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Australian Government
Civil Aviation Safety Authority

TRANSITION AND GUIDANCE

Chief RePL Instructor

May 2024

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Acknowledgement of Country

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

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References

Acronyms

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

Table 1. Acronyms

Acronym and abbreviation	Description
CASA	Civil Aviation Safety Authority
CRI	chief remote pilot licence (RePL) instructor
CRP	chief remote pilot
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
MOS	Part 101 (Unmanned Aircraft and Rockets) Manual of Standards 2019 (as amended)
MTOW	maximum take-off weight
ReOC	remotely piloted aircraft operator's certificate
RePL	remote pilot licence
RPA	remotely piloted aircraft

Definitions

Terms that have specific meaning within this guidance document are defined in the table below.

Table 2. Definitions

Term	Definition
ad-hoc	when necessary or needed
applicants for a RePL training organisation	means a person applying to provide training in the operation of RPA for the grant of a remote pilot licence; however, has not yet been certified under regulation 101.335 for the conduct of RePL training
CASA Sharefile	a CASA Sharefile is a file sharing service that enables users to easily and securely exchange documents
category of RPA	has the same meaning as paragraph (a) for the definition 'type' in section 1.04 of the Part 101 MOS
deemed CRI	the person who, on 10 July 2024, is the CRP
documented practices and procedures	for a certified RPA operator, means the written practices and procedures of the operator, as existing or in force from time to time, that, to the extent required by the MOS, have been approved in writing by CASA
nominated CRI	a person, other than the CRP or deemed CRI, who has been nominated by the RePL training organisation
nominated personnel	means the following personnel of a certified RPA operator:

Term	Definition
	(a) the chief executive officer (the CEO) (b) the chief remote pilot (the CRP) (ba) if the operator is a RePL training organisation — the chief RePL instructor (CRI) (c) the maintenance controller
RePL training course	is the expression used to denote an RPL training course as defined in the CASR dictionary
RePL training course instructor	a person who satisfies the requirements in section 2.30 of the Part 101 MOS, responsible for the delivery of a RePL training course
RePL training organisation	means a person certified as an RPA operator under regulation 101.335 of CASR whose operations include the conduct of a RePL training course
RPL training course	means training in the operation of RPA for the grant of a remote pilot licence that is conducted: (a) by a person who is certified under regulation 101.335 and whose operations include conducting training; and (b) in accordance with any standards or requirements prescribed by the Part 101 MOS
Schedule 2 of the Amendment Instrument	refers to the standards listed in Schedule 2 Amendments – Chief RePL Instructor of the Part 101 Manual of Standards (Chief Remote Pilot Licence Instructor and Other Matters) Amendment Instrument 2024
type of RPA	has the same meaning as 'type' in section 1.04 of the Part 101 MOS

Reference material

The reference material used in this guidance document are listed in the table below.

Table 3. Reference material

Document type	Title
AC 101-01	Guide to operators and crew on the safe and legal operation of uncrewed aircraft in all classes of airspace
Annex A to AC 101-01	Guide to training providers intending to deliver RePL training
Part 101 of CASR	Unmanned aircraft and rockets
Part 101 MOS	Part 101 (Unmanned Aircraft and Rockets) Manual of Standards 2019

Revision history

Revisions to this guidance document are recorded below in order of most recent first.

Table 4. Revision history

Version number	Date	Parts and sections	Details
1.0	May 2024	All	Initial issue

1 Introduction

On 4 April 2024 the [Part 101 Manual of Standards \(Chief Remote Pilot Licence Instructor and Other Matters\) Amendment Instrument 2024](#) (the Part 101 MOS Amendment Instrument) was made.

The amendments in Schedule 2 of the Part 101 MOS Amendment Instrument take effect **10 July 2024**. These amendments affect both CASA-approved RePL (remote pilot licence) training organisations as well as applicants for a RePL training organisation. The amendments introduce a Chief Remote Pilot Licence (RePL) Instructor (CRI) role as a nominated personnel position and simplify qualification requirements for RePL instructors.

2 Applicability

The aim of this guide is primarily to assist CASA-approved RePL training organisations in their transition to the new standards prescribed in Schedule 2 of the Part 101 MOS Amendment Instrument.

Applicants for a RePL training organisation may use the guidance in section 3.3.2 of this guide to assist with developing their proposed documented practices and procedures and supporting documentation. However, the assessment process detailed in section 3.4 of this guide is not applicable. Applicants for a RePL training organisation should refer to section 5 of [Annex A to AC101-01 - Remote Pilot Licence \(RePL\) Training Course - CASA Guidance](#).

