

# **Training and checking determinations for CASR Parts 119, 121, 133, 135 and 138 – plain English Guide**

## **Background**

In June 2020, CASA published a consultation document on its plans for transitioning operators and their personnel to the new Flight Operations regulations. The document flagged CASA intentions to treat certain training and other things done under the old regulations as meeting the requirements of the new regulations.

In March 2021 the Civil Aviation Legislation Amendment (Flight Operations – Consequential Amendments and Transitional Provisions) Regulations were made, to address a broad range of transitional matters for the new Flight Operations regulations. These regulations made an amendment to Part 202 of CASR, to include regulation 202.418. This regulation enables CASA to determine what “training or checking event” under the old legislation is deemed to meet a training and checking requirement of the new regulations, and for how long. A “training or checking event” is defined very broadly, including successful completion of a check, test, flight review or assessment of competency, completing experience, and completing a flight or series of flights.

The training and checking determinations, for Parts 119, 121, 133, 135 and 138 of CASR were made by CASA on 28 November 2021.

The purpose of this document is to present and summarise the key elements of these determinations in plainer English, as the legal instruments themselves are relatively lengthy, repetitive and complex. The determination instrument should be read together with this document.

References below to “old legislation” mean the CARs and CAOs, as they existed immediately before 2 December 2021.

References below to “new legislation” mean the new CASRs and their MOSs, as they exist on and from 2 December 2021.

References to an operator’s training and checking manual includes relevant text included in the operator’s operations manual.

Note: the numbered provisions of this document are not necessarily aligned with the item numbers in the various legal instruments.

## **Part 119 - HFP&NTS training for operator operational safety-critical personnel**

This determination relates to human factors principles and non-technical skills training. Operator personnel mentioned in subregulation 119.180(2) are deemed to meet the requirements of regulation 119.180 for HFP&NTS training, based on either the HFP& NTS training provided them under CAO 82.3 or CAO 83.5, or on the basis of performing duties unsupervised for the operator before 2 December 2021. The deemed compliance with the Part 119 provision ends 2 December 2023.

The provision of HFP&NTS training to other operational safety-critical personnel may be managed under the operator’s exposition.

## **Part 121 – training and checking requirements for flight crew and cabin crew**

### **Flight crew members (FCM)**

1. For the purpose of regulation 121.475 and for an FCM who was under the operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021:

(a) the FCM is deemed to have successfully completed the operator's initial training based on comparable training under the operator's TCO and training and checking manual

(b) the FCM is deemed to have successfully completed the operator's conversion training for the kind of aeroplane based on comparable training under the operator's TCO and training and checking manual

(c) the FCM is deemed to have successfully completed the operator's line check for the kind of aeroplane, based on a line check or a proficiency check/check of competency, under the operator's TCO and training and checking manual

(d) the FCM is deemed to have successfully completed the operator's refresher training and refresher check for the kind of aeroplane, based on comparable training and a proficiency check/check of competency under the operator's TCO in accordance with the old legislation and the operator's training and checking manual

(e) the FCM is deemed to have a valid proficiency check (initial or recurrent) for the kind of aeroplane, based on a proficiency check/check of competency under the operator's TCO, in accordance with the old legislation and the operator's training and checking manual

(f) the FCM is deemed to have successfully completed the operator's annual and 3-yearly emergency and safety equipment training and check for the kind of aeroplane, based on holding a valid CAO 20.11 proficiency test (initial or recurrent) under the old legislation.

2. The deemed compliance with the initial training and conversion training does not expire.

3. The deemed compliance with the requirement for an FCM proficiency check for the kind of aeroplane expires at the earliest of:

(a) when the proficiency check under the old legislation expires

(b) 8 months after the proficiency check under the old legislation

(c) when the FCM undertakes a proficiency check under the new legislation

(d) 2 December 2022.

4. Deemed compliance with the requirements for a line check, refresher check and annual emergency and safety equipment check all expire when the check or test upon which they were based expires, being not later than 2 December 2022. Deemed compliance with the 3-yearly emergency and safety equipment check expires 3 years after the last CAO 20.11 emergency procedures proficiency test, and not later than 2 December 2024.

