



CONTINUING AIRWORTHINESS AND MAINTENANCE REGULATIONS FOR FUTURE AIR TRANSPORT  
OPERATIONS - ASAP TECHNICAL WORKING GROUP  
TASKING INSTRUCTIONS AND **FOURTH** TWG MEETING REPORT

10 NOVEMBER 2020

*The Technical Working Group is established to operate and report to the Aviation Safety Advisory Panel (ASAP) in accordance with the Terms of Reference of the 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.

#### TWG MEETINGS

The first TWG meeting was held on 21 – 23 August 2019 in Canberra.

The second TWG meeting was held on 10 – 11 September in Canberra to continue policy development discussions.

The third TWG meeting was held on 24 October to review the final proposed policies prior to public consultation.

A number of further meetings were held by videoconference in light of the COVID related travel restrictions. This report relates to these meetings held on:

- a. 15 September 2020
- b. 17 September 2020
- c. 22 September 2020
- d. 24 September 2020
- e. 10 November 2020

**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**

Members of the TWG have been appointed by the ASAP Chair, following ASAP processes.

The TWG consists of the following members:

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

The TWG CASA Lead is Mr Iftekhar Ahmed and was supported by CASA subject matter experts.

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.

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 – 10 November 2020

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.

After the TWG provides advice to the ASAP on the proposed policies, the TWG will then assist CASA with the next phase of the project with legislative development. The TWG will be asked to review draft Civil Aviation Safety Regulations (CASRs) and Manual of Standards (MOS) and provide advice to the ASAP.

### A. Does the TWG view that CASA's draft Summary of Consultation (SOC) is an accurate reflection of industry feedback?

YES /  NO

CONSENSUS /  GENERAL CONSENSUS /  DISSENT

#### *Comments:*

The TWG considered that the SOC generally reflected the feedback provided in the public consultation and that the process conducted by CASA was sound. However, as the response number was small (39), the TWG could not confidently state that the feedback in the SOC reflects the views of the broader industry. Additionally, concern was raised that the primary stakeholders (i.e. current CAR30 approval holders) were not sufficiently engaged.

### B. Does the TWG recommend that the ASAP endorse the proposed continuing airworthiness and maintenance policies for future air transport operations?

YES /  NO

CONSENSUS /  GENERAL CONSENSUS /  DISSENT

#### *Comments*

The TWG generally agreed that the ASAP endorse the proposed policies.

The primary concern raised by the TWG was the matter of where the proposed policies were drafted in legislation. This related to the question in the public consultation on whether a second kind of maintenance organisation approval limited to Part 133 and 135 aircraft should be created, or whether the proposed maintenance organisation policies were incorporated into CASR Part 145, thereby making it scalable.

The TWG is split in their view – some members view that there should be a second AMO created. Their reasons for this include that there needs to be a differentiation between the proposed policies and Part 145, the concern (and CASA's admission) on CASA's ability to apply scalable regulations, and the fear of reducing the current standard of Part 145.

One TWG member added to this with their view that Part 145 should remain as is. That is, the highest standards possible for larger aircraft or aircraft undertaking RPT or Scheduled flights. (This policy position was presented by this TWG member and the discussion is outlined in the Meeting Summary of 17

September).

Other TWG members view that the proposed policies should be incorporated into Part 145. Their reasons for this include the view that maintenance organisations should be scalable, and that the rule set should be consistent with the rest of the world (i.e. only have one AMO).

(A summary of the TWG's discussion on this topic is outlined in the Meeting Summaries of 17 and 22 September 2020.)

Despite being split in their view, the TWG acknowledged that this matter would be pertinent during the legislative drafting phase and does not currently impact their support of the proposed policies.

Another primary concern raised by the TWG related to the future implementation of these policies and reemphasised the importance of effective guidance material and assistance to industry. The TWG look forward to continuing to engage with CASA during this vital period.

The TWG also highlighted a previously raised issue with regards to the transition policy for when the future flight operations regulations commence. The concern is the potential for RPT to occur under Part 135 using existing CAR 30 maintenance standards, which is a lower safety standard than these proposed policies. This reemphasises the importance that the proposed policies should be legislated concurrently with the introduction of Part 135 operational rules.

One TWG member added that the approvals should be provided to those MROs servicing Part 135 aircraft not undertaking RPT or Scheduled services (as per proposed policy position presented by this TWG member at the meeting on 17 September).