3 Chief RePL Instructor

This section offers guidance to CASA-approved RePL training organisations to meet the new standards, including cost-saving initiatives and processes to streamline compliance.

IMPORTANT

Whilst options are provided for CASA-approved RePL training organisations, it is highly recommended that the Chief Remote Pilot (CRP) or nominated CRI considers **all** information in this guide, including the relevant transition dates, and applies changes to their documented practices and procedures in accordance with the guidance in section 3.2 of this guide.

3.1 Background

The introduction of the CRI role aims to enhance the effectiveness and safety of RePL training courses. Prior to the latest MOS amendment, under paragraph 2.30 (2) (c) of the Part 101 MOS, the RePL training course instructor was required to have 1 or more of the following specific training qualifications:

- pilot instructor rating issued under Part 61 of CASR
- Certificate IV in Training and Assessment issued by an approved educational institution
- a tertiary level qualification in teaching that is recognised as such by a State or Territory government.

CASA recognised that the qualifications proposed for RePL training course instructors were not entirely suitable. Instead of mandating every instructor to hold specific training qualifications, CASA proposed that only the CRI should possess these qualifications. This change offers more flexibility for RePL training organisations and RePL training course instructors.

The CRI is a nominated personnel position for RePL training organisations and requires approval from CASA. Depending on the size of the training organisation, the nominated person may be the CRP or another suitably qualified person.

3.2 Do I need to transition and when?

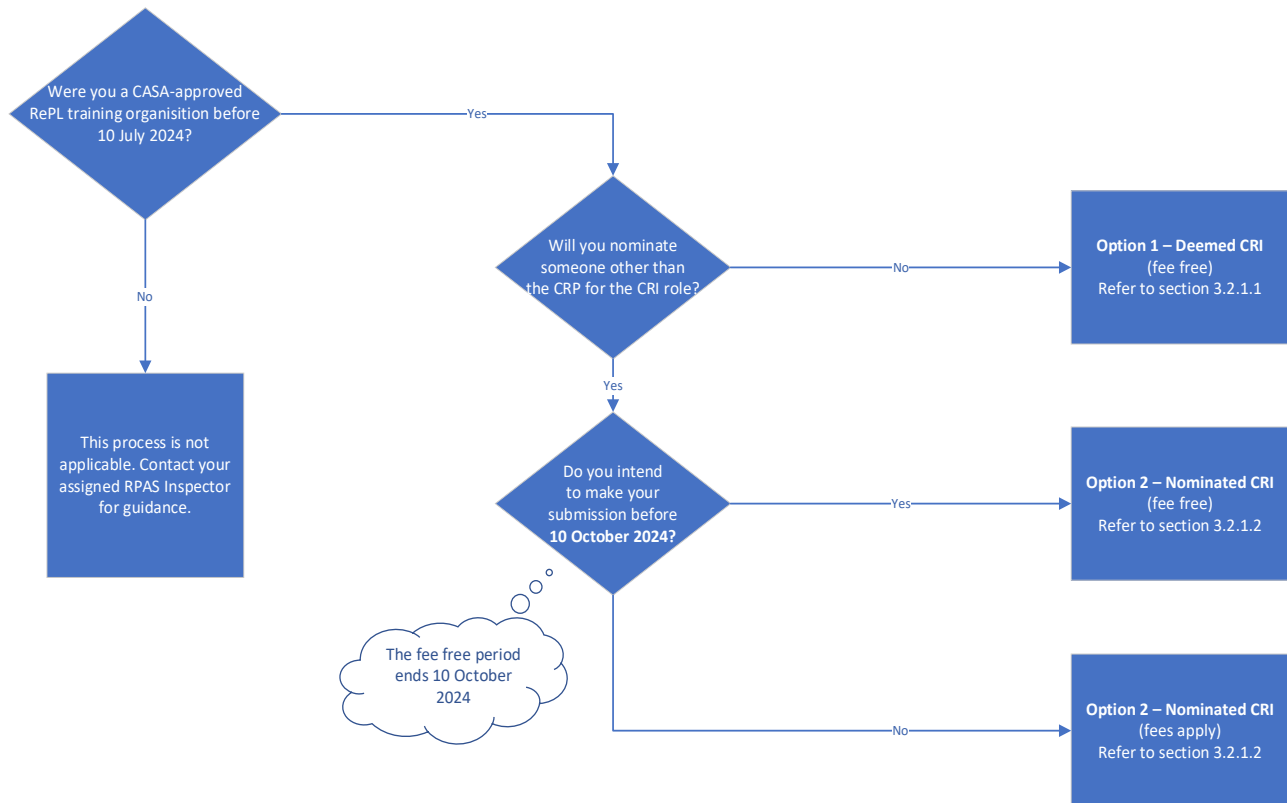
The transitional methodology and deeming provisions aim to minimise compliance burdens for RePL training organisations and to ensure that CASA can effectively allocate resources for assessing transitioning RePL training organisations.

