information.</p> <p>For the definition of <i>authorised aeronautical information</i>, refer to the CASA Flight operations regulations - consolidated dictionary.</p> <p><b>Other provisions</b></p> <p>91.255 Air traffic services—prescribed requirements</p> <p>Part 91 MOS Chapter 11 Division 11.1 (11.07)</p> <p>91.630 Use of radio—broadcasts and reports</p> <p>Part 91 MOS Chapter 21 Division 21.2 (Table 21.05(1) item 7 and 21.08)</p> <p>Part 91 MOS Chapter 11 Division 11.1 (11.07)</p>
82.0 Civil Aviation Order 82.0 Instrument 2014								
82.0.1	Application	—			—			<p>The requirement to hold an air operator certificate (AOC) for aerial work operations has been removed. Regulation 138.030 prescribes the requirement to hold an aerial work certificate.</p>
82.0.2	Definitions	—			—			<p><b>Other provisions</b></p> <p>138.010 Definition of <i>aerial work operation</i> etc.</p>





Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
								Part 138 MOS Chapter 1 - definitions of <i>aerial work operator</i> , <i>aerial work certificate holder</i> , <i>limited aerial work operation</i> , <i>limited aerial work operator</i>
82.0.3	Conditions relating to 'borrowed' certificates	—			—			
82.0.3A	Conditions on all passenger-carrying aeroplane operations to remote islands	—			—			
82.0.3B	En route performance for 3 or 4 turbine-engined aeroplanes	—			—			
82.0.3BA	Distance limitations—piston-engined aeroplanes	—			—			
82.0.3BB	Distance limitations—19 passengers or less and exceeding 5,700kg MTOW	—			—			
82.0.3BC	Distance limitations—more than 19 passengers or 3,410 kg payload	—			—			
82.0.3BD	Polar operations	138.385	Procedures in relation to polar operations		—			
82.0.3C	Conditions relating to charter substitutions	—			—			
82.0.3D	Condition for use of NVD by an AOC holder	138.350	NVIS flights	Chapter 12	—			The Part 138 MOS prescribes that the use of a night vision imaging system must be in accordance with the requirements in CAO 82.6. Refer to the entries made against CAO 82.6 below.  <b>Other provisions</b> 138.275 Minimum height rules Part 138 MOS Chapter 9 (9.02, 9.04, 9.23) Part 138 MOS Chapter 11 (11.01, 11.03, 11.04)
82.0.3E	Condition for use of flight crew MP(A)L	—			—			
82.0.4	General AOC conditions—safety operational specifications	—			—			
82.0.5	Chief Pilot	—			—			The position previously titled 'chief pilot' is referred to as the 'head of operations'. Part 138 of CASR prescribes the qualifications and experience of the head of operations and the responsibilities of the position. Refer to the following regulations: <ul style="list-style-type: none"><li>138.090 Qualifications and experience of head of operations</li><li>138.095 Responsibilities of head of operations</li></ul>