The TWG also raised concern that there was yet to be a decision with the Part 135 seat-break. This is creating uncertainty while developing the proposed policies as it is still not clear if they will resultingly apply to aircraft with more than 9 seats.

#### **CASA Lead Summary**

**Iftekhar Ahmed**

*Comment:*

I thank the TWG for the collaborative and constructive discussions, despite the challenges associated with running meetings via videoconference.

CASA notes the concerns raised in relation to the issue of legislative packaging and we reiterate that a decision has not been made on that issue. Once the detailed policies have been finalised, CASA will commence work on legislative development and will engage the TWG and ASAP on those matters. CASA also commits to engage with TWG when developing the guidance materials for the effective implementation of the policies. Additionally, CASA will work with the TWG to develop transitional policies that will allay their highlighted concern of CAR30 organisations providing maintenance for aircraft engaging in scheduled services under Part 135.

CASA also notes the concerns raised in relation to consultation and engagement with industry. In addition to working with the TWG to develop these policies and the responses submitted via the Consultation Hub, CASA engaged a further 240 industry members around the country in dedicated face to face presentations during the consultation period, as well as regular engagement with industry through Aviation Safety Seminars. Feedback from all sources has been considered throughout the policy development process.

## **APPENDIX**

1. Extract from ASAP Terms of Reference
2. Meeting Summaries:
  - a. 15 September 2020
  - b. 17 September 2020
  - c. 22 September 2020
  - d. 24 September 2020

**(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.



**AIR TRANSPORT CONTINUING AIRWORTHINESS – ‘CHARTER MAINTENANCE’  
ASAP TECHNICAL WORKING GROUP (TWG)**

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**MEETING SUMMARY**

**15 SEPTEMBER 2020**

**SUMMARY OF MEETING**

- The purpose of the meeting was to re-engage with the TWG to restart work on the project, review the Summary of Consultation (SOC), and identify and discuss any additional issues. During discussion on the impacts of COVID-19, some TWG members noted the uptake of technology by CASA to conduct inspection activities. It was discussed how this could be implemented and expanded on in the future to assist those in remote locations.
- The TWG reviewed the Summary of Consultation (SOC). Annex B of the SOC outlines the key themes and consolidates the variation in feedback received. CASA has provided a response on each of those themes.
- The TWG briefly discussed the results of the question in the consultation which asked respondents on their views on creating an additional kind of Approved Maintenance Organisation (AMO) or if the policies should be included into CASR Part 145. Most respondents said it would be sufficient for the proposed maintenance organisation policies to be included into CASR Part 145. One TWG member expressed their view that a second kind of AMO already exists – CAR 30. However, CASA noted that while the proposed policies intend for CAR 30 organisations to effectively keep doing what they are doing, they will need to transition to CASR. The topic of ‘legislative packaging’ is scheduled for the next TWG meeting.
- The TWG discussed and reviewed the policies where CASA is considering changes due to the responses received from the public consultation. This includes, but not limited to, major defect reporting, key personnel, human factors in maintenance, and training. The TWG was generally supportive of CASA’s disposition to the feedback on these areas and provided specific feedback, such as for the qualification and experience requirements for the safety manager. The TWG discussed the balance between ensuring a safety manager has the required skills and not being overly prescriptive in the rules which specify those requirements.
- The meeting was positive, collaborative, and productive.

**ATTENDANCE**

The Charter Maintenance TWG meeting was attended by:

Shannon Wells	Sheridan Austin
Mike Higgins	Jeff Boyd
Colin Miller	Andrew Bishop
Ernie Shapanis	Warren Bossie
Richard Anderson	

**Apologies:**

Chris Schrapel, Jake Weston

**CASA Representatives:**

Ben Challender	Iftekhar Ahmed
Chris Rapp	Lance Cooper
Brad Cowan	Chris Bowley (observer)

The ASAP Secretariat was represented by Matthew Di Toro.