On **10 July 2024**, the CRI position for all CASA-approved RePL training organisations will be automatically filled by the person who, on that day, holds the CRP position. CASA-approved RePL training organisations will need to select one of the 2 transition options as outlined in sections 3.2.1.1 and 3.2.1.2 of this guide.

3.2.1 Transition options

Figure 1 illustrates the transition options, important dates and fee waiver information for RePL training organisations.

Figure 1. Transition options, important dates and fee waiver



3.2.1.1 Deemed CRI (option 1)

If the CASA-approved RePL training organisation has no objections to the CRP filling the role of CRI, the organisation needs to ensure the following are in place by **10 January 2025**.

1. The CRP has the relevant RePL ratings, certificates, qualifications and experience requirements detailed in section 3.3.1 of this guide.
2. The organisation's documented practices and procedures, and supporting documents, are updated to reflect the addition of the CRI and change of responsibilities. Refer to the guidance in section 3.3.2 of this guide.
3. The relevant documentation specified in section 3.3.3 is submitted to CASA.

Note:

- For a deemed CRI, CASA considers the changes to documented practices and procedures a non-significant change. A non-significant change submission must be submitted to CASA prior to 10 January 2025.
- No assessment is conducted under option 1.
- If the deemed CRI does not meet the RePL ratings, certificates, qualifications and experience requirements by 10 January 2025, the RePL training organisation must cease all RePL training courses and must not recommence the training courses until the RePL training organisation has nominated a CRI that has been assessed and approved by CASA.

3.2.1.2 Nominated CRI (option 2)

If the CASA-approved RePL training organisation prefers a person other than the CRP to fulfil the role of CRI, the organisation can apply to CASA for the assessment of the CRI, which involves:

1. Submitting the [RPA Operator's Certificate \(ReOC\) Initial issue/variation/renewal](#) application form, evidence, updated documented practices and procedures and supporting documentation, as detailed in sections 3.3.1 to 3.3.3 of this guide.
2. CASA assessment of the supplied information and documentation, including any other additional information required from the training organisation.
3. The nominated CRI participating in an on-site assessment.

Note: Submissions for a nominated CRI should be made as soon as practically possible to reduce the risk of the training organisation having to self-suspend RePL training courses if the assessment process is not completed and approved prior to 10 January 2025.

3.2.2 When do I need to transition?**3.2.2.1 Fee waiver**

Under Option 1—Deemed CRI, there are no fees as the changes to documented practices and procedures and supporting documentation are deemed to be a non-significant change.

Under Option 2—Nominated CRI, if a RePL training organisation submits an application to nominate a CRI by 10 October 2024, CASA will not charge for the assessment (fee-free).

Any submission for a nominated CRI made after 10 October 2024 will be cost recoverable under the *Civil Aviation (Fees) Regulations 1995*.

3.2.2.2 Important dates

For **Option 1—Deemed CRI**, the relevant dates are:

- **10 Jul 2024:** CRP is automatically deemed as the CRI.
- **10 Jan 2025:** deadline for the deemed CRI to hold the RePL ratings, certificates, qualifications and experience requirements and for the RePL training organisation to submit a non-significant change form with attached updated documented practices, procedures and supporting documentation.

For **Option 2—Nominated CRI**, the relevant dates are:

- **10 Jul 2024:** CRP is automatically deemed the CRI, however an application for a nominated CRI (other than the CRP) can be submitted by the training organisation before this date.
- **10 Oct 2024:** final date for a fee-free application submission for the nominated CRI.
- **10 Jan 2025:** CRI must hold the RePL ratings, certificates, qualifications and experience requirements including documented practices, procedures and supporting documentation.

Note: If an application for the nominated CRI (Option 2) is not submitted by 10 October 2024, fees will be incurred by the applicant for assessment. Assessment of late submissions may not be complete and approved prior to 10 January 2025. If an application is submitted after 10 October 2024 and not approved by CASA by 10 January 2025, the RePL training organisation must cease all RePL training courses until a new CRI has been approved.