5. For an FCM not under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021, deemed compliance with the new legislation is based generally on the performance of unsupervised duties by the FCM for the operator and the kind of aeroplane. The requirement to have a valid proficiency check is satisfied by the FCM having an instrument proficiency check that is valid for the aeroplane under Part 61 of CASR. In this case, deemed

compliance with the proficiency check requirement of Part 121 expires when the FCM's instrument proficiency check is no longer valid for the aeroplane, and not later than 2 December 2022.

### **Cabin crew members (CCM)**

6. For the purpose of regulation 121.655 and a CCM who was under the operator's TCO immediately before 2 December 2021, the CCM is deemed to meet the prescribed training and checking requirements for a senior cabin crew member on the basis of relevant training under the operator's TCO, and a check of competency or line check in accordance with the operator's training and checking manual, that included a check of the relevant duties.

7. For the purpose of regulation 121.640 and a CCM who was under the operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021:

(a) the CCM is deemed to have successfully completed the operator's initial training based on comparable training under the operator's TCO and training and checking manual

(b) the CCM is deemed to have successfully completed the operator's conversion training for the aeroplane type based on comparable training under the operator's TCO and training and checking manual

(c) the CCM is deemed to have successfully completed the operator's differences for the aeroplane based on comparable training under the operator's TCO and training and checking manual

(d) the CCM is deemed to have successfully completed the operator's annual and 3-yearly emergency and safety equipment training and check for the aeroplane type, based on holding a valid CAO 20.11 proficiency test (initial or recurrent)

(e) the CCM is deemed to have a valid line check for the aeroplane, based on a line check or a proficiency check under the operator's TCO and training and checking manual, or a CAO 20.11 emergency procedures proficiency test.

8. For the purpose of regulation 121.655, the CCM is deemed to meet the prescribed English language proficiency requirements on the basis of the conduct of at least 1 charter or regular public transport flight for the operator while not under training or supervision, unless the training or supervision was for the purpose of regaining currency or competency.

9. The deemed compliance with the senior cabin crew member training, initial training, conversion training, differences training and English language proficiency requirements do not expire.

10. Deemed compliance with the requirements for a line check, refresher and annual emergency and safety equipment check expire when the check or test upon which they were based expires and not later than 2 December 2022. Deemed compliance with the 3-yearly emergency and safety equipment check expires 3 years after the last CAO 20.11 emergency procedures proficiency test, and not later than 2 December 2024.

11. For the purpose of regulation 121.750, a CCM is deemed to have a valid annual emergency and safety equipment check for the operator and aeroplane type, on the basis of holding a valid CAO 20.11 emergency procedures proficiency test under the old legislation, or the unsupervised conduct of relevant duties on a charter passenger flight. The deemed compliance expires when the CAO 20.11 proficiency test expires, and otherwise not later than 2 December 2022. Regulation 121.750 relates to a flight when a cabin crew member is carried but is not required under the new legislation.

## **Part 133 – training and checking requirements for flight crew, air crew, cabin crew and medical transport specialists**

### **Flight crew members (FCM)**

1. For the purposes of regulation 133. 370:

(a) the FCM is deemed to have successfully completed the operator’s general emergency training and general emergency check of competency (initial or recurrent) for the rotorcraft, based on holding a valid CAO 20.11 proficiency test (initial or recurrent) for the rotorcraft

(b) the deemed compliance expires the earlier of when the CAO 20.11 proficiency test expires and 2 December 2022, other than for the use of life rafts or underwater escape. For the use of life rafts or underwater escape, the deemed compliance expires the earlier of 3 years after the CAO.2011 proficiency test and 2 December 2024.

2. For an FCM who was under the operator’s CAR 217 training and checking organisation (TCO) immediately before 2 December 2021:

(a) the FCM is deemed to have successfully completed the operator’s conversion training for the type or class of rotorcraft based on comparable training under the operator’s TCO and training and checking manual

(b) the FCM is deemed to have successfully completed the operator’s line training and line check for the rotorcraft, based on comparable training, and a line check or a proficiency check, under the operator’s TCO and training and checking manual

(c) the FCM is deemed to have a valid proficiency check (initial or recurrent) for the type or class of rotorcraft, based on a proficiency check under the operator’s TCO, in accordance with the old legislation and the operator’s training and checking manual.

