



**CONTINUING AIRWORTHINESS AND MAINTENANCE REGULATIONS PROJECT FOR AIRCRAFT CURRENTLY ENGAGED IN CHARTER OPERATIONS - ASAP TECHNICAL WORKING GROUP TASKING INSTRUCTIONS AND **FIRST** TWG MEETING REPORT**

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

The Technical Working Group 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 were endorsed by the ASAP on 14 March 2019:

- Ensure compliance with the standards set by the ICAO for commercial air transport operation:
  - Annex 6 Part 1 — International Commercial Air Transport — Aeroplanes
  - Annex 6 Part III, Section II — International Commercial Air Transport — Helicopters
- Facilitate harmonisation with legislation of leading aviation states, as applicable for the Australian environment
- Ensure compatibility with the new flight operations regulations
- Ensure regulatory requirements are proportionate to the risk associated with the relevant operational classification
- Provide transitional strategies to minimise the disruption to the industry
- Consider the economic and cost impact on individuals, businesses and the community in the development and finalisation of new or amended regulatory changes.

**SPECIFIC OBJECTIVES**

The project has two key components:

1. **Detailed policy development.** Review the relevant existing Australian legislation, ICAO standards and foreign legislations and determine:
  - a. detailed policy proposals for the new Australian legislation.
  - b. transitional strategies to minimise the disruption to current industry.
2. **Legislation development.** Legislation to be drafted to reflect the policies settled in stage 1.

Timelines for specific outputs are (tentative):

- Project launch: March 2019
- **Technical Working Group meeting: April 2019**
- Public consultation on detailed policy: July 2019
- Policy finalisation: November 2019
- **Technical Working Group meeting December 2019**
- Public consultation of legislation and guidance material: March 2020
- Regulatory package to Department: May 2020
- Implementation: To be established, in consultation with relevant stakeholders.

## REPORTING ARRANGEMENTS

The Technical Working Group will provide a status report to the regular meetings of the ASAP on the progress.

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

## ROLES AND RESPONSIBILITIES

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

## CONSENSUS

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

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

## MEMBERSHIP

Shannon Wells	Chris Schrapel	Richard Anderson
Sheridan Austin	Colin Miller*	Ernie Shapanis
Jake Weston*	Jeff Boyd	Andrew Bishop
Mike Higgins	Warren Bossie	

*\* Attended Wednesday 21 August and Thursday 22 August only.*

The TWG CASA Lead is Mr Iftekhar Ahmed.

The ASAP Secretariat was represented by Matt Di Toro.

**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 – 21-23 August 2019**

The purpose of this TWG is to discuss Key Principles and to assist CASA in developing the proposed policy for continuing airworthiness and maintenance regulations for aircraft currently engaged in charter operations.

Although the Tasking instructions have outlined a tentative timeline for the development of these regulations, it is the intention that this TWG will review the proposed policy - either remotely or by re-convening - prior to CASA seeking industry feedback through a formal public consultation. CASA would then analyse the feedback and provide to the TWG its Summary of Consultation (SOC) along with a final proposed policy. It is at this stage that the TWG will be expected to provide the ASAP with its final advice on whether this TWG supports the proposed policy in order for the ASAP to inform the CASA Director of Aviation Safety (DAS).

**A. Were the TWG members able to commence the development of a policy based upon the Key Principles outlined in the tasking instructions?**

YES /  NO

CONSENSUS /  GENERAL CONSENSUS /  DISSENT

*Comments:*  
  
The TWG need to reconvene once again to finish the policy development discussion. They are planning to meet in early September.

*Continued next page*

B. At this TWG meeting, are the TWG members in agreement with the policy direction that CASA is proposing to develop?

YES / NO

CONSENSUS / GENERAL CONSENSUS / DISSENT

*Comments:*

So far, the TWG achieved general consensus in agreeing with the policy direction that CASA is proposing to develop for this set of maintenance regulations. This is noting that the TWG will need to meet again to continue policy discussions in early September.

Some additional comments were raised by the TWG members:

- The TWG believe it is important for the new continuing airworthiness and maintenance regulations to align with the seat breaks within the flight operations regulations.
- During the policy development discussion, the TWG looked at the distinction within FAR Part 135 for maintenance requirements. They recommended for CASA to consider this distinction during a future PIR of this set of regulations

*TWG general comments:*

The TWG acknowledged the need to ensure collaboration between CASA and industry achieves the CAAP 30-4 requirements with proportionate gap analysis which will aid strategies for further collaboration to assist organisations with transition and implementation.

The TWG suggests that the ASAP nominate an additional two TWG members. One member who specialises in aeronautical components appropriate for this sector (e.g. Existing CAR 30 Component workshop), and one member from a CAR30 helicopter maintenance organisation in the small-medium helicopter sector.

#### **CASA Lead Summary**

**Iftekhar Ahmed**

*Comment:*

I thank the TWG members for their contribution to the policy development discussions. We will continue discussions on continuing airworthiness policy when the TWG reconvenes in a few weeks.

#### **APPENDIX**

1. Extract from ASAP Terms of Reference
2. TWG Agenda – 21-23 August 2019
3. Policy discussion points - Continuing airworthiness policy for future air transport operation under Part 121
4. Policy discussion points - Maintenance policy for future air transport operation under Parts 135 and 133

**(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

Reform of continuing airworthiness legislation for the transition of current RPT and charter operations into future air transport operations under Parts 121, 133 and 135 of the CASR

21-23 August 2019

CASA Canberra Office, 16 Furzer Street, Phillip, ACT

# A G E N D A

## Day One – Wednesday, 21 August 2019

Time	Topic	Presenter/s
8.30am – 9.00 am	TWG members arrive at CASA office	TWG members
9.00 am - 9.20 am	START - Welcome, introductions, housekeeping	ASAP
9.20 am – 9.30 am	Review and acknowledge TWG tasking instructions and ASAP terms of reference	ASAP
9.30 am – 10.00 am	An overview of the project	CASA – Ben Challender / Iftekhar Ahmed
10.00 am – 10.20 am	Morning Tea	
10.20 am – 12.00 pm	Maintenance policy for future air transport operation under Parts 135, 133 and 121 – discussion session	All
12.00 pm – 12.45 pm	Lunch Break	
12.45 pm – 2.30 pm	Maintenance policy for future air transport operation under Parts 135, 133 and 121 – discussion session	All
2.30 pm – 2.45 pm	Afternoon tea	
2.45 pm – 4.30 pm	Maintenance policy for future air transport operation under Parts 135, 133 and 121 – discussion session	All
4.30pm – 5.00 pm	Wrap up of day one <ul style="list-style-type: none"><li>• Outstanding issues</li><li>• Policy item summary</li></ul>	CASA – Iftekhar Ahmed