All CASA-approved RePL training organisations will receive correspondence on 10 July 2024 confirming the status of their training operations and transition options applicable to their operations.

3.3 What is required for transition?

Refer to sections 3.2.1.1 and 3.2.1.2 to determine applicability of the following content for your preferred transition option.

3.3.1 CRI ratings, certificates, qualifications and experience

This section applies to both deemed CRIs (option 1) and nominated CRIs (option 2).

As per section 3.2.1 of this guide, deemed CRIs will have until 10 January 2025 to meet the transition requirements. Nominated CRIs should have the relevant requirements prior to making an application to CASA for approval.

The requirements for the person are:

1. Holds a RePL for each type of RPA for which the RePL training organisation conducts training that also covers each make and model of the type.
2. Has one or more of the following qualifications (*relevant qualification*):
 - a. a pilot instructor rating issued under Part 61 of CASR
 - b. a Certificate IV in Training and Assessment issued by an approved educational institution
 - c. a tertiary level qualification in teaching that is recognised as such by a State or Territory government
 - d. other qualifications or experience equivalent to the rating, certificate or qualification mentioned above.
3. **If the CRI will also deliver the practical competency component of an RePL training course:**
 - a. satisfies the requirements in Section 2.30 of the Part 101 MOS, including at least 20 hours of non-training operational experience in RPA operations for a ReOC holder, in the same category of RPA.

Note:

- Unlike the CRP, the CRI must hold a RePL for each type of RPA for which the RePL training organisation conducts training, that also includes make and model of the type (e.g. if multirotor up to 25kg training is provided, the CRI must hold a RePL for multirotor 25kg). Similarly, with medium RPA, if the RePL training course provides training for DJI Agras T40 (MTOW up to 101kg), the CRI must hold a RePL for DJI Agras T40 (MTOW up to 101kg).
- If the CRI is not providing practical instruction as a RePL training course instructor, there is no requirement to hold 20 hours of non-training operational experience in RPA operations for a ReOC holder, in the same category of RPA. Category of RPA refers to aeroplane, helicopter (multirotor), helicopter (single rotor), or powered-lift.
- The nominated CRI, at the time of application, should hold the RePL ratings, certificates, qualifications and experience requirements detailed in this section. However, CASA may accept an application for a nominated CRI who does not hold the RePL ratings, certificates, qualifications and experience requirements at the time of application, but has provided CASA with a reasonable timeframe for obtaining them.

3.3.2 Documented practices and procedures

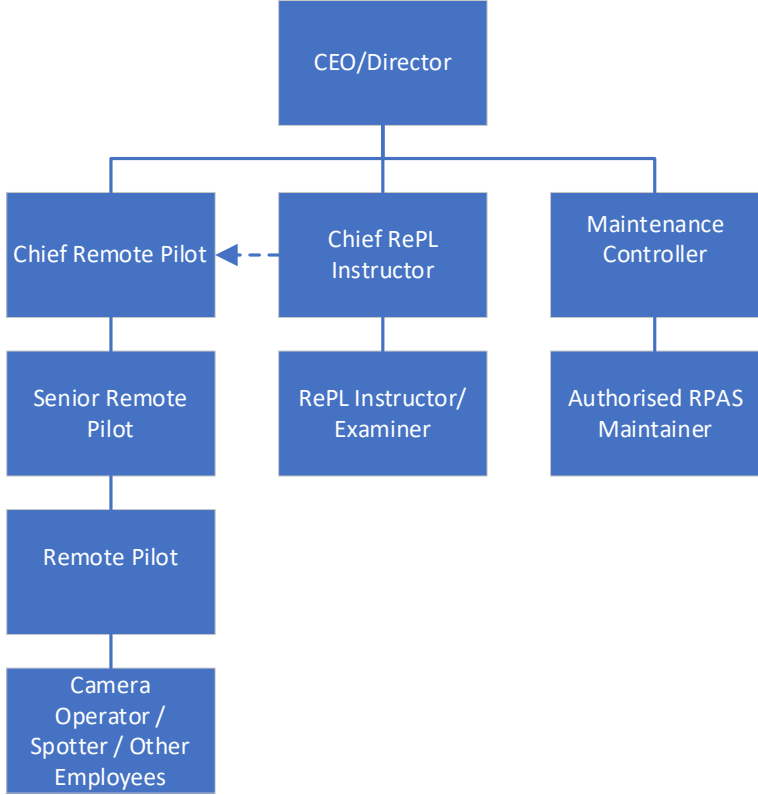
This section applies to both deemed CRIs (option 1) and nominated CRIs (option 2).