3. The deemed compliance with the general emergency training, conversion training, and line training and line check, do not expire. The FCM is, however, subject to remedial training if they fail a subsequent general emergency check of competency.

4. The deemed compliance with the requirement for an FCM proficiency check (initial or recurrent) for the type or class of rotorcraft expires at the earliest of:

(a) when the proficiency check under the old legislation expires

(b) for IFR flights and NVFR flights, 8 months after the proficiency check under the old legislation

(c) for VFR flights by day, 1 year after the proficiency check under the old legislation

(d) when the FCM undertakes a proficiency check under the new legislation

(e) 2 December 2022.

5. For an FCM not under an operator’s CAR 217 training and checking organisation (TCO) immediately before 2 December 2021, deemed compliance with the new legislation is based generally on the performance of unsupervised duties by the FCM for the operator and the type or class of rotorcraft. The requirement to have a valid proficiency check is satisfied by the FCM having, for VFR flights, a flight review that is valid for the rotorcraft under Part 61 of CASR, and for IFR flights, an instrument proficiency check that is valid for the rotorcraft under Part 61 of CASR. This deemed compliance with the proficiency test requirements of Part 133 expires when the flight review or instrument proficiency test expires, as applicable, and not later than 2 December 2022.

## **Air crew members (ACM) and cabin crew members (CCM), as applicable**

6. For the purposes of regulation 133.455 for an ACM and regulation 133.425 for a CCM:
  - (a) the ACM or CCM is deemed to have successfully completed the operator's general emergency training and general emergency check of competency (initial or recurrent) for the rotorcraft, based on holding a valid CAO 20.11 proficiency test (initial or recurrent) for the rotorcraft
  - (b) the deemed compliance expires the earlier of when the CAO 20.11 proficiency test expires and 2 December 2022, other than for the use of life rafts or underwater escape. For the use of life rafts or underwater escape, the deemed compliance expires the earlier of 3 years after the CAO 20.11 proficiency test and 2 December 2024.
7. For an ACM or CCM who was under the operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021,
  - (a) the ACM or CCM is deemed to have successfully completed the operator's conversion training for the kind of rotorcraft based on comparable training under the operator's TCO and training and checking manual
  - (b) the ACM or CCM is deemed to have successfully completed the operator's line training and line check for the rotorcraft, based on comparable training and a line check or a proficiency check, under the operator's TCO and training and checking manual
  - (c) the ACM or CCM is deemed to have successfully completed the operator's differences training for the kind of rotorcraft, based on comparable training under the operator's TCO and training and checking manual
  - (d) the ACM or CCM is deemed to have a valid proficiency check (initial or recurrent) for the kind of rotorcraft, based on a proficiency check under the operator's TCO, in accordance with the old legislation and the operator's training and checking manual.
8. The deeming provisions for general emergency training, conversion training, line training and line check, and differences training, do not expire. The ACM or CCM is, however, subject to remedial emergency training if they fail a subsequent general emergency check of competency.
9. The deemed compliance with the requirement for a proficiency check (initial or recurrent) for the kind of rotorcraft expires at the earliest of:
  - (a) when the proficiency check under the old legislation expires
  - (b) when the ACM or CCM undertakes a proficiency check under the new legislation
  - (c) 2 December 2022.
10. For an ACM or CCM not under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021, deemed compliance with the new legislation is based generally on the performance of unsupervised duties by the ACM or CCM for the operator and kind rotorcraft. The deemed compliance with the proficiency check requirements of Part 133 expires the earlier of:
  - (a) when the ACM or CCM undertakes a proficiency check under the new legislation
  - (b) 2 December 2022.

## **Medical transport specialists (MTS)**

11. For the purposes of regulation 133.470 for an MTS:

- (a) an MTS is deemed to have successfully completed the operator's general emergency training and general emergency check of competency (initial or recurrent) for the rotorcraft, based on holding a valid CAO 20.11 proficiency test (initial or recurrent) for the rotorcraft
- (b) the deemed compliance expires the earlier of when the CAO 20.11 proficiency test expires and 2 December 2022, other than for the use of life rafts or underwater escape. For the use of life rafts or underwater escape, the deemed compliance expires the earlier of 3 years after the CAO 20.11 proficiency test and 2 December 2024
- (c) for an MTS who does not have a valid CAO 20.11 proficiency test immediately before 2 December 2021, deemed compliance is based on the MTS having performed unsupervised duties for the operator.