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
								<ul style="list-style-type: none"><li>138.120 Additional qualification and experience requirements for key personnel.</li></ul> <p>Subregulation 138.090 (4) prescribes that CASA may direct the head of operations, or the proposed head of operations, to undertake an assessment.</p> <p>For the definition of <i>key personnel</i> refer to the CASA Flight operations regulations - consolidated dictionary, available on the CASA website.</p>
82.0.6	Variation of conditions or obligations	Division 138.B.3	Changes relating to aerial work operators		—			<b>Other provisions</b> 138.012 Definition of <i>significant change</i>
82.0.7	Primacy of synthetic training devices in training	—			—			Part 91 of CASR places restrictions on the causing or simulating of instrument and engine failures in aircraft. Refer to the following subdivisions: <ul style="list-style-type: none"><li>91.D.11.1—Causing or simulating instrument failure etc.</li><li>91.D.11.2—Causing or simulating engine failure etc. for aeroplanes</li><li>91.D.11.3—Causing or simulating engine failure etc. for rotorcraft.</li></ul> <b>Other provisions</b> 61.205 When training must not be conducted in aircraft
82.0.8	Pilot with co-pilot endorsement	—			—			Civil Aviation Order 40.1.0 has been repealed. Chapter 23 of the Part 138 MOS prescribes the requirements for flight crew training and checking.
82.0.8A	Aircraft ratings — aeroplanes	—			—			Chapter 23 of the Part 138 MOS prescribes the requirements for flight crew training and checking. It contains requirements that apply whether or not the operator is required by regulation 138.125 to have a training and checking system.  <b>Other provisions</b> 138.475 Composition, number, qualifications and training Part 138 MOS Chapter 23 Division 1 138.500 Qualification as pilot in command Part 138 MOS Chapter 23 Division 2
82.0.8B	Recent experience requirements — aeroplanes	—			—			
82.0.8C	Aircraft ratings — helicopters	—			—			
82.0.9	Training and checking manuals	138.155	Content of operations manual		—			Regulation 138.155 prescribes that the operator's operations manual must include information about plans, processes, procedures, programs and systems. These may be set out in one or more operator manuals.  For operators who are required by regulation 138.125 of CASR to have a training and checking system, the system must meet the requirements prescribed by the following regulations: <ul style="list-style-type: none"><li>138.130 Requirements for flight crew</li><li>138.135 Requirements for other operational safety-critical personnel.</li></ul> <p>The training and checking system must include a description of how training</p>



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
								and checking is conducted, competence is assessed, an auditable system for maintaining records and other procedures and information.  For guidance on training and checking, refer to the AMC/GM document for Part 138 and AC 138-02 – Training and checking systems <sup>4</sup> , available on the CASA website.  <b>Other provisions</b> 138.035 Application for aerial work certificate (paragraph (3) (b)) Division 138.B.5—Training and checking Part 138 MOS Chapter 23
82.0.10	Mandatory training and checking in synthetic training devices	—			—			Part 91 of CASR places restrictions on the causing or simulating of instrument and engine failures in aircraft. Refer to the following subdivisions: <ul style="list-style-type: none"><li>91.D.11.1—Causing or simulating instrument failure etc.</li><li>91.D.11.2—Causing or simulating engine failure etc. for aeroplanes</li><li>91.D.11.3—Causing or simulating engine failure etc. for rotorcraft</li></ul> <b>Other provisions</b> 61.205 When training must not be conducted in aircraft
82.0.11	Use of electronic flight bags (EFB)	—			—			<b>Other provisions</b> 91.175 Operation of portable electronic devices by crew members
Appendix 1	Chief Pilot - approval, responsibilities etc	—			—			Refer to the entries for subsection 5.
Appendix 2	Adequate aerodrome — physical requirements	—			—			
Appendices 3 - 5	EDTO approval and conditions	—			—			
Appendix 6	Polar operations	138.385	Procedures in relation to polar operations		—			
Appendix 7	MP(A)L Line Check — ICAO Evaluation Form	—			—			
Appendix 8	Requirements for use of qualified synthetic training devices for other aircraft and aircraft types	—			—			
Appendix 8B	Proficiency Check	—			—			Part 91 of CASR places restrictions on the causing or simulating of instrument and engine failures in aircraft. Refer to the following subdivisions: <ul style="list-style-type: none"><li>91.D.11.1—Causing or simulating instrument failure etc.</li></ul>

<sup>4</sup> At the time of publication of this document, this AC is under development. Once published, it will be available from the CASA website.