Table 1 outlines the changes required to the organisation's documented practices and procedures to ensure compliance with the new Part 101 MOS. As per section 3.2.2 of this guide, deemed CRIs have until 10 January 2025 to submit updated documented practices and procedures as a non-significant change; nominated CRIs will need to have documented practices and procedures updated by the time an application is made.

Note: As mentioned in section 2 of this guide, applicants for a RePL training organisation may utilise the guidance in this section to develop their documented practices and procedures.

Table 1. Guide for documented practices and procedures

Item	Details	MOS Ref.	Action required by RePL training organisations
1	All documents - administrative changes		Update version number and revision dates on all relevant pages including footers.
2	Operations Manual - revision log		Update the revision log to include the relevant changes. The version number and revision dates should match the number and dates on the rest of the document.

Item	Details	MOS Ref.	Action required by RePL training organisations
3	Operations Manual - organisation structure section	2.29B (5)	<p>Update the organisation structure to reflect the CRI position, which reports to the CRP and CEO.</p> <p>For example:</p> <p>Figure 2. Example organisation structure</p>  <pre> graph TD CEO[CEO/Director] --> CRP[Chief Remote Pilot] CEO --> CRI[Chief RePL Instructor] CEO --> MC[Maintenance Controller] CRP -.-> CRI CRP --> SRP[Senior Remote Pilot] CRI --> RE[RePL Instructor/ Examiner] MC --> ARPAS[Authorized RPAS Maintainer] SRP --> RP[Remote Pilot] RP --> CO[Camera Operator / Spotter / Other Employees] </pre>

Item	Details	MOS Ref.	Action required by RePL training organisations
4	Operations Manual - accountabilities and responsibilities section	2.29B	<p>Insert the following text into the accountabilities and responsibilities section:</p> <p>Responsibilities of Chief RePL Instructor (CRI) {ABC RPA}'s CRI is responsible for all operational matters in relation to RePL training. The roles and responsibilities of the {ABC RPA}'s CRI are to:</p> <ul style="list-style-type: none"> • ensure that the RePL training organisation complies with the civil aviation legislation relating to the conduct of each RePL training course and report to the CEO and CRP regularly to ensure ongoing compliance of the organisation • safely manage the conduct of each RePL training course • ensure that each RePL training course is conducted in a professional and systematic manner • assess and authorise the appointment of RePL instructors and examiners • monitor and maintain RePL training standards • supervise RePL instructors and examiners who work under the authority of the ReOC • maintain a record of ratings, qualifications, certificates and non-training operational experience held by each RePL instructor and examiner • ensure that there are sufficient numbers of RePL training instructors and appropriate RPA for each course, and that these are deployed and allocated to allow for competent and effective training of each applicant • maintain complete and up-to-date RePL training documents in accordance with section 10.03 of the Part 101 MOS • ensure an annual review of all RePL training documents is completed • set, monitor and maintain the organisation's standards for its RePL training courses • develop checklists and procedures relating to RePL training • establish, implement and manage the organisation's procedures to identify and rectify deficiencies in RePL training course training outcomes.
5	Operations Manual - RePL training section - definitions	1.04 (2), 2.29A	<p>Insert the following definition into the definitions table:</p> <p>Chief RePL Instructor means a Chief RePL Instructor for a RePL training organisation who satisfies the requirements of section 2.29A of the Part 101 MOS.</p>

Item	Details	MOS Ref.	Action required by RePL training organisations
6	Operations Manual - RePL training section - Chief RePL Instructor	2.29A, 2.29B, 2.30, 2.30A, 10.03	<div style="border: 1px solid red; padding: 10px; margin-bottom: 10px;"> <p>IMPORTANT</p> <p>RePL training organisations must ensure the text for this section is fit for purpose for their own documented practices and procedures. Do not copy and paste the wording into your manuals verbatim without considering other sections of your manuals and add information where required.</p> </div> <p>Create a new section in the Operations Manual - RePL training section and add the following text:</p> <div style="background-color: #e0f0ff; padding: 10px;"> <p>1.1 Chief RePL Instructor (CRI)</p> <p>An RePL training organisation must have a nominated person fill the role of Chief RePL Instructor. The CRI is the person responsible for the safe and effective management of the RePL training program.</p> <p>If the CRI role is vacated, all RePL training courses must cease until the RePL training organisation has nominated a new CRI and the nominated person is assessed and approved by CASA as a significant change.</p> <p>1.1.1 CRI instructor licencing and qualifications</p> <p>The CRI must meet the following requirements:</p> <ol style="list-style-type: none"> 1. Holds a RePL for each type of RPA (including make and model) for each training course provided under the ReOC. 2. Has one or more of the following qualifications: <ol style="list-style-type: none"> a. a pilot instructor rating issued under Part 61 of CASR b. a Certificate IV in Training and Assessment issued by an approved educational institution c. a tertiary level qualification in teaching that is recognised as such by a State or Territory government d. other qualifications or experience equivalent to the rating, certificate or qualification mentioned above. <p>1.1.2 CRI experience</p> <p>The CRI may also perform duties of a RePL training course instructor if they satisfy the requirements in section 2.30 of the Part 101 MOS. The CRI must have a minimum of <Insert minimum hours here, the number cannot be less than 20> logged hours of non-training operational experience in RPA operations under a ReOC, operating each of the RPAS categories for which they will be conducting practical RePL training.</p> </div>