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**MEETING SUMMARY**

**17 SEPTEMBER 2020**

**SUMMARY OF MEETING**

- The purpose of the meeting was to discuss the topic of the legislative packaging of the proposed policies, and to review the amended pilot maintenance and independent LAME scopes.
- Prior to the meeting, one TWG member circulated their association’s policy on scheduled vs. unscheduled services for Part 135 operations and their recommended maintenance standards (see Appendix 1). The policy is to differentiate the maintenance standards between scheduled (Parts 42/145) and unscheduled (new proposed maintenance standards) services for Part 135 operators. These proposed new standards are the mandating of CAAP 30-4 with additional safety mitigators. The primary concern expressed by the TWG member is that current CAR30 organisations will not be able to transition to Part 145 due to the increased costs associated with the additional requirements and administrative burden.
- The TWG discussed the policy and while members understood the sentiment behind it, the majority of the TWG did not support what was being proposed by the association. Comments made by TWG members included, but is not limited to:
  - The policy (to differentiate maintenance standards between scheduled and unscheduled Part 135 operations) is inconsistent with the new flight operations regulations which removes the distinction between unscheduled and scheduled services. Therefore, it would not make sense to make such a differentiation in the maintenance standards.
  - The notion that scheduled services have a higher risk than unscheduled services is incorrect. When looking at the likelihood component of risk (i.e. frequency of flights), an aircraft could be conducting more unscheduled than scheduled services.
- From this discussion, CASA advised the TWG that the proposed policies that have been developed with the TWG and subject to public consultation would not require current CAR30 organisations to transition to the current standards of Parts 145/42 – the transition would be to the standards resulting from the proposed policies.
- The discussion shifted to the matter of legislative packaging for CASA’s proposed policies – i.e. once the policies are drafted into regulations, which legislative document should they be in? On the matter of maintenance organisations, the question is on whether the proposed policies sit within CASR Part 145 (thereby retaining one maintenance organisation) or they sit within a standalone CASR Part (thereby creating an additional maintenance organisation). CASA reiterated that the maintenance standards will be what are proposed, not the current Parts 145/42.

- CASA advised the TWG that while it had not made a decision, its preferred position would be to place the regulations into CASR Part 145. This would mean Part 145 would need to be amended to reflect the policies that have been agreed (thereby making it scalable), and in effect create a more efficient pathway for maintenance organisations to ‘scale up’ their scope if they wanted to. CASA advised that it is also possible to create two maintenance organisations, but there may be unintended consequences such as an artificial barrier for organisations who want to expand their scope to Part 121 aircraft. Additionally, CASA advised that no other comparable National Aviation Authority (NAA) had two kinds of maintenance organisations (noting the USA ability for operators to include maintenance permissions).
- Some TWG members expressed the view that there should be two maintenance organisations, as there needed to be a differentiation between Part 145 and the proposed policies. Other TWG members expressed an opposing view that there should only be one maintenance organisation, which will be consistent with the rest of the world. (**Note:** This topic was further discussed in Meeting 3 on 22 September 2020).
- The TWG discussed serious concerns with the implementation of Part 145, as well as possible differences in inspectorate interpretation should the policies be placed into Part 145. CASA acknowledged the issues with the past implementation of Part 145 and advised the TWG it intends to learn from that experience. The TWG strongly reiterated the importance of effective guidance material, implementation, and interpretation to support the organisations that are unable to use the resources to implement to the new rules. CASA briefly outlined proposed transitional policies (elaborated in Meeting 3), such as conducting a ‘differences assessment’ rather than a complete re-examination of existing approval; and, the intention for CAR30s to use their current manuals to transition across to the new rules.
- The TWG reviewed and provided feedback on the amendments to the scope of pilot maintenance for Part 133 and Part 135 aircraft which resulted from public consultation. CASA will consider and incorporate the TWG’s feedback where appropriate and provide a revised version.
- The meeting was productive, with discussion to continue next week on transitional policies and SMS.

## ATTENDANCE

The Charter Maintenance TWG meeting was attended by:

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

## Apologies:

Jake Weston

**CASA Representatives:**

Ben Challenger	Iftekhar Ahmed
Chris Rapp	Lance Cooper
Brad Cowan	Chris Bowley (observer)

The ASAP Secretariat was represented by Matthew Di Toro.

**Appendix**

1. RAAA Draft Policy on Scheduled vs Unscheduled services for Part 135 operations

## **RAAA Policy on Scheduled vs Unscheduled services for PART 135 Operations**

### **ISSUE**

The current view of CASA in determining the maintenance requirements for charter operators conducting **Unscheduled** or 'on demand' or 'ad-hoc' services is both unjustified and unsustainable. The CASA view is that charter operators providing **Unscheduled** services need to maintain their aircraft to the same highest standards as applied to the largest airline operators in the country. That is, CASR PARTs 42 and 145.