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
								<ul style="list-style-type: none"><li>91.D.11.2—Causing or simulating engine failure etc. for aeroplanes</li><li>91.D.11.3—Causing or simulating engine failure etc. for rotorcraft.</li></ul> <b>Other provisions</b> 138.475 Composition, number, qualifications and training Part 138 MOS Chapter 23 Division 1 (23.03)
Appendix 8C	Minimum aeronautical experience requirements to conduct charter, or regular public transport, operations in a type of helicopter	—			—			<b>Other provisions</b> 138.500 Qualification as pilot in command Part 138 MOS Chapter 17 Division 2 (17.02, 17.05) Part 138 MOS Chapter 23 Division 2
Appendix 9	Requirements to be met for the use of an EFB	—			—			
<b>82.1 Conditions on air operators' certificates authorising charter and aerial work operations</b>								
82.1.1	Application of conditions	—			—			The requirement to hold an air operator certificate (AOC) for aerial work operations has been removed. Regulation 138.030 prescribes the requirement to hold an aerial work certificate.  <b>Other provisions</b> 138.010 Definition of <i>aerial work operation</i> etc. Part 138 MOS Chapter 1 - definitions of <i>aerial work operator</i> , <i>aerial work certificate holder</i> , <i>limited aerial work operation</i> , <i>limited aerial work operator</i>
82.1.2	Obligations in relation to organisation and facilities	Division 138.B.4	Organisation and personnel		—			The position previously titled 'chief pilot' is referred to as the 'head of operations'. Part 138 of CASR prescribes the qualifications and experience of the head of operations and the responsibilities of the position. Refer to the following regulations: <ul style="list-style-type: none"><li>138.090 Qualifications and experience of head of operations</li><li>138.095 Responsibilities of head of operations</li><li>138.120 Additional qualification and experience requirements for key personnel.</li></ul> Regulation 138.410 of CASR prescribes that certain operators must have a safety management system.  Some provisions in the flight operations CASR Parts will be deferred. For information about deferred provisions, refer to AC 1-03 – Transitioning to the new flight operations regulations, available on the CASA website.  <b>Other provisions</b> 138.040 Issue of aerial work certificate 138.145 Safety management system requirements
		138.155	Content of operations manual					



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
								138.170 Personnel training and checking records
82.1.3	Obligations in relation to training and checking	138.125	Operators who are required to have a training and checking system	Chapter 4	—			<p>Part 138 of CASR prescribes training and checking requirements for all aerial work operators and introduces the requirement for certain aerial work operators to have a training and checking system.</p> <p>Training and checking requirements are prescribed for:</p> <ul style="list-style-type: none"> <li>flight crew</li> <li>air crew members</li> <li>task specialists.</li> </ul> <p>For guidance on training and checking, refer to the AMC/GM document for Part 138 and AC 138-02 – Training and checking systems<sup>5</sup>, available on the CASA website.</p> <p>Some provisions in the flight operations CASR Parts will be deferred. For information about deferred provisions, refer to AC 1-03 – Transitioning to the new flight operations regulations, available on the CASA website.</p> <p><b>Other provisions</b></p> <p>138.012 Definition of <i>significant change</i></p> <p>Division 138.B.3—Changes relating to aerial work operators</p> <p>138.170 Personnel training and checking records</p>
		138.130	Requirements for flight crew					
		138.135	Requirements for other operational safety-critical personnel					
		138.475	Composition, number, qualifications and training	Chapter 23				
		138.505	Training and checking to be conducted by certain persons	Chapter 23 Division 3				
		138.540	Composition, number, qualifications and training	Chapter 24				
		138.550	Training and checking to be conducted by certain persons	Chapter 24 (24.03)				
		138.580	Qualifications and training	Chapter 25 (25.03)				
		138.590	Training and checking to be conducted by certain persons	Chapter 25 (25.03, 25.04)				
82.1.4	Obligations in relation to flight crew requirements	—			—			<p>Refer to the following regulations and MOS sections for requirements in relation to the pilot in command:</p> <ul style="list-style-type: none"> <li>138.500 Qualification as pilot in command Part 138 MOS Chapter 17 (17.02, 17.05) Part 138 MOS Chapter 23 Division 2</li> <li>138.375 Minimum height rules Part 138 MOS Chapter 9 (9.08).</li> </ul> <p><b>Other provisions</b></p> <p>138.480 Training for new or inexperienced flight crew members</p>

<sup>5</sup> At the time of publication of this document, this AC is under development. Once published, it will be available from the CASA website.



Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
82.1.5	Obligations in relation to foreign registered aircraft	—			—			
82.1.6	Obligations in relation to operating different aircraft models	138.155	Content of operations manual					<b>Other provisions</b> 138.210 Compliance with flight manual 91.095 Compliance with flight manual etc.
		138.485	Competence					
82.1.7	Obligations in relation to AOC Holder's Safety Questionnaire	—			—			
Appendix 1	Facilities and documentation	138.195	Reference library		—			<b>Other provisions</b> 138.040 Issue of aerial work certificate
		138.155	Content of operations manual					
		138.165	Providing personnel with operations manual					
		Division 138.B.9	Records and documents					
Appendix 2	Training and checking organisation	138.095	Responsibilities of head of operations		—			The training and checking system must include a description of how training and checking is conducted, competence is assessed, an auditable system for maintaining records and other procedures and information.  <b>Other provisions</b> 138.035 Application for aerial work certificate (paragraph (3) (b)) 138.155 Content of operations manual 138.170 Personnel training and checking records 138.175 Availability of records 138.505 Training and checking to be conducted by certain persons
		138.105	Responsibilities of head of training and checking					
		138.155	Content of operations manual					
		138.165	Providing personnel with operations manual					
Appendix 3	Directions relating to carriage and use of automatic dependent surveillance – broadcast equipment	—			Subpart 91.K	Equipment	Chapter 26 Division 26.16	
Appendix 3A	Standards for Mode S transponder equipment	—			Subpart 91.K	Equipment	Chapter 26 Division 26.16	
Appendix 4	ADS-B	—			Subpart 91.K	Equipment	Chapter 26 Division 26.16	
<b>82.6 Night vision imaging system - helicopters</b>								
		—			—			Regulation 138.350 of CASR prescribes NVIS requirements for aerial work operations (the Part 91 NVIS requirements do not apply).  Chapter 12 of the Part 138 MOS currently prescribes that use of NVIS in an





Civil Aviation Orders		Part 138 of CASR		Part 138 MOS	Part 91 of CASR		Part 91 MOS	Comments
								<p>aerial work operation must be in accordance with the requirements in CAO 82.6. A limited aerial work operator must not use NVIS.</p> <p>The operations manual must contain certain procedures for using a night vision imaging system during an IFR flight or a VFR flight at night.</p> <p>The movement of relevant CAO 82.6 content into the CASR is currently the subject of active work by CASA, with a dedicated Technical Working Group consisting of industry members already established. CASA intends to consult with this working group, and publicly consult NVIS related MOS amendments (whether Part 91, 133 or 138) in the 1st half of 2021.</p>
95.7.2 Exemption of helicopters engaged in rappelling, sling load or winching operations from compliance with certain flight manual limitations								
		138.210	Compliance with flight manual	Chapter 8				Subregulation 138.210 (2) of CASR prescribes that for a flight involving an aerial work operation, the requirements and limitations of the aircraft flight manual instructions must be complied with. Subregulation 138.210 (3) provides an exception to this if the prescribed circumstances apply. Refer to Chapter 8 of the Part 138 MOS.
95.7.3 Exemption of certain helicopters engaged in transferring marine pilots from compliance with subregulation 174B of the <i>Civil Aviation Regulations 1988</i>								
		138.305	Carriage of passengers—general	Chapter 11				138.125 Operators who are required to have a training and checking system 138.140 Operators who are required to have a safety management system
		138.430	Manual of standards may prescribe requirements for task specialist operations	Chapter 17 Division 4				
		Subpart 91.K	Equipment					
		Subpart 138.K	Equipment	Chapter 22 (22.06)				
		138.475	Composition, number, qualifications and training	Chapter 23				
		138.500	Qualification of pilot in command	Chapter 23 (23.08)				
95.23 Exemption from subregulations 178(1) and (2) of the <i>Civil Aviation Regulations 1988</i> — for offshore and coastal surveillance and search and rescue operations								
		138.275	Minimum height rules	Chapter 9				