Item	Details	MOS Ref.	Action required by RePL training organisations								
			<p>1.1.3 CRI record keeping The CRI must ensure all records specified in section 10.03A of the Part 101 MOS are kept for a period of 7 years.</p> <p>The CRI must also keep records that demonstrate they are performing their duties and discharging their responsibilities in accordance with section 2.29B of the Part 101 MOS.</p> <p>A summary of all CRI record keeping requirements are detailed in the table below.</p> <table border="1" data-bbox="707 515 1411 684"> <thead> <tr> <th>Type of record</th> <th>Minimum retention period</th> </tr> </thead> <tbody> <tr> <td>RePL training records as per Section 10.03A of the Part 101 MOS</td> <td>7 years after date on which the record was made</td> </tr> <tr> <td>Internal training</td> <td>7 years after date on which the record was made</td> </tr> <tr> <td>Audits and reporting</td> <td>7 years after date on which the record was made</td> </tr> </tbody> </table> <p>1.1.4 CRI internal training</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>Note: The sections below may already exist in your documented practices and procedures. However, they will generally refer to (for example) 'The RePL instructor must have completed induction training'; as opposed to the intent of the new CRI's responsibility: 'the CRI must ensure that all RePL instructors have completed induction training found at Appendix <insert relevant Appendix here>. Therefore, you do not need to copy this text verbatim into your manuals; rather, amend the relevant section to reflect the CRI's responsibility.</p> </div> <p>1.1.4.1 Initial training The CRI must ensure that all RePL instructors and examiners have completed induction training and assessment to understand their roles, task requirements and responsibilities.</p> <p>The RePL instructor must demonstrate, to the CRI, a minimum of <Insert number of lessons> lessons containing aeronautical knowledge units and <Insert number of lessons> lessons containing practical competency units, prior to being approved as a RePL Instructor. <i>[delete or amend relevant text if aeronautical knowledge units or practical competency units are not delivered as part of the RePL training courses]</i></p>	Type of record	Minimum retention period	RePL training records as per Section 10.03A of the Part 101 MOS	7 years after date on which the record was made	Internal training	7 years after date on which the record was made	Audits and reporting	7 years after date on which the record was made
Type of record	Minimum retention period										
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Internal training	7 years after date on which the record was made										
Audits and reporting	7 years after date on which the record was made										

Item	Details	MOS Ref.	Action required by RePL training organisations
			<p>The examiner must demonstrate, to the CRI, an understanding of the examiner's roles, responsibilities and conduct described in this manual and at least 1 in-person example of:</p> <ul style="list-style-type: none"> • an aeronautical knowledge examination review, including providing a knowledge deficiency report (KDR) • a flight test review. <p>The training syllabus and checklist can be found in Appendix <insert relevant Appendix here>.</p> <p>The CRI must retain a record of initial training for a period of 7 years.</p> <p>1.1.4.2 Recency training The CRI must ensure RePL instructors have: <i>[delete as required]</i></p> <ol style="list-style-type: none"> 1. Delivered a minimum of <Insert number of lessons> lessons containing aeronautical knowledge units in the previous <Insert minimum number of months here> months. 2. Delivered a minimum of <Insert number of lessons> lessons containing practical competency in the previous <Insert minimum number of months here> months. <p>The CRI must ensure examiners have: <i>[delete as required]</i></p> <ol style="list-style-type: none"> 1. Assessed a minimum of 1 aeronautical knowledge examination (including remedying KDRs) in the previous <Insert minimum number of months here> months. 2. Assessed a minimum of 1 flight test in the previous <Insert minimum number of months here> months. <p>If an RePL instructor or examiner does not satisfy any of the relevant requirements, the CRI must ensure that person undergoes currency training as per section <insert relevant section here> for each item, and deemed satisfactory before returning to their role.</p> <p>The recency checklist can be found in Appendix <insert relevant Appendix here>.</p> <p>The CRI must retain a record of recency checks for a period of 7 years.</p> <p>1.1.4.3 Currency training All RePL instructors must have been assessed by the CRI; conducting 1 lesson containing aeronautical knowledge units and 1 lesson containing a practical competency unit in the previous 12 months.</p>