## Day Two – Thursday, 22 August 2019

Time	Topic	Presenter/s
8.00 am – 08.30 am	Arrive, coffee and ready for an 8:30am start	ALL
8.30 am – 10.00 am	Maintenance policy for future air transport operation under Parts 135, 133 and 121 – discussion session	ALL
10.00 am – 10.15 am	Morning Tea	
10.15 am – 12.00 pm	Continuing airworthiness management policy for future air transport operation under Parts 135, 133 and 121 – discussion session	ALL
12.00 pm – 12.45 pm	Lunch Break	
12.45 pm – 2.45 pm	Continuing airworthiness management policy for future air transport operation under Parts 135, 133 and 121 – discussion session	ALL
2.45 pm – 3.00 pm	Afternoon Tea	
3.00 pm – 4.30 pm	Wrap up of day two <ul style="list-style-type: none"> <li>• Outstanding issues</li> <li>• Policy item summary</li> </ul>	CASA – Iftekhar Ahmed

## Day Three – Friday, 23 August 2019

Time	Topic	Presenter/s
8.00 am – 08.30 am	Arrive, coffee and ready for an 8:30am start	ALL
8.30 am – 10.00 am	Continuing airworthiness management policy for future air transport operation under Parts 135, 133 and 121 – discussion session	ALL
10.00 am – 10.15 am	Morning Tea	
10.15 am – 12.00 pm	Continuing airworthiness management policy for future air transport operation under Parts 135, 133 and 121 – discussion session	ALL
12.00 pm – 12.45 pm	Lunch Break	
12.45 pm – 2.00 pm	Continuing airworthiness management policy for future air transport operation under Parts 135, 133 and 121 – discussion session	ALL
2.00 pm – 2.15 pm	Afternoon Tea	
2.15 pm – 2.45 pm	Wrap up of day three <ul style="list-style-type: none"> <li>• Outstanding issues</li> <li>• Policy item summary</li> </ul>	CASA – Iftekhar Ahmed
2.45 pm – 4.00 pm	Wrap up of Technical Working Group <ul style="list-style-type: none"> <li>• Confirm issues</li> <li>• Prepare draft TWG report</li> <li>• Next steps</li> </ul>	ASAP



## Continuing airworthiness policy for future air transport operation under Part 121

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
<p>The TWG in its first meeting reached consensus that:</p> <ul style="list-style-type: none"> <li>Part 42 and 145 will be the continuing airworthiness standard for aircraft engaged in Part 121 operation provided concerns of TWG in relation to following issues in Parts 42 and 145 are addressed.</li> <li>Aircraft to which Subpart 121.Z applies will have to be addressed separately under Part 135.</li> </ul>				
<ul style="list-style-type: none"> <li>Who may carry out maintenance</li> </ul>	<ul style="list-style-type: none"> <li>Maintenance on aircraft and aeronautical products outside Australian territory.</li> </ul> <p><b>Issue:</b> TWG mentioned that CASA should allow maintenance organisations approved by foreign States to carry out maintenance on aircraft outside Australia. This is necessary to support charter operators who flies to various destinations outside Australia where a CASA approved maintenance organisation are not available.</p>	<ul style="list-style-type: none"> <li>Annex 6 Part I - 8.1.2</li> <li>Annex 6 Part III Sec II - 6.1.2</li> <li>Annex 8 Part II - 4.2.3.2</li> <li>Annex 8 Part II - 6.2.6</li> <li>CAA 20AB(2)</li> <li>CASR 42.295</li> <li>CASR 42.305</li> </ul>	<ul style="list-style-type: none"> <li>CASA in principle agrees to allow maintenance organisations approved by following States to carry out maintenance on aircraft outside Australia.                             <ul style="list-style-type: none"> <li>USA</li> <li>EASA member States</li> <li>New Zealand</li> <li>Singapore</li> </ul> </li> <li>Under Part 42, maintenance organisations approved by following States are already able to carry out maintenance on aeronautical products outside Australia.                             <ul style="list-style-type: none"> <li>USA</li> <li>EASA member States</li> <li>New Zealand</li> <li>Singapore</li> <li>Canada</li> </ul> </li> <li>When maintenance on aircraft is carried out by maintenance organisations approved by a foreign State, the registered operator of the aircraft will have to ensure that the organisation releases the aircraft in accordance with CASR Part 42.</li> </ul>	<ul style="list-style-type: none"> <li>The policy will be consulted with wider industry in particular with the existing RPT operators and their maintenance providers who invested significant resources to seek CASA Part 145 approval in foreign States.</li> <li>CASA will consider whether maintenance organisations approved by Canada should be allowed to carry out maintenance on aircraft.</li> <li>Under the ICAO Annex 8 requirement, CASA will be required to have process and procedures for accepting foreign State approved maintenance organisations.</li> </ul>

\* Annex 6 Part I deals with international commercial air transport by aeroplane and Annex 6 Part III Section II deals with international commercial air transport by helicopter. Annex 8 deals with airworthiness of aircraft.

## Continuing airworthiness policy for future air transport operation under Part 121

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
	<ul style="list-style-type: none"> <li>Privilege of pilots to carry out and certify for maintenance.</li> </ul> <p><b>Issue:</b> CASA should extend pilot maintenance privileges to cover additional tasks that are currently carried out by pilots on aircraft used in charter operation. This is necessary as charter aircraft fly to many remote and unscheduled destinations where maintenance providers are not available for essential maintenance. Some of this simple maintenance can be carried out by the pilot of the aircraft.</p>	<ul style="list-style-type: none"> <li>Annex 6 Part I - 8.1.2 b)</li> <li>Annex 6 Part III Sec II - 6.1.2 b)</li> <li>CASR 42.300</li> <li>Part 42 MOS Chapter 15</li> </ul>	<ul style="list-style-type: none"> <li>The existing pilot maintenance privileges will be extended as follows:               <ul style="list-style-type: none"> <li>Maintenance that the instruction for continuing airworthiness specifically allows pilot to carry out.</li> <li>Check aircraft tyre pressure</li> <li>Inspection after a bird strike provided the bird has not been ingested into the aircraft engine or an air inlet or has not impacted any composite structure.</li> <li>Engine compressor water wash using quick release connection.</li> </ul> </li> <li>Current competency and authorisations requirements in Part 42 would apply.</li> </ul>	
<ul style="list-style-type: none"> <li>Continuing airworthiness management</li> </ul>	<ul style="list-style-type: none"> <li>Continuing airworthiness management organisation (CAMO)</li> </ul> <p><b>Issue:</b> CAMO requirements should be scalable, and outcome based which</p>	<ul style="list-style-type: none"> <li>CASR Subpart 42.G</li> <li>Part 42 MOS Chapter 1</li> </ul>	<ul style="list-style-type: none"> <li>Although CAMO requirements are mostly outcome based, CASA will consider making further changes to make these more scalable. CASA will report back to TWG with the proposal for key changes including the following:               <ul style="list-style-type: none"> <li>CASA will formalise a more scalable approach for assessing key personnel,</li> </ul> </li> </ul>	

