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**Australian Government**  
**Civil Aviation Safety Authority**

**ANNEX C TO MULTI-PART AC 119-11  
AND AC 138-02 V6.0**

**Transitional recognition of past  
training and checking events –  
Part 133, 135 and 138 operators**

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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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# 1 Overview

## 1.1 Purpose of this Annex

The purpose of this Annex is to provide specific guidance relating to:

- Part 133 training and checking activities
- Part 135 training and checking activities
- Part 138 training and checking activities.

It is intended that this information complements the general information available in Chapter 5 of Multi-Part AC 119-11 and AC 138-02 Training and checking systems.

It is recommended that Multi-Part AC document is read first, before reading this Annex.

## 1.2 Relevance of this Annex

Information contained in this Annex relates to the following operators and crew members:

- operators who elect to defer carrying out training and checking in accordance with CASA EX87/21 and its successor CASA EX73/24
- crew members who are released for unsupervised air transport or aerial work operations for the operator as of 28 February 2025.

This Annex does not provide information in relation to:

- operators who have commenced use of their training and checking system prior to 28 February 2025
- crew members who are not released for unsupervised air transport or aerial work operations for the operator as of 28 February 2025.

## 2 Future Training and Checking requirements for Part 119 and 138 operators

### 2.1 Implications of the end of exemptions

Operators may be taking advantage of the relief granted by exemption instrument CASA EX87/21 (and its successor CASA EX73/24) to defer the introduction of a training and checking system and compliance with the new training and checking requirements in each respective MOS.

CASA has published the end of 28 February 2025 as the time when the exemption instrument ceases to have effect. CASA has published transitional instruments which mean operators do not have to carry out all the training and checking events required by the new rules for existing crew members by the end of this date if they choose not to.

### 2.2 Transitional instruments and their practical effect

The transitional instruments for Parts 133<sup>1</sup>, 135<sup>2</sup> and 138<sup>3</sup> allow operators to defer conduct of the training and checking events, required by the new rules, until after the end of 28 February 2025 only for those crew members on-line with the operator on this date.

The concept is that crew members released for unsupervised operations with an operator have already completed training and checking events under previous legislation and CASA considers that the completion of these previous events within certain timeframes sufficiently assures the maintenance of an acceptable level of safety regarding the competence of the crew members for the periods outlined in the exemption instruments.

The instruments operate by exempting operators and their crew members from the need to conduct certain new events required under the flight operations regulations (FOR) This allows operators to optionally reschedule completion of the relevant training and checking events to ease resource limitations on or around 28 February 2025 and to preserve the naturally random scattering of check dates across the industry.

### 2.3 Crew members who were not previously required to complete certain training and checks

Some crew members released for unsupervised duty for operators on 28 February 2025 may not have completed a previous training or checking event that could be considered equivalent to the new event they may be required to carry out in the future. This could be since the previous legislation did not require the completion of an analogous training or checking event. In addition, some new crew member classifications which did not exist prior to December 2021 were introduced by the FOR.

For these crew members, CASA considers that carrying out an unsupervised air transport or aerial work operation for the operator within the 12 months prior to 28 February 2025 demonstrates competence in the

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<sup>1</sup> CASA EX77/24- Transitional Training and Checking Requirements for Crew Members in Part 133 Operations - Exemption Instrument 2024.

<sup>2</sup> CASA EX78/24- Transitional Training and Checking Requirements for Crew Members in Part 135 Operations - Exemption Instrument 2024.

<sup>3</sup> CASA EX79/24- Transitional Training and Checking Requirements for Crew Members in Part 138 Operations - Exemption Instrument 2024.

operation. This means that for these crew members, relief is provided by the instruments for the period mentioned in the instrument for the crew member and the circumstance.

The following table outlines the crew member for the particular operator, summarises the effect of the exemption instruments, and mentions the flight that must have been carried out, for these circumstances.

**Table 1: Part 133 operators**

Crew member	Exempted from	Previous event
Flight crew members not required to pass the CAO 20.11 test.	Annual general emergency training and check of competency.	Conduct of at least 1 unsupervised air transport or medical transport operation (as applicable) for the operator and the rotorcraft after 28 February 2024 but before 28 February 2025.
Air crew members, cabin crew members and medical transport specialists not required to pass the CAO 20.11 test.	Annual general emergency training and check of competency.	
Air crew members, cabin crew members and medical transport specialists.	Conversion and recurrent training and checking (proficiency check) Line training and line check.	

**Table 2: Part 135 operators**

Crew member	Exempted from	Previous event
Flight crew members not required to pass the CAO 20.11 test.	Annual general emergency training and check of competency.	Conduct of at least 1 unsupervised non-scheduled air transport or medical transport operation (as applicable) for the operator and the aeroplane after 28 February 2024 but before 28 February 2025.
Air crew members and medical transport specialists not required to pass the CAO 20.11 test.	Annual general emergency training and check of competency.	
Air crew members and medical transport specialists.	Conversion and recurrent training and checking (proficiency check) Line training and line check.	

**Table 3: Part 138 operators**

Crew member	Exempted from	Previous event
Flight crew members not required to pass the CAO 20.11 test.	Annual general emergency training and check of competency.	Conduct of at least 1 unsupervised aerial work operation for the operator and the aircraft after 28 February 2024 but before 28 February 2025.
Air crew members not required to pass the CAO 20.11 test.	Annual general emergency training and check of competency.	
Air crew members.	Conversion and recurrent training and checking (proficiency check).	

### 2.3.1 Crew members who were required to complete previous checks or tests

Under previous legislation, crew members were required to have completed certain checks as required by Part 61 of CASR and CAO 20.11 for the operator. The following table provides a summary of these old events that are considered to provide sufficient safety assurance in relation to the corresponding new events.