Item	Details	MOS Ref.	Action required by RePL training organisations
			<p>All examiners must have been assessed by the CRI as to the understanding of the examiner's roles, responsibilities and conduct described in this manual, and demonstrate at least 1 in-person example in the previous 12 months of:</p> <ul style="list-style-type: none"> • an aeronautical knowledge examination review, including providing a knowledge deficiency report (KDR) • a flight test review. <p>The currency checklist can be found in Appendix <insert relevant Appendix here>.</p> <p>The CRI must retain a record of currency checks for a period of 7 years.</p> <p>1.1.4.4 Ad-hoc training If the CRI is made aware of deficiencies in the standards provided by RePL instructors or examiners, the CRI must ensure that person undergoes currency training as per section <insert relevant section here> for each item, and deemed satisfactory before returning to their role.</p> <p>1.1.5 CRI internal audit and reporting The CRI must conduct an audit and report to the CRP and CEO about the findings of each planned or ad-hoc audit mentioned in this section every <Insert minimum number of months here, the number cannot be more than 12 months> months.</p> <p>If the CRI reports any deficiencies, the CEO, CRP and CRI must conduct a review and implement changes to ensure the safe and effective delivery of RePL training courses.</p> <p>The CRI must retain a record of each audit in this section for a period of 7 years.</p> <p>The audit checklist for this section can be found in Appendix <insert relevant Appendix here>.</p> <p>1.1.5.1 Operations manual and regulatory compliance The CRI will conduct a compliance audit on a representative sample of processes and procedures. At a minimum, the audit must assess:</p> <ul style="list-style-type: none"> • compliance with current CASA legislation • accessibility and awareness of the current operations manual by all personnel • accuracy and completeness of RePL training records.

Item	Details	MOS Ref.	Action required by RePL training organisations
			<p>1.1.5.2 Operational effectiveness The CRI must ensure there is a sufficient amount of RePL training instructors, examiners and appropriate RPA to facilitate competent and effective training for each student in every RePL training course.</p>
7	Operations Manual - RePL training section - all instances	Chapter 2 and section 10.03A	Replace all instances of 'Chief Remote Pilot' or 'CRP' with 'CRI' (applicable to the RePL training section only).
8	Operations Manual - RePL training section - RePL instructor qualifications	2.30 (2)	<p>There is no longer a requirement for RePL training course instructors to hold a pilot instructor rating, Certificate IV in training and assessment, or a tertiary level qualification in teaching.</p> <p>RePL training organisations can choose to retain this requirement or delete it.</p> <div style="border: 1px solid black; padding: 5px;"> <p>Note: RePL training organisations that are required by CASA to specify qualifications for RePL training course instructors should not amend this section.</p> </div>
9	Operations Manual - RePL training section - all		Review the entire RePL training section and amend or delete any references that are contrary to the responsibilities and accountabilities of the CRI.
10	Other supporting documentation		Replace all instances of 'Chief Remote Pilot' or 'CRP' with 'CRI' in your supporting documentation (e.g. lesson plans and instructor handbooks).

3.3.3 Submission requirements

3.3.3.1 Deemed CRI (option 1)

For deemed CRIs (option 1), CASA-approved RePL training organisations must submit the following to rpas.pac@casa.gov.au by no later than 10 January 2025.

1. Updated documented practices and procedures.
2. Completed [RPA Operator's Certificate \(ReOC\) - Significant Change approval and/or Notification of Non-Significant Changes](#) form – indicating a **non-significant change to include the CRI role**.

3.3.3.2 Nominated CRI (option 2)

For nominated CRIs (option 2), CASA-approved RePL training organisations must submit the following (for a fee-free submission) to rpas.pac@casa.gov.au by no later than 10 October 2024.