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## Continuing airworthiness policy for future air transport operation under Part 121

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
	<p>would allow 1 person organisations to be approved as a CAMO.</p> <p>Qualification requirements for CAMO personnel should be less prescriptive and allow multiple pathway including ability to pass an examination to qualify for a position. This is necessary as industry is facing shortage of qualified individuals for CAMO.</p> <p>CASA should remove the need for CAMO management personnel to be approved by CASA.</p>		<p>including a policy for accepting as opposed to approving personnel. All CAMO functions must adequately be covered and responsible key personnel will still have to meet the applicable standards.</p> <ul style="list-style-type: none"> <li>○ CASA will amend the qualification requirements for key personnel to recognise experienced and competent individuals who do not meet formal qualifications requirements.</li> <li>○ All maintenance controllers for charter operators will be grandfathered as the operator's head of CAMO.</li> </ul>	

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
<p>Who may carry out maintenance</p>	<ul style="list-style-type: none"> <li>• Privileges of Maintenance organisations to carry out maintenance.               <ul style="list-style-type: none"> <li>○ Maintenance on aircraft in Australian territory.</li> <li>○ Maintenance on aircraft outside Australian territory.</li> <li>○ Maintenance of aeronautical product inside and outside Australian territory.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Annex 6 Part I - 8.1.2</li> <li>• Annex 6 Part III Sec II - 6.1.2</li> <li>• Annex 8 Part II - 4.2.3.2</li> <li>• Annex 8 Part II - 6.2.6</li> <li>• CAA 20AB(2)</li> <li>• CAR 42ZC</li> <li>• CAR 42ZD</li> </ul>	<ul style="list-style-type: none"> <li>• Maintenance organisations approved under the CASR will be able to carry out maintenance on aircraft inside and outside Australia. This includes Part 145 maintenance organisations and CAR 30 maintenance organisations after transition to CASR (this does not need to be Part 145).</li> <li>• Maintenance organisations approved by following States will be able to carry out maintenance on aircraft outside Australia.               <ul style="list-style-type: none"> <li>○ USA</li> <li>○ EASA member States</li> <li>○ New Zealand</li> <li>○ Singapore</li> </ul> </li> <li>• Maintenance organisations approved by following States will be able to carry out maintenance on aeronautical products outside Australia.               <ul style="list-style-type: none"> <li>○ USA</li> <li>○ EASA member States</li> <li>○ New Zealand</li> <li>○ Singapore</li> <li>○ Canada</li> </ul> </li> <li>• Maintenance organisations will be able to authorise individuals who hold license for an aircraft to carry out and certify for maintenance on another aircraft for a limited period with specific privileges. This is necessary for:</li> </ul>	<ul style="list-style-type: none"> <li>• CASA will consider whether there is need to allow maintenance organisations approved by Canada to carry out maintenance on aircraft.</li> <li>• Under the ICAO Annex 8 requirement, CASA will be required to have process and procedures for accepting foreign State approved maintenance organisations.</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
		<ul style="list-style-type: none"> <li>○ introduction of new aircraft</li> <li>○ legacy aircraft for which training may not be available</li> <li>● Maintenance organisations will be able to assess and authorise individuals to carry out and certify for NDT and welding without the need for the individual to hold CASA authorisation provided the organisation has established competency of the individual.</li> <li>● Maintenance organisations will be able to authorise a Part 66 licence holder to carry out and certify maintenance on an aircraft that a pilot licence holder is able to carry out if the Part 66 licence holder's existing privilege does not cover the maintenance. The organisation will be required to establish competency of the Part 66 licence holder.</li> <li>● When maintenance on aircraft is carried out by maintenance organisations approved by a foreign State, the registered operator of the aircraft will have to ensure that the organisation releases the aircraft in accordance with the applicable Australian legislation.</li> </ul>	
	<ul style="list-style-type: none"> <li>● Privilege of independent Part 66 licence holders to carry out and certify for maintenance on aircraft.</li> </ul>	<ul style="list-style-type: none"> <li>● Annex 6 Part I - 8.1.2 b)</li> <li>● Annex 6 Part III Sec II - 6.1.2 b)</li> <li>● CAR 42ZC(4)</li> </ul>	<ul style="list-style-type: none"> <li>● Current concept of listing excluded maintenance to describe privileges will continue.</li> <li>● TWG was reminded by CASA that extending the independent maintainer's privileges for all aircraft</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
	<ul style="list-style-type: none"> <li>CAR Schedule 7</li> </ul>	<ul style="list-style-type: none"> <li>TWG reviewed the existing exclusion list in Schedule 7 and proposed amendments. However, there are issues in relation to certain items in the list that would need further investigation by CASA. See separate Schedule 7 and 8 document for list of proposed exclusions and issues that will need further investigation.</li> <li>There may be a need to differentiate between aeroplane and rotorcraft.</li> <li>The text in the existing schedule will be updated and refined without changing the agreed intent. Where possible exclusions will be described using broad based principles linked with safety outcome. For example, no major modification and repair.</li> <li>A Part 66 licence holder will be able to carry out any pilot maintenance task on an aircraft for which the licence is rated. Certain maintenance tasks on large complex aircraft may require training.</li> </ul>	<p>within Parts 133 and 135 would mean privileges beyond existing class B aircraft which would include:</p> <ul style="list-style-type: none"> <li>large complex aeroplanes up to 8618 kg MTOW</li> <li>large complex rotorcrafts up to any size and capacity.</li> </ul> <ul style="list-style-type: none"> <li>CASA pointed out that USA and NZ restrict the independent licence holders' privileges to aeroplane and rotorcraft with 'maximum certificated passenger seating capacity' of up to 9 seats. NZ also applies MTOW restriction of up to 5700 kg.</li> </ul>
	<ul style="list-style-type: none"> <li>Privilege of independent NDT and welding authority holders to carry out and certify for maintenance on aircraft.</li> </ul>	<ul style="list-style-type: none"> <li>Maintenance/airworthiness authorities would remain available for NDT and welding, but not general maintenance.</li> <li>Independent NDT authority holders will be able to carry out and certify for welding.</li> </ul>	