### **RECOMMENDATION**

Those charter operators wishing to now engage in **Scheduled** services should indeed be subject to upgrading to the highest maintenance standards.

However, those operators providing **Unscheduled** services should be regulated under the policy determined by the CASA Sector Safety Risk Profile. That is largely the mandating of CAAP30-4.

### **Background**

Briefly there should be 3 tiers of maintenance regulation.

1. The first tier should provide, as a minimum, for **SAFE** operations and is the minimum acceptable rule set. This covers private operations.
2. The second-tier rule set provides **SAFER** operations. This is PART135M for **Unscheduled** operations.
3. The third tier is the highest standard and provides the **SAFEST** operations for **Scheduled** operations. This is, and should remain as, PARTs 42/145).

### **Aircraft occupants are 'Participants' in Unscheduled operations.**

Participants voluntarily engage in an aviation activity and accept the risks of their involvement. These occupants should be informed of the difference between the PART 135 and PART 121 regulatory *operational* environment and Parts 42/145 AND 135 M *maintenance* environment. This environment is where the occupants are afforded a *safer* environment compared to private operations.

### **Aircraft occupants are 'Passengers' in Scheduled operations.**

Passengers are not expected or assumed to have knowledge of the risks to which they are exposed and have little or no control over the risks (other than choosing not to fly). These occupants should be afforded the *safest* environment. These are PARTS 121, 42 and 145 and should remain so.

### **RAAA Policy**

Occupants engaged in Private operations are covered by PART 91 and the RAAA does not have a view on the need for any additional safety mitigators for this sector.

**Participants** carried on unscheduled operations should be afforded a SAFER environment than Private operations. This means PARTS 135 operational requirements and 135M maintenance requirements (with an option of PARTS 41/145 subject to a business case).

**Passengers** carried on Scheduled operations should be afforded the SAFEST possible environment. This means PARTS 135 or PARTS 121 operational requirements and PARTS 42/145 for maintenance requirements.

The table below gives a brief pictorial view of the RAAA position.

<b>Operational PART</b>	<b>Maintenance PART</b>	<b>Services</b>	<b>Classification</b>
<b>121</b>	<b>42/145</b>	<b>Scheduled OR Unscheduled</b>	<b>SAFEST</b>
<b>135</b>	<b>42/145</b>	<b>Scheduled OR Unscheduled (optional) and Aeromedical</b>	<b>SAFER</b>
<b>135</b>	<b>135M</b>	<b>Unscheduled Only</b>	<b>SAFER</b>
<b>91</b>	<b>TBA</b>	<b>Unscheduled Only</b>	<b>SAFE</b>



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**MEETING SUMMARY**

**22 SEPTEMBER 2020**

**SUMMARY OF MEETING**

- The purpose of the meeting was to discuss the transitional arrangements CASA should consider developing to assist industry with transition to the proposed policies.
- Noting the offline discussion amongst the TWG, the TWG enquired on CASA’s intentions for the proposed policies, referencing the legislative packaging discussion from the previous meeting.
- CASA discussed with the TWG that this project commenced engagement with industry at the policy level to look at what the new legislation should include as opposed to commencing engagement to review draft legislation. CASA advised that from a policy perspective, their view is that it does not matter where the legislation is located and reiterated that wherever the policies sit in legislation, there will still need to be some sort of transition. CASA explained their preferred position to place the regulations into CASR Part 145, reiterating the reasons from Meeting 2 (i.e. no other comparable NAAs have two kinds of maintenance organisations; having a second maintenance organisation with limited scope could create artificial barriers and complexity for industry). However, CASA confirmed no decision has been made on the matter.
- Some TWG members stated that they continue to be supportive of developing a different set of regulations for the proposed maintenance organisation policies. The two reasons stated for this are the fear of reducing the current standard of Part 145, and the concern on CASA’s ability to apply scalable regulations such as in cases of inconsistent inspector interpretation, poor guidance material and assistance. These members stated they could not provide support for the policies to be drafted into Part 145 without seeing what it looks like.
- Some other TWG members have the view that the proposed policies should be drafted into Part 145 believing that every maintenance organisation needs to be scalable and to be consistent with the rest of the world. However, they also emphasise their concern on CASA’s ability to apply scalable regulations. One TWG member also noted there is a large cost to change manuals and suggested CASA accept current CAR30 manuals with changes as part of a transitional arrangement.
- CASA acknowledged its historical issues with drafting and implementing scalable regulations, inconsistent interpretations across regions, and its poor implementation efforts of Part 145. CASA assured the TWG that lessons have been learned and that the issues of the past are not repeated, and significant work will be done to assist industry to transition, wherever the legislation is drafted. CASA reiterated the proposed policies for Part 133 and Part 135 are not the same as what are currently in Part 145/42 using the example of allowing pilot maintenance and the use of independent LAMEs for maintenance.