12. For an MTS who was under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021:

- (a) the MTS is deemed to have successfully completed the operator's conversion training for the kind of rotorcraft based on comparable training under the operator's TCO and training and checking manual
- (b) the MTS is deemed to have successfully completed the operator's line training and line check for the rotorcraft, based on comparable training and a line check, or a proficiency check, under the operator's TCO and training and checking manual
- (c) the MTS is deemed to have successfully completed the operator's differences training for the kind of rotorcraft, based on comparable training under the operator's TCO and training and checking manual
- (d) the MTS is deemed to have a valid proficiency check (initial or recurrent) for the kind of rotorcraft, based on a proficiency check under the old legislation and the operator's training and checking manual.

13. The deeming provisions for general emergency training, conversion training, line training and line check, and differences training, do not expire. The MTS is, however, subject to remedial emergency training if they fail a subsequent general emergency check of competency.

14. The deemed compliance with the requirement for a proficiency check (initial or recurrent) for the kind of rotorcraft expires at the earliest of:

- (a) when the proficiency check under the old legislation expires
- (b) when the MTS undertakes a proficiency check under the new legislation
- (c) 2 December 2022.

15. For an MTS not under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021, deemed compliance with the new legislation is based on the performance of unsupervised duties by the MTS for the operator. The deemed compliance with the proficiency check requirements of Part 133 for the MTS expires the earlier of:

- (a) when the MTS undertakes a proficiency check under the new legislation
- (b) 2 December 2022.

## **Part 135 – training and checking requirements for flight crew, air crew and medical transport specialists**

### **Flight crew members (FCM)**

1. For the purposes of regulation 135.380:

(a) an FCM is deemed to have successfully completed the operator's general emergency training and general emergency check of competency (initial or recurrent) for the aeroplane, based on holding a valid CAO 20.11 proficiency test (initial or recurrent) for the aeroplane

(b) the deemed compliance expires the earlier of when the CAO 20.11 proficiency test expires and 2 December 2022, other than for the use of life rafts. For the use of life rafts, the deemed compliance expires the earlier of 3 years after the CAO.2011 proficiency test and 2 December 2024.

2. For an FCM who was under the operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021:

(a) the FCM is deemed to have successfully completed the operator's conversion training for the type or class of aeroplane based on comparable training under the operator's TCO and training and checking manual

(b) the FCM is deemed to have successfully completed the operator's line training and line check for the aeroplane, based on comparable training, and a line check or a proficiency check, under the operator's TCO and training and checking manual

(c) the FCM is deemed to have a valid proficiency check (initial or recurrent) for the type or class of aeroplane, based on a proficiency check under the operator's TCO, in accordance with the old legislation and the operator's training and checking manual.

3. The deemed compliance with the general emergency training, conversion training, and line training and line check, do not expire. The FCM is, however, subject to remedial emergency training if they fail a subsequent general emergency check of competency.

4. The deemed compliance with the requirement for an FCM proficiency check (initial or recurrent) for the type or class of aeroplane expires at the earliest of:

(a) when the proficiency check under the old legislation expires

(b) for IFR flights and NVFR flights, 8 months after the proficiency check under the old legislation

(c) for VFR flights by day, 1 year after the proficiency check under the old legislation

(d) when the FCM undertakes a proficiency check under the new legislation

(e) 2 December 2022.

5. For an FCM not under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021, deemed compliance with the new legislation is based generally on the performance of unsupervised duties by the FCM for the operator and the type or class of aeroplane. The requirement to have a valid proficiency check is satisfied by the FCM having, for VFR flights, a flight review that is valid for the aeroplane under Part 61 of CASR, and for IFR flights, an instrument proficiency check that is valid for the aeroplane under Part 61 of CASR. This deemed

compliance with the proficiency test requirements of Part 135 expires when the flight review or instrument proficiency test expires, as applicable, being not later than 2 December 2022.