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
		<ul style="list-style-type: none"> <li>Independent welding authority holders will be able to carry out and certify for welding.</li> <li>It is anticipated that independent NDT and welding authority holders will be able to go into a maintenance organisation to carry out the NDT and welding under the supervision of the maintenance organisation. The supervision in this case would be for the facilitation of the work (such as providing access etc.) and not the supervision of the NDT and welding. The authority holder will remain responsible for the performance of the NDT and welding. In case of NDT, the authority holder will be required to record the finding of the NDT.</li> </ul>		
	<ul style="list-style-type: none"> <li>Privilege of pilots to carry out and certify for maintenance.               <ul style="list-style-type: none"> <li>Training and authorisation requirements.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Annex 6 Part I - 8.1.2 b)</li> <li>Annex 6 Part III Sec II - 6.1.2 b)</li> <li>CAR 42ZC(4)</li> <li>CAR Schedule 8</li> </ul>	<ul style="list-style-type: none"> <li>The current concept of listing maintenance to describe privileges will continue.</li> <li>TWG reviewed the existing privileges in Schedule 8 of the CAR and proposed amendments. However, there are issues in relation to certain items in the list that would need further investigation by CASA. See separate Schedule 7 and 8 document for list of proposed privileges and issues that will need further investigation.</li> </ul>	<ul style="list-style-type: none"> <li>TWG was reminded by CASA that extending the pilots maintenance privilege for all aircraft within Parts 133 and 135 would mean privileges beyond existing class B aircraft which would include:               <ul style="list-style-type: none"> <li>large complex aeroplanes up to 8618 kg MTOW.</li> <li>large complex rotorcrafts up to any size and capacity.</li> </ul> </li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
		<ul style="list-style-type: none"> <li>Pilot maintenance privilege will not be covered by aircraft's system of maintenance (maintenance program in future).</li> <li>Pilots will have to be trained by a maintenance organisation or a maintenance training organisation and be authorised by the operators based on their competency.</li> <li>There may be a need to differentiate between aeroplane and rotorcraft.</li> <li>The text in the existing schedule will updated and refined without changing the agreed intent. Where possible privileges will be described using broad based principles linked with safety outcome. For example, replacement of cabin equipment and furnishing without using tool or using hand tools only.</li> </ul>	<ul style="list-style-type: none"> <li>CASA pointed out that USA permits very limited pilot maintenance privilege for aeroplane which is only available for aeroplanes with maximum certificated passenger seating capacity of up to 9 seats. Also, the NZ pilot maintenance privilege for aircraft operated under Part 135 is quite limited.</li> </ul>
<ul style="list-style-type: none"> <li>Maintenance organisation requirements.</li> </ul>	<ul style="list-style-type: none"> <li>General</li> <li>Scope of approval</li> </ul>	<ul style="list-style-type: none"> <li>Annex 8 Part II Chapter 6</li> <li>CAR 30</li> <li>CAAP 30-4</li> <li>CAR 30(2)(a)(i)</li> <li>CAAP 30-4 Para 4.1.5</li> <li>Annex 6 Part II - 6.2.3 f)</li> <li>Annex 6 Part II - 6.2.3.1</li> </ul>	<p>The requirements for the issue of a maintenance organisation approval and the continuation of it will be based on CAAP 30-4 and associated CARs. CASA will develop a comprehensive policy document for the maintenance organisations' requirement based on the CAAP and what has been agreed below and this will be consulted with TWG.</p> <ul style="list-style-type: none"> <li>Maintenance organisation will be able to apply for 'aircraft maintenance' scope for a of class of aircraft incorporating all non-type rated aircraft.</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
			<ul style="list-style-type: none"> <li>○ Applicant should demonstrate capability for carrying out maintenance on the class of aircraft including availability of required tools and equipment and ability to access the applicable maintenance data.</li> <li>○ There may be need for additional procedure in the manual to cater for maintenance on a wide range of aircraft. For example, it may be necessary to have procedures for determining equivalency of tools and equipment that are used on a wide range of aircraft.</li> <li>● The difference between aircraft and component maintenance will exist.</li> <li>● Any maintenance that is carried out on a component removed from an aircraft and that is installed back to the same aircraft will be considered aircraft maintenance provided:               <ul style="list-style-type: none"> <li>○ maintenance does not require use of special tools, equipment and dedicated workshop facilities;</li> <li>○ the component does not require bench test and serviceability can be tested on the aircraft in accordance with applicable maintenance data;</li> <li>○ the licence holder who certifies the maintenance is competent to carry out the maintenance as part of his/her usual</li> </ul> </li> </ul>	

\* Annex 6 Part I deals with international commercial air transport by aeroplane and Annex 6 Part III Section II deals with international commercial air transport by helicopter. Annex 8 deals with airworthiness of aircraft.

## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
		<p>competency requirements for the licence privilege.</p> <ul style="list-style-type: none"> <li>If an aircraft maintenance organisation has the capability to carry out certain level of component maintenance, then the organisation should seek approval for the relevant component maintenance ratings.</li> </ul>	
	<ul style="list-style-type: none"> <li>Continued validity of the approval certificate</li> </ul>	<ul style="list-style-type: none"> <li>CAR 32</li> <li>CAAP 30-4, Sec 5</li> <li>Annex 6 Part II - 6.2.3 e)</li> </ul>	<ul style="list-style-type: none"> <li>CASA may consider putting expiry date on the certificate specially at the initial issue which may subsequently become perpetual.</li> </ul>
	<ul style="list-style-type: none"> <li>Maintenance organisation's manual</li> </ul>	<ul style="list-style-type: none"> <li>CAR 30(2)(b)(iv)</li> <li>CAR 30(2)(c)</li> <li>CAR 30(2D)(a)</li> <li>CAAP 30-4, App 5</li> <li>Annex 8 Part II - 6.3</li> <li>Annex 8 Part II - 6.4</li> </ul>	<ul style="list-style-type: none"> <li>Maintenance organisations will be required to have a manual that sets out how the organisation conducts its activities and complies with the requirements of the legislation. In addition, the manual should include: <ul style="list-style-type: none"> <li>the organisation's structure;</li> <li>the roles and responsibilities of management personnel and other key personnel;</li> <li>primary location and any other approved location;</li> <li>scope of approval;</li> <li>general description of the facilities at each location.</li> </ul> </li> <li>The complexity of the procedure manual will depend on the organisation's size, the scope and the complexity of its activity.</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
		<ul style="list-style-type: none"> <li>• The quality system may be included in the manual or may be in a separate document. The quality system will mostly be comprised of compliance monitoring.</li> <li>• SMS procedures will mostly be integrated with other procedures, but the manual should describe how it is implemented.</li> </ul>		
	<ul style="list-style-type: none"> <li>• Management personnel and responsibilities</li> </ul>	<ul style="list-style-type: none"> <li>• CAR 30(2C)(c)</li> <li>• CAR 30(2D)(c)</li> <li>• CAR 30(2D)(d)</li> <li>• CAAP 30-4, Para 4.1.5</li> <li>• CAAP 30-4 App 2, Sec 2</li> <li>• Annex 6 Part II - 6.6.1</li> <li>• Annex 6 Part II - 6.6.2</li> </ul> <p>Following references in relation to qualification of the applicant:</p> <ul style="list-style-type: none"> <li>• CAR 30(2)(b)(i)</li> <li>• CAR 30(2B)(a)</li> <li>• CAR 30(4)(d)(i)</li> </ul>	<ul style="list-style-type: none"> <li>• Maintenance organisations will be required to have following management personnel: <ul style="list-style-type: none"> <li>○ An accountable person with ultimate authority.</li> <li>○ One or more person responsible for controlling the activities of the organisation.</li> <li>○ A person responsible for safety and quality system.</li> </ul> </li> <li>• It will be possible to have a single person filling all of the above positions (depending on the size and complexity of the organisation) except the individuals performing internal audit will have to be independent of the activity.</li> </ul>	<ul style="list-style-type: none"> <li>• Some members of TWG expressed concern about CASA interviewing management personnel.</li> <li>• CASA informed TWG that requirement to interview individuals is mostly dictated by CASA's procedure. CASA will formalise a more scalable approach for assessing key personnel, including a policy for accepting as opposed to approving personnel. All AMO functions must be adequately covered and responsible key personnel will still have to meet the applicable standards</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
	<ul style="list-style-type: none"> <li>• Locations where maintenance may be carried out</li> </ul>	<ul style="list-style-type: none"> <li>• CAR 30(2C)(a)</li> <li>• CAR 30(2D)(b)</li> <li>• CAAP 30-4, Para 4.1.5</li> <li>• CAAP 30-4, Para 7.1.1</li> <li>• Annex 6 Part II - 6.2.3 g)</li> </ul>	<ul style="list-style-type: none"> <li>• Maintenance organisations will be able to carry out unscheduled maintenance at locations not covered by the existing approval, supported by control and assessment procedure in the manual.</li> <li>• Maintenance organisations will be able to carry out scheduled maintenance at locations not covered by the existing approval, supported by control and assessment procedure in the manual.               <ul style="list-style-type: none"> <li>○ Possible probationary requirement for the procedure to include prior notification to CASA or consent of CASA.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• CASA may limit schedule maintenance at locations not covered by the existing approval in terms complexity and frequency of the maintenance.</li> <li>• CASA will consult with TWG regarding any limitations.</li> </ul>
	<ul style="list-style-type: none"> <li>• Changes to the approval</li> </ul>	<ul style="list-style-type: none"> <li>• CAR 30A</li> <li>• Annex 8 Part II - 6.2.5</li> </ul>	<ul style="list-style-type: none"> <li>• Following changes will require approval of CASA:               <ul style="list-style-type: none"> <li>○ Change of scope of maintenance – noting broad categories of scope may be specified.</li> <li>○ Change to management personnel – noting commitment to formalise scalable assessment procedures.</li> <li>○ Change to primary location.</li> </ul> </li> <li>• For component maintenance, defining the scope of maintenance using part number should be avoided if possible. This will allow organisations to maintain similar components without the need to seek change of scope.</li> </ul>	

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
	<ul style="list-style-type: none"> <li>Premises and facilities</li> </ul>	<ul style="list-style-type: none"> <li>CAR 30(2)(b)(ii)</li> <li>CAR 30(2B)(b)</li> <li>CAR 30(2C)(a)</li> <li>CAAP 30-4, Para 4.1.5</li> <li>CAAP 30-4, Para 4.1.9</li> <li>CAAP 30-4 App 1</li> <li>Annex 8 Part II - 6.5.1</li> <li>Annex 8 Part II - 6.5.3</li> </ul>	<ul style="list-style-type: none"> <li>Need for premises and facilities as per existing requirement in the regulation and CAAP 30-4.</li> </ul>	
	<ul style="list-style-type: none"> <li>Personnel requirements other than management personnel.</li> </ul>	<ul style="list-style-type: none"> <li>CAR 30(2)(a)(iii)</li> <li>CAR 30(2)(b)(i)</li> <li>CAR 30(2B)(a)</li> <li>CAR 30(4)(d)(i)</li> <li>CAAP 30-4, Para 4.1.5</li> <li>CAAP 30-4, Para 4.1.9</li> <li>CAAP 30-4 App 2</li> <li>Annex 6 Part II - 6.6.3</li> <li>Annex 6 Part II - 6.6.4</li> </ul>	<ul style="list-style-type: none"> <li>Organisation will be required to have appropriately qualified maintenance personnel to carry out maintenance under the scope of approval.</li> <li>Organisation will be required to authorise certification personnel. As minimum, this will require listing certification personnel in a register and making the personnel aware of their scope of authorisation.</li> <li>The personnel conducting audits will have to be competent in audit.</li> </ul>	<ul style="list-style-type: none"> <li>CASA noted TWG member Sheridan Austin's concern that carrying out audit requires specific skills and as such there should be formal training and qualification requirements for the quality personnel.</li> </ul>
	<ul style="list-style-type: none"> <li>Training of personnel</li> </ul>	<ul style="list-style-type: none"> <li>CAR 30(2C)(d)</li> <li>CAAP 30-4 Para 4.1.9</li> <li>CAAP 30-4 App 2</li> <li>Annex 6 Part II - 6.6.5</li> </ul>	<ul style="list-style-type: none"> <li>Personnel will have to be trained on organisations process and procedure.</li> <li>Role specific training will have to be provided for non-technical personnel.</li> <li>Human factor training will have to be provided to maintenance personnel including recurrence</li> </ul>	<ul style="list-style-type: none"> <li>CASA will consider providing online human factor training.</li> <li>TWG member Sheridan Austin expressed support for hard time recurrence human factor training.</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
		<p>training at required interval decided by the organisation.</p> <ul style="list-style-type: none"> <li>• If required, appropriate technical training will have to be provided to ensure that personnel are competent to carry out the maintenance. <ul style="list-style-type: none"> <li>○ Training on unfamiliar aircraft or aircraft systems</li> <li>○ Training on equipment</li> <li>○ Training on aircraft ground handling</li> </ul> </li> <li>• Organisations will be required to keep record of training provided.</li> </ul>	
<ul style="list-style-type: none"> <li>• Tools and equipment</li> </ul>	<ul style="list-style-type: none"> <li>• CAR 30(2)(b)(ii)</li> <li>• CAR 30(2B)(b)</li> <li>• CAR 30(2C)(a)</li> <li>• CAR 30(2D)(a)(ii)</li> <li>• CAAP 30-4, Para 4.1.5</li> <li>• CAAP 30-4 App 3</li> <li>• Annex 8 Part II - 6.5.2</li> </ul>	<ul style="list-style-type: none"> <li>• The need for tools and equipment will be as per existing requirement in the regulation and CAAP 30-4.</li> <li>• Organisation will be able to use alternate tools and equipment provided there are procedures for this.</li> </ul>	
<ul style="list-style-type: none"> <li>• Airworthiness data</li> </ul>	<ul style="list-style-type: none"> <li>• CAAP 30-4 Appendix 4</li> <li>• Annex 8 Part II - 6.5.2</li> </ul>	<ul style="list-style-type: none"> <li>• Organisation will be required to have access to applicable maintenance data.</li> </ul>	
<ul style="list-style-type: none"> <li>• Contracting</li> </ul>	<ul style="list-style-type: none"> <li>• CAAP 30-4 App 6</li> </ul>	<ul style="list-style-type: none"> <li>• Organisation will be required to have process and procedures for contracting and sub-contracting.</li> <li>• Contracting means entering into an arrangement with a certificate or licence holder</li> </ul>	