- Referencing the discussion in Meeting 2, the majority of TWG members agreed that one maintenance standard should be applied to Part 135 aircraft (and Part 133) and that there should be no distinction between scheduled and unscheduled services.
- The TWG discussed transitional arrangements for maintenance organisations. The TWG are supportive of CASA providing a gap analysis between old and new policies; and to conduct a differences assessment to give a CASR approval. The TWG also emphasised the importance of the regions applying and assessing the same standards and that there is a uniform approach when conducting assessments. CASA intends to develop and provide many different artefacts to assist with implementation of and transition to the new policies.
- The TWG discussed the net safety benefit of the proposed policies, noting that along with the cost associated with transition, some proposed requirements will have a cost impost to some organisations. CASA acknowledged the primary objective of the proposed policies are administrative to transition to CASR where it considered the Sector Safety Risk Profile (SSRP) for CAR30 organisations and the TWG for any potential enhancements, such as SMS and human factors. One TWG member provided a detailed example of the cost associated with transitioning to higher standards.
- The TWG discussed that small operators and maintenance organisations will have difficulty transitioning to a Continuing Airworthiness Maintenance Organisation (CAMO) with the current Part 42 requirements, specifically, having personnel who will meet the prescriptive qualification requirements of the Continuing Airworthiness Manager (CAM). CASA confirmed that it intends to move away from overly prescriptive qualifications for those positions to provide some flexibility to ensure that it is an individual's overall competence for the position is considered.

## ATTENDANCE

The Charter Maintenance TWG meeting was attended by:

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

## Apologies:

Jake Weston

## CASA Representatives:

Ben Challenger	Iftekhar Ahmed
Chris Rapp	Lance Cooper
Brad Cowan	Chris Bowley (observer)

The ASAP Secretariat was represented by Matthew Di Toro.



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**MEETING SUMMARY**

**24 SEPTEMBER 2020**

**SUMMARY OF MEETING**

- The purpose of the meeting was to discuss the proposed Safety Management System (SMS) policies for maintenance organisations.
- The TWG discussed the necessity to ensure the proposed SMS framework for maintenance organisations is the same as the framework in other CASR Parts to ensure consistency (e.g. the same as Part 135). CASA advised that the proposed policies address the applicable elements of SMS in Appendix 2 of ICAO Annex 19 and integrate SMS elements into the overall requirements for an AMO. The TWG also raised that, in many cases, one AOC will have one SMS manual which incorporates the requirements of different CASR Parts.
- One TWG member raised concern regarding an organisation’s safety policy that references staff ‘behaviours’ and ‘disciplinary action’ is not in CASA’s remit but rather dealt with in employment law. CASA advised that the terminologies are taken from the SMS standard in ICAO Annex 19 and the intent is to enable a positive safety culture. This can be reworded to show this more effectively.
- The TWG discussed the notion of an Accountable Manager also holding the role of Safety Manager and/or Quality Manager as it may be appropriate for some small business with few resources. However, it was also discussed that there needs to be a level of independence, such as the requirement for an independent audit or investigation.
- The TWG will be provided with amendments to the policy proposal to review offline over the next few weeks.
- The meeting was positive and collaborative. The TWG will meet again via videoconference to discuss any final matters and deliberate to provide their formal recommendations to the ASAP on the proposed policies.

**ATTENDANCE**

The Charter Maintenance TWG meeting was attended by:

Shannon Wells	Sheridan Austin
Mike Higgins	Chris Schrapel
Ernie Shapanis	Richard Anderson



**Apologies:**

Warren Bossie, Jeff Boyd, Andrew Bishop, Colin Miller, Jake Weston

**CASA Representatives:**

Ben Challenger	Iftekhhar Ahmed
Chris Rapp	Lance Cooper
Brad Cowan	Chris Bowley (observer)

The ASAP Secretariat was represented by Matthew Di Toro.