1. Updated documented practices and procedures.
2. Completed [RPA Operator's Certificate \(ReOC\) - Initial issue / variation / renewal](#) form.
3. A copy of 1 of the following relevant qualifications:
 - a. a pilot instructor rating issued under Part 61 of CASR
 - b. a Certificate IV in Training and Assessment issued by an approved educational institution
 - c. a tertiary level qualification in teaching that is recognised as such by a State or Territory government
 - d. other qualifications or experience equivalent to the rating, certificate or qualification mentioned above.
4. If the nominated CRI also intends on being a RePL training course instructor, a copy of their logbook that shows 20 hours of non-training operational experience in RPA operations for a ReOC holder, in the same category of RPA.

Note:

- Evidence of a relevant qualification or logbook does not need to be certified.
- As a reminder, category of RPA refers to aeroplane, helicopter (multirotor), helicopter (single rotor), or powered-lift.

3.4 CRI assessment process

As mentioned in subsection 3.2.1.1, deemed CRIs (option 1) will not undergo an assessment. However, the organisation will need to ensure their documented practices and procedures are compliant with the requirements in the Part 101 MOS. Surveillance events will assist in rectifying any deficiencies.

For nominated CRIs (option 2), the assessment process is outlined below:

1. CASA will review the updated documented practices and procedures, evidence of relevant qualifications, and logbook and other information submitted with the application, and provide feedback where required.
2. CASA and the RePL training organisation will work through feedback until satisfactory.
3. CASA will liaise with the nominated CRI to arrange a suitable date, time and place for the on-site assessment. CASA will also request additional training material at this time. The onsite assessment will involve the CRI demonstrating to CASA:
 - a. 1 theoretical lesson (if applicable)
 - b. 1 practical lesson (if applicable)
 - c. 1 flight test (if applicable).

Note: If the on-site assessment is deemed unsatisfactory, steps 1 to 3 must be repeated.

4. On satisfactory completion of the on-site assessment, the transition will be finalised pending any other outstanding amendments.

Appendix A Frequently asked questions (FAQ)

What if a CRI is nominated after 10 October 2024?

The RePL training organisation will be charged for the assessment and may be required to cease delivery of their RePL training courses if the nominated CRI is not assessed by CASA and approved prior to 10 January 2025. However, the submission requirements will remain the same.

Why must CRIs of a CASA-approved RePL training organisation hold the RePL ratings, certificates and qualifications by 10 January 2025?

The CRI standards outlined in the Part 101 MOS Amendment Instrument take effect on 10 July 2024. However, CASA-approved RePL training organisations were granted a transition period to ensure their operations can continue with minimal impact whilst the CRI makes arrangements to satisfy the MOS requirements (if required). The transitional provisions in section 2.29C of the Part 101 MOS cease on 10 January 2025.

What if a ReOC variation to add or remove RePL training privileges is applied for during this transition period (up to 10 January 2025)?

The fee waiver is only applicable to organisations that can satisfy the requirements in this guide. Any ReOC variation will incur fees and require the organisation to submit [RPA Operator's Certificate \(ReOC\) - Initial issue / variation / renewal](#) and updated documented practices and procedures to CASA.

Additional requirements may apply.

For deemed CRIs, if the ReOC variation is to:

- remove RePL training privilege(s) – there are no additional requirements on the CRI outside of the requirements specified in this guide
- add additional RePL training privilege(s) – by 10 January 2025, the CRI should ensure their RePL rating, certificate, qualifications or experience are updated to the account for the new training privilege(s).

For nominated CRIs, they must ensure their RePL rating, certificate, qualifications or experience are already updated at the time of the ReOC variation application.

I have multiple documents that exceed the email size attachment limits. How do I send the documents to CASA?

Contact rpas.pac@casa.gov.au and request a CASA Sharefile.

What if the deemed CRI has resigned during this transition?

The RePL training organisation will need to nominate a suitable CRI. If a submission is made prior to 10 October 2024, there will be no fees charged for the assessment. If the CRI resigns and a suitable CRI has not been assessed and approved by CASA by 10 January 2025, the RePL training organisation will need to cease all RePL training courses until such time as the CRI has been approved.

What happens if the CRI is on leave?

RePL training courses may continue, however, as the CRI is required to sign and date the certificate of completion, successful students from a RePL training course will not be issued a RePL until such time as the CRI returns, signs and dates the certificate of completion and the RePL training organisation notifies CASA – either via the myCASA portal or [Application for Remote Pilot Licence \(RePL\) and Training Notification of Results](#).

What happens if the CRI position is vacated?

All RePL training courses must cease until CASA has assessed and approved a suitable CRI replacement. Unfortunately, any students that are still enrolled in a RePL training course will be affected and their training unable to continue until a new CRI is appointed.