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
		<p>for the performance, certification of maintenance and issue of release by the holder.</p> <ul style="list-style-type: none"> <li>○ The organisation will have to ensure the contracted certificate, or licence holder's scope, cover the scope of work and facilitate their work.</li> <li>• Sub-contracting means entering into an arrangement with a person who does not hold a certificate or licence for the performance, certification of maintenance and issue of release after maintenance.               <ul style="list-style-type: none"> <li>○ The subcontracted person performs maintenance under the certificated organisation's approval and under the organisation's process and procedures.</li> </ul> </li> </ul>	
	<ul style="list-style-type: none"> <li>• Records and work package</li> </ul>	<ul style="list-style-type: none"> <li>• CAAP 30-4 App 5 Sec 7</li> <li>• CAAP 30-4 App 7</li> <li>• Annex 6 Part II - 6.7</li> </ul>	<ul style="list-style-type: none"> <li>• Record and work package requirement will apply as per CAAP 30-4 App 5 Sec 7.</li> <li>• There will be overarching requirement to ensure records are kept in a form and format that ensures readability, security and integrity of the records at all times.</li> <li>• Electronic record will be acceptable.</li> </ul>
	<ul style="list-style-type: none"> <li>• Non-destructive testing</li> </ul>	<ul style="list-style-type: none"> <li>• CAAP 30-4 App 8</li> </ul>	<ul style="list-style-type: none"> <li>• Organisation will be able to carry out NDT employing competent person not necessarily holding CASA authorisation.</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
	<ul style="list-style-type: none"> <li>• Manufacture of parts during maintenance</li> </ul>	<ul style="list-style-type: none"> <li>• CAAP 30-4 App 9</li> </ul>	<ul style="list-style-type: none"> <li>• Organisations will be able to seek privilege to fabricate parts in course of maintenance subject to limitation and condition in accordance with CAAP 30-4 App 9.</li> <li>• Scope of fabrication privileges will be determined according to the organisation's capability (does not have to be limited to Class III products or particular parts) and will have to be defined in the manual/approval.</li> </ul>
	<ul style="list-style-type: none"> <li>• Consideration of human factor in maintenance</li> </ul>	<ul style="list-style-type: none"> <li>• Annex 6 Part II - 6.4</li> </ul>	<ul style="list-style-type: none"> <li>• Maintenance performance rule should integrate human factor and human performance issues. In this context, need to independently verify critical controls system maintenance provides protection against maintenance error.</li> <li>• Adequate facility with proper lighting and environment etc. is conducive to optimum human performance and is already part of the existing requirement for maintenance organisations.</li> <li>• There will be a requirement to ensure tools and extraneous items have been removed from aircraft or aeronautical products after maintenance.</li> <li>• A systemic approach for controlling and documenting work in progress using work sheets and work cards as set out in the CAAP</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
	<ul style="list-style-type: none"> <li>Safety management system (SMS)</li> </ul>	Annex 19	<p>30-4 App 5 Sec 7 contributes to good maintenance practice and safer outcome.</p> <ul style="list-style-type: none"> <li>Appropriate and relevant elements of SMS based on the size and complexity of organisations.</li> <li>Integration with common elements of another system such as quality system will be acceptable.</li> </ul>	
<ul style="list-style-type: none"> <li>Maintenance performance rules</li> </ul>	<ul style="list-style-type: none"> <li>Need for competency to carry out maintenance.</li> </ul>	<ul style="list-style-type: none"> <li>Annex 8 Part II - 6.3.1 e)</li> <li>Annex 8 Part II - 6.6.4</li> <li>CAR 30(2B)(a)</li> <li>CAR 30(2C)(d)</li> <li>CAR 30(4)(d)(i)</li> </ul>	<ul style="list-style-type: none"> <li>Maintenance will have to be carried out by individuals who are competent or under the supervision of individuals who are competent.</li> </ul>	
	<ul style="list-style-type: none"> <li>Use of appropriate facilities, current maintenance data, tools and equipment.</li> </ul>	<ul style="list-style-type: none"> <li>Annex 8 Part II - 6.5</li> <li>CAR 42V</li> <li>CAR 30(2B)(b)</li> <li>CAR 30(2C)(a)</li> <li>CAR 30(4)(d)(ii)</li> </ul>	<ul style="list-style-type: none"> <li>Maintenance will have to be carried out: <ul style="list-style-type: none"> <li>in accordance with applicable maintenance data for the maintenance;</li> <li>using facilities that are appropriate for carrying out the maintenance;</li> <li>using tools, equipment or materials are mentioned in the maintenance data for the maintenance;</li> <li>using measuring or testing equipment with a level of accuracy that is essential for proper completion of the maintenance to standard required by the maintenance data.</li> </ul> </li> </ul>	

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
		<ul style="list-style-type: none"> <li>Maintenance organisations will be able use substitute tools and equipment in accordance with procedures in their manual.</li> </ul>	
	<ul style="list-style-type: none"> <li>Requirement for modification to be carried out in accordance with approved design data.</li> </ul>	<ul style="list-style-type: none"> <li>All modification will have to be carried out in accordance design data approved or accepted under Part 21. This is to ensure compliance with applicable airworthiness standards.</li> </ul>	
	<ul style="list-style-type: none"> <li>Independent inspection.               <ul style="list-style-type: none"> <li>Circumstances under which independent inspection is needed.</li> <li>Who may carry out independent inspection?</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The TWG agreed to adopt the concept of independent verification of ‘critical control system maintenance’ which is more outcome based than the existing requirement of independent inspection in regulation 42G of the CAR.</li> <li><b>critical control system maintenance</b> means maintenance carried out on the aircraft control system that, if not carried out correctly, may result in a failure, malfunction or defect of the system that will endanger the safe operation of the aircraft.</li> <li><b>aircraft control system means</b> the system of the aircraft by which the flight path, attitude or propulsive force of the aircraft is changed.</li> </ul>	