### **Air crew members (ACM)**

6. For the purposes of regulation 135.445:

(a) the ACM is deemed to have successfully completed the operator's general emergency training and general emergency check of competency (initial or recurrent) for the aeroplane, based on holding a valid CAO 20.11 proficiency test (initial or recurrent) for the aeroplane

(b) the deemed compliance expires the earlier of when the CAO 20.11 proficiency test expires and 2 December 2022, other than for the use of life rafts. For the use of life rafts, the deemed compliance expires the earlier of 3 years after the CAO 20.11 proficiency test and 2 December 2024.

7. For an ACM who was under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021:

(a) the ACM is deemed to have successfully completed the operator's conversion training for the kind of aeroplane based on comparable training under the operator's TCO and training and checking manual

(b) the ACM is deemed to have successfully completed the operator's line training and line check for the aeroplane, based on comparable training and a line check or a proficiency check, under the operator's TCO and training and checking manual

(c) the ACM is deemed to have successfully completed the operator's differences training for the kind of aeroplane, based on comparable training under the operator's TCO and training and checking manual

(d) the ACM is deemed to have a valid proficiency check (initial or recurrent) for the kind of aeroplane, based on a proficiency check under the operator's TCO, in accordance with the old legislation and the operator's training and checking manual.

8. The deeming provisions for general emergency training, conversion training, line training and line check, and differences training, do not expire. The ACM is, however, subject to remedial emergency training if they fail a subsequent general emergency check of competency.

9. The deemed compliance with the requirement for a proficiency check (initial or recurrent) for the kind of aeroplane expires at the earliest of:

(a) when the proficiency check under the old legislation expires

(b) when the ACM undertakes a proficiency check under the new legislation

(c) 2 December 2022.

10. For an ACM not under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021, deemed compliance with the new legislation is based generally on the performance of unsupervised duties by the ACM for the operator and the kind of aeroplane. The deemed compliance with the proficiency check requirements of Part 135 expires the earlier of:

(a) when the ACM or undertakes a proficiency check under the new legislation

(b) 2 December 2022.



## Medical transport specialists (MTS)

11. For the purposes of regulation 135.460 for an MTS:

- (a) an MTS is deemed to have successfully completed the operator's general emergency training and general emergency check of competency (initial or recurrent) for the aeroplane, based on holding a valid CAO 20.11 proficiency test (initial or recurrent) for the aeroplane
- (b) the deemed compliance expires the earlier of when the CAO 20.11 proficiency test expires and 2 December 2022, other than for the use of life rafts. For the use of life rafts, the deemed compliance expires the earlier of 3 years after the CAO 20.11 proficiency test and 2 December 2024
- (c) for an MTS who does not have a valid CAO 20.11 proficiency test immediately before 2 December 2021, deemed compliance is based on the MTS having performed unsupervised duties for the operator.

12. For an MTS who was under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021:

- (a) the MTS is deemed to have successfully completed the operator's conversion training for the kind of aeroplane based on comparable training under the operator's TCO and training and checking manual
- (b) the MTS is deemed to have successfully completed the operator's line training and line check for the aeroplane, based on comparable training and a line check, or a proficiency check, under the operator's TCO and training and checking manual
- (c) the MTS is deemed to have successfully completed the operator's differences training for the kind of aeroplane, based on comparable training under the operator's TCO and training and checking manual
- (d) the MTS is deemed to have a valid proficiency check (initial or recurrent) for the kind of aeroplane, based on a proficiency check under the old legislation and the operator's training and checking manual.

13. The deeming provisions for general emergency training, conversion training, line training and line check, and differences training, do not expire. The MTS is, however, subject to remedial training if they fail a subsequent general emergency check of competency.

14. The deemed compliance with the requirement for a proficiency check (initial or recurrent) expires at the earliest of:

- (a) when the proficiency check under the old legislation expires
- (b) when the MTS undertakes a proficiency check under the new legislation
- (c) 2 December 2022.

15. For an MTS not under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021, deemed compliance with the new legislation is based generally on the performance of unsupervised duties by MTS for the operator and kind of aeroplane. The deemed compliance with the proficiency check requirements of Part 135 for the MTS expires the earlier of:

- (a) when the MTS undertakes a proficiency check under the new legislation
- (b) 2 December 2022.

## **Part 138 – training and checking requirements for flight crew and air crew**

### **Flight crew members (FCM)**

1. For the purposes of regulation 138.475:

(a) an FCM is deemed to have successfully completed the operator's general emergency training and general emergency check of competency (initial or recurrent) for the kind of aircraft, based on holding a valid CAO 20.11 proficiency test (initial or recurrent) for the kind of aircraft

(b) the deemed compliance expires the earlier of when the CAO 20.11 proficiency test expires and 2 December 2022, other than for the use of life jackets, life rafts or underwater escape. For the use of life jackets, life rafts or underwater escape, the deemed compliance expires the earlier of 3 years after the CAO 20.11 proficiency test and 2 December 2024.

2. For an FCM who was under the operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021:

(a) the FCM is deemed to have successfully completed the operator's conversion training for the kind of aircraft based on comparable training under the operator's TCO and training and checking manual

(b) the FCM is deemed to have a valid proficiency check (initial or recurrent) for the kind of aircraft, based on a proficiency check under the operator's TCO, in accordance with the old legislation and the operator's training and checking manual.

3. The deemed compliance with the conversion training does not expire.

4. The deemed compliance with the requirement for an FCM proficiency check (initial or recurrent) for a kind of aircraft expires at the earliest of:

(a) when the proficiency check under the old legislation expires

(b) for IFR flights and NVFR flights, 8 months after the proficiency check under the old legislation

(c) for VFR flights by day, 1 year after the proficiency check under the old legislation;

(d) when the FCM undertakes a proficiency check under the new legislation

(e) 2 December 2022.

5. For an FCM not under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021, deemed compliance with the new legislation is based generally on the performance of unsupervised duties by the FCM for the operator and the kind of aircraft. The requirement to have a valid proficiency check is satisfied by the FCM having, for VFR flights, a flight review that is valid for the aircraft under Part 61 of CASR, and for IFR flights, an instrument proficiency check that is valid for the aircraft under Part 61 of CASR. This deemed compliance with the proficiency test requirements of Part 138 expires when the flight review or instrument proficiency test expires, as applicable, and not later than 2 December 2022.

## **Air crew members (ACM)**

6. For the purposes of regulation 138.540:

(a) the ACM is deemed to have successfully completed the operator's general emergency training and general emergency check of competency (initial or recurrent) for the aircraft, based on a holding a valid CAO 20.11 proficiency test (initial or recurrent) for the aircraft

(b) the deemed compliance expires the earlier of when the CAO 20.11 proficiency test expires and 2 December 2022, other than for the use of life jackets, life rafts and underwater escape. For the use of life jackets, life rafts and underwater escape, the deemed compliance expires the earlier of 3 years after the CAO 20.11 proficiency test and 2 December 2024.

7. For an ACM who was under an operator's CAR 217 training and checking organisation (TCO) immediately before 2 December 2021:

(a) the ACM is deemed to have successfully completed the operator's conversion training for the kind of aircraft based on comparable training under the operator's TCO and training and checking manual

(b) the ACM is deemed to have a valid proficiency check (initial or recurrent) for the kind of aircraft, based on a proficiency check under the operator's TCO, in accordance with the old legislation and the operator's training and checking manual.

8. The deemed compliance with the conversion training does not expire.

9. The deemed compliance with the requirement for a proficiency check (initial or recurrent) expires at the earliest of:

(a) when the proficiency check under the old legislation expires

(b) when the ACM undertakes a proficiency check under the new legislation

(c) 2 December 2022.

10. For an ACM not under an operator's CAR 217 training and checking organisation (TCO) immediately before the commencement date, deemed compliance with the new legislation is based generally on the performance of unsupervised duties by the ACM for the operator and kind of aircraft. The deemed compliance with the proficiency check requirements of Part 138 expires the earlier of:

(a) when the ACM or undertakes a proficiency check under the new legislation

(b) 2 December 2022.

## **Task specialists**

Training and checking requirements for a "task specialist" may be managed under the operator's operations manual.