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
			<ul style="list-style-type: none"> <li>• Following individuals will be able to carry out verification of critical control system maintenance on an aircraft.               <ul style="list-style-type: none"> <li>○ An appropriately rated Part 66 licence holder for the aircraft.</li> <li>○ A Part 66 licence holder who is licensed to certify for the critical control system maintenance on an aircraft having control system of similar technology and construction.</li> <li>○ A cross category Part 66 licence holder on the aircraft. The part 66 licence holder may require training on critical control system maintenance on large complex aircraft.</li> <li>○ A pilot licence holder for the aircraft on which the maintenance has been carried out provided the pilot been trained by a maintenance organisation and has been authorised by the operator based on their competency.</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>• Dealing with defect</li> </ul>	<ul style="list-style-type: none"> <li>• Requirement for defect to be recorded by maintenance personnel.</li> <li>• Deferring a defect               <ul style="list-style-type: none"> <li>○ What kinds of defect may be deferred?</li> <li>○ Who may defer a defect?</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• CAR 47(1)</li> <li>• CAR 49</li> <li>• CAR 50</li> </ul>	<ul style="list-style-type: none"> <li>• All defects discovered during maintenance will have to be recorded.</li> <li>• A defect in an aircraft will have to be rectified before a flight unless operation of the aircraft with the defect is permitted by one or more of the following:               <ul style="list-style-type: none"> <li>○ The instructions for continuing airworthiness for the aircraft;</li> </ul> </li> </ul>	

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
	<ul style="list-style-type: none"> <li>○ Procedure for deferring defect.</li> </ul>		<ul style="list-style-type: none"> <li>○ The minimum equipment list for the aircraft;</li> <li>○ The flight manual for the aircraft which may also include a configuration deviation list;</li> <li>○ A special flight permit for the flight;</li> <li>○ An airworthiness directive;</li> <li>○ An approval under regulation 21.007 which deals with permissible unserviceability;</li> <li>○ Any other provision of the legislation.</li> <li>● An aircraft may operate for a light with a defect if the defect is in an equipment or a system of the aircraft that is not required: <ul style="list-style-type: none"> <li>○ by the certification basis for the aircraft;</li> <li>and</li> <li>○ under the regulations for the flight.</li> </ul> </li> <li>● An aircraft may operate with a superficial defect or defects that affects the cosmetics/appearance of an item and does not affect the function, integrity and soundness of the item. Such defect does not have to be recorded. Examples are dirty cabin seats, eroded paint etc.</li> <li>● For accountability, all defects in an aircraft will have to be deferred in writing either by an appropriately licensed maintenance personnel or where permitted by the pilot in command for the flight.</li> </ul>	

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
		<ul style="list-style-type: none"> <li>• The record of deferral will have to contain:               <ul style="list-style-type: none"> <li>○ a description of the defect;</li> <li>○ a statement of the reasons for the decision to defer the rectification of the defect;</li> <li>○ any limitations or conditions mentioned the data or document that is used as the basis for deferring the defect.</li> </ul> </li> <li>• Certain types of deferral will have to be recorded in the flight technical log or equivalent document in particular those:               <ul style="list-style-type: none"> <li>○ covered by MEL or CDL; or</li> <li>○ affecting the operation of the aircraft.</li> </ul> </li> </ul>	
	<ul style="list-style-type: none"> <li>• Major defect reporting.</li> </ul>	<ul style="list-style-type: none"> <li>• Annex 8 Part II - 4.2.3.1 f)</li> <li>• Annex 8 Part II – 4.2.4</li> <li>• Annex 8 Part II – 6.3.1 k)</li> <li>• CAR 51(1) and (2)</li> <li>• CAR 51A</li> </ul>	<ul style="list-style-type: none"> <li>• Maintenance organisations and independent maintainers carrying maintenance on aircraft will have to report any major defect in an aircraft to the registered operator of the aircraft.</li> <li>• Maintenance organisation carrying out maintenance on an aeronautical product will have to report any major defect in the aeronautical product to CASA</li> </ul>
<ul style="list-style-type: none"> <li>• Maintenance record</li> </ul>	<ul style="list-style-type: none"> <li>• Need for creating maintenance record.               <ul style="list-style-type: none"> <li>○ Information to be recorded.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Annex 8 Part II – 6.3.1 f)</li> <li>• Annex 8 Part II – 6.7</li> <li>• CAR 42ZE</li> <li>• CAR 42ZN</li> <li>• CAR 50C</li> </ul>	<ul style="list-style-type: none"> <li>• A maintenance organisation will have to ensure maintenance records are created for all maintenance carried out by the organisation on an aircraft or aeronautical product.</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
	<ul style="list-style-type: none"> <li>• Retention of maintenance record by maintenance providers.</li> <li>• Providing registered operator copies of maintenance records.</li> </ul>	<ul style="list-style-type: none"> <li>• CAR Schedule 6</li> <li>• CAO 100.5 - 5A</li> </ul>	<ul style="list-style-type: none"> <li>• An independent maintainer will have to create maintenance records for all maintenance carried out by him/her on an aircraft.</li> <li>• For maintenance carried out on an aircraft, following information will have to be recorded in the aircraft's maintenance records:               <ul style="list-style-type: none"> <li>○ The registration mark for the aircraft.</li> <li>○ The date on which the maintenance was completed.</li> <li>○ A description of the maintenance.</li> <li>○ Reference to the maintenance data used.</li> <li>○ If applicable information identifying the design of any modification or repair.</li> <li>○ A description of any part fitted including the part number and the serial number of the part.</li> <li>○ If applicable reference to authorised release certificate or an equivalent document.</li> <li>○ If applicable information identifying the aircraft from which the part was removed.</li> <li>○ If applicable a statement that the part has been fabricated during maintenance.</li> </ul> </li> <li>• For maintenance carried out on an aeronautical product, following information will have to be recorded in the product's maintenance records:               <ul style="list-style-type: none"> <li>○ Information that identifies the aeronautical product including the part number and serial number of the product.</li> </ul> </li> </ul>	

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
			<ul style="list-style-type: none"> <li>○ The date on which the maintenance was completed.</li> <li>○ A description of the maintenance.</li> <li>○ Information identifying the maintenance data for the maintenance.</li> <li>○ If applicable information identifying the design of any modification or repair.</li> <li>○ Description of any part fitted including the part number and the serial number of the part.</li> <li>○ If applicable reference to authorised release certificate or equivalent document.</li> <li>● Retention period for maintenance records will be 2 years beginning on the date when the organisation issued the certificate of release to service for the aircraft or aeronautical product for the maintenance.</li> <li>● Maintenance organisations and independent maintainers will have to provide registered operator copies of maintenance records for any maintenance carried out on the operator's aircraft.</li> </ul>	
<ul style="list-style-type: none"> <li>● Use of parts and materials in maintenance</li> </ul>	<ul style="list-style-type: none"> <li>● Eligibility for fitment to an aircraft or another aeronautical product – design aspect.</li> </ul>	<ul style="list-style-type: none"> <li>● CAR 42W</li> <li>● CAR42WA</li> <li>● AWB 02-057 Issue 1</li> </ul>	<ul style="list-style-type: none"> <li>● Fitment of a part to an aircraft or an aeronautical product will be allowed in a location in an aircraft or in an aeronautical product only if the approved design for the aircraft or the aeronautical product allows fitment of the part in that location.</li> </ul>	

\* Annex 6 Part I deals with international commercial air transport by aeroplane and Annex 6 Part III Section II deals with international commercial air transport by helicopter. Annex 8 deals with airworthiness of aircraft.

## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
<ul style="list-style-type: none"> <li>• Need to establish traceability and authenticity of aeronautical products.               <ul style="list-style-type: none"> <li>○ Parts other than standards parts.</li> <li>○ Standard parts.</li> <li>○ Materials.</li> </ul> </li> <li>• Acceptance of parts released under the approval of foreign authorities.</li> <li>• Use of salvaged parts from registered and unregistered aircraft.</li> <li>• Fabrication of part in course of maintenance.               <ul style="list-style-type: none"> <li>○ Limitations.</li> </ul> </li> <li>• Control of unserviceable, unsalvageable and unapproved parts.</li> </ul>		<ul style="list-style-type: none"> <li>• Person fitting the part will have to have following documents to establish traceability and authenticity of the part:               <ul style="list-style-type: none"> <li>○ Authorised release certificate for parts other than standards parts.</li> <li>○ Certificate of conformity with applicable standard or specification for standard parts or materials.</li> </ul> </li> <li>• For a part released under the approval of foreign authorities - an authorised release certificate issued under the law of the foreign country will be required.</li> <li>• Use of salvaged parts from registered and unregistered aircraft will be allowed in accordance guidance in the AWB 02-057.</li> <li>• Fabrication of part in course of maintenance will be allowed in accordance with limitations in the legislation.</li> <li>• Unserviceable and unsalvageable parts will have to be tagged and kept separated from the other parts and will have to be mutilated or destroyed before disposing of.</li> <li>• Unapproved parts will have to be reported to:               <ul style="list-style-type: none"> <li>○ CASA; and</li> </ul> </li> </ul>	

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement	
			<ul style="list-style-type: none"> <li>○ if applicable, the registered operator of the aircraft on which part was found.</li> <li>● Unapproved parts will have to be tagged and kept separated from other parts and will have to be disposed of in a manner required by CASA.</li> </ul>	
<ul style="list-style-type: none"> <li>● Certification of maintenance</li> </ul>	<ul style="list-style-type: none"> <li>● Certification for proper completion of maintenance on aircraft               <ul style="list-style-type: none"> <li>○ Who may perform the certification?</li> <li>○ Form and content of the certification.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>● CAR 42ZE</li> <li>● CAR 42ZN</li> <li>● CAR Schedule 6</li> </ul>	<ul style="list-style-type: none"> <li>● Certification of completion of maintenance (<i>maintenance certification</i>) will be required for each maintenance task carried out by maintenance organisations or by independent maintainers including pilots.</li> <li>● Certification will have to be carried out by following individuals who carried out or supervised carrying out of the maintenance:               <ul style="list-style-type: none"> <li>○ Aircraft maintenance licence holders or individual otherwise authorised.</li> </ul> </li> <li>● Certification will have to be done on the maintenance record which will include the details if maintenance carried out.</li> </ul>	
<ul style="list-style-type: none"> <li>● Maintenance release</li> </ul>	<ul style="list-style-type: none"> <li>● Issue of maintenance release/release to service for aircraft.               <ul style="list-style-type: none"> <li>○ Who may perform release?</li> <li>○ Form and content of release.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>● Annex 8 Part II - 6.8</li> <li>● CAR 43</li> </ul>	<ul style="list-style-type: none"> <li>● After the completion of all maintenance on an aircraft, the maintenance organisation or independent maintainer will have to issue a certificate stating that that all maintenance has been carried out in accordance with the requirements of the applicable legislation.</li> </ul>	<ul style="list-style-type: none"> <li>● Considering the need to issue CRS after any maintenance, few members of the TWG mentioned that the issuing of CRS should be simple and not onerous as CRS.</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
		<ul style="list-style-type: none"> <li>• The certificate will be called certificate of release to service (CRS) which will be comparable with final certification under the CAR.</li> <li>• Part 66 license holder will be able to issue the CRS.</li> <li>• Following information will have to be included in the CRS:               <ul style="list-style-type: none"> <li>○ Aircraft registration number.</li> <li>○ Identification of the maintenance to which the CRS relates – for example by work package number etc.</li> <li>○ Signature and licence/authorisation number of the individual issuing the CRS</li> <li>○ If applicable identity of the maintenance organisation</li> <li>○ If maintenance is carried out by independent maintainer the name of the independent maintainer</li> <li>○ The date of issue.</li> </ul> </li> <li>• The individual issuing CRS will have to ensure:               <ul style="list-style-type: none"> <li>○ maintenance certification has been issued for all maintenance tasks carried out;</li> <li>○ if applicable verification of critical control system maintenance has been carried out;</li> <li>○ the certificate includes details of any open defect that has not been deferred or any</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• CASA will consider issuing form/template for flight technical log similar current maintenance release which can be used to record maintenance and issue CRS</li> </ul>

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## Maintenance policy for future air transport operation under Parts 135 and 133

Key policies to be discussed	Relevant references*	Agreed policies	Comments including points of disagreement
			<p>required maintenance that has not been carried out;</p> <ul style="list-style-type: none"> <li>○ the registered operator has been informed of the open defect and the outstanding maintenance.</li> </ul>
	<ul style="list-style-type: none"> <li>● Issue of maintenance release/release to service for aeronautical products.               <ul style="list-style-type: none"> <li>a. Who may perform release and how it must be done?</li> <li>b. Internal release for parts maintained and fitted to aircraft by the same maintenance organisation.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>● Annex 8 Part II - 6.8</li> <li>● 42WA</li> </ul>	<ul style="list-style-type: none"> <li>● Release to service for aeronautical products will have to be issued in the form of authorised release certificate on CASA Form 1 by maintenance organisations that carry maintenance on aeronautical products.</li> <li>● The certificate will have to be issued on behalf of the maintenance organisation by an individual authorised by the organisation.</li> <li>● Internal release such as serviceable tags will be acceptable for parts maintained and fitted to aircraft by the same maintenance organisation.</li> </ul>

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