**Table 4: Old events versus new events**

Old event considered sufficient	Corresponding new event
CAO 20.11 Emergency Procedures Proficiency Test	General Emergency Training and Check of Competency
Flight Review	Flight Crew Member conversion training and proficiency check (VFR flights)
Instrument Proficiency Check	Flight Crew Member conversion training and proficiency check (IFR flights)

### 2.3.2 Length of exemptions

The periods of time that the exemptions allow vary with the nature of the old event that has been completed, and the new event that is required to be completed.

#### General emergency training and check of competency

The emergency procedures proficiency test specified in Appendix 12 of CAO 20.11 is considered to provide sufficient assurance of continued operational safety instead of immediately completing the General Emergency Check of Competency. If the crew member's CAO 20.11 test is valid on 28 February 2025, the training is not required to be completed again. This recognition of the CAO 20.11 test has effect until the expiry of the crew members current CAO 20.11 check, (12-month validity period), or 12 months after 28 February 2025, whichever is earlier.

If the crew members' CAO 20.11 test required life raft usage or underwater escape (which have 3-yearly validity), these elements of the CAO 20.11 test are considered to provide sufficient assurance of continued operational safety instead of immediately completing the General Emergency Check of Competency in the same elements until the expiry of the crew members current CAO 20.11 test (3-year validity), or 3 years after 28 February 2025, whichever is earlier.

**Note:** Crew members not employed by the operator before 28 February 2025, or who were employed before 28 February 2025 but had not yet completed a CAO 20.11 test for the operator, will have to complete the new general emergency training and check of competency prior to commencing unsupervised air transport or aerial work operations.

#### Conversion training

If a crew member is released for unsupervised duty for the operator as of 28 February 2025, conversion training is not required.

#### Flight crew member proficiency check – VFR flights

A completed flight review that meets Part 61 requirements<sup>4</sup> is considered to provide sufficient assurance of continued operational safety for VFR operations instead of immediately completing a flight crew member proficiency check until the expiry of the crew members' flight review (2-year validity period), or 15 months after completion of the flight review, whichever is earlier.

<sup>4</sup> Regulations 61.745 or 61.800 of CASR

## Flight crew member proficiency check – IFR flights

A completed Instrument Proficiency Check (IPC) that meets the Part 61 requirements<sup>5</sup> of CASR is considered to provide sufficient assurance of continued operational safety for IFR operations instead of immediately completing a flight crew member proficiency check until the IPC expires, or 12 months after 28 February 2025, whichever is earlier.

## Flight crew member, air crew member, cabin crew member and medical transport specialist line training and line check

If a crew member carries out an unsupervised air transport, medical transport or aerial work flight for the operator between 28 February 2024 and 28 February 2025 this is considered to provide sufficient assurance of continued operational safety in relation to the requirements for line training and line checks on a permanent basis. Therefore, the recognition for this circumstances has no expiry date whilst the crew member is on-line with the operator.

## 2.4 Suggested processes to take advantage of the transitional exemption instruments

### 2.4.1 Records management

Operators are free to use any records management system they choose. However, a key component of this system must be the tracking of the expiry dates of training and checking events for the crew member, and ideally, an alerting mechanism to provide the operator with sufficient warning about when to schedule a training or checking event. The responsibility for managing this system rests with the HOFO/HOO, regardless of how the system operates in practice.

### 2.4.2 Example 1 - General emergency training and check of competency - Part 133

A pilot for a Part 133 operator who flies rotorcraft on over-water flights completed their CAO 20.11 check on 1 June 2024 (they are not required to use life-rafts) with the Head of Operations. They were active as a pilot for the operator in February 2025. They will require flight crew member annual general emergency training and a check of competency for the aircraft they fly and for the operator under the new regulations at some stage in the future.

#### Notes:

1. Under previous legislation, an emergency procedures proficiency test was required for a pilot of an aircraft engaged in charter or regular public transport operations (see subsection 12 of CAO 20.11).
2. Under the FOR, a pilot may only carry out an air transport operation for an operator if they have completed the general emergency training and a flight crew member general emergency check of competency (see r133.370 (2) (f) and (4), and 12.03 (b) and 12.04 of the Part 133 MOS).

The HOTC reviews CASA EX77/24 item 1 and notes the following:

- The new event/s required are the flight crew member annual general emergency training and check of competency (column 1).

<sup>5</sup> Regulation 61.880 of CASR.



- The previous event the operator can consider to be a substitute for these 2 events is the completion an emergency procedures proficiency test as mentioned in subsection 12 of CAO 20.11 that was valid for the aeroplane immediately before 28 February 2025 (column 4).
- The new events that the exemption gives relief from are (column 5):
  - The general emergency training mentioned in 12.04 of the Part 133 MOS.
  - The general emergency check of competency [12.03 (a) of the Part 133 MOS].
- Column 6 states that the relief from the requirement to carry out the general emergency training (12.04 (b) of the MOS) does not expire. This means that this crew member does not have to complete this training again for this operator.
- Column 6 then states when the relief from the general emergency check of competency expires. It relates to when the last 20.11 check was completed and allows a time frame of the earlier of the date the 20.11 check expires, or 1 year.
- In this pilot’s case, since the last CAO 20.11 check was completed on 1 June 2024 (which would still have been valid on 28 February 2024 since it is valid for 1 year) the operator reviews sub-para (2) of column 6 and determines that:

The crew member will be required to complete the new flight crew member general emergency training and check of competency by 1 June 2025.

- Notes:**
1. If the pilot was not previously required to complete the CAO 20.11 emergency procedures proficiency test prior to 2 December 2021, this circumstance is mentioned in item 2 of Table 1. They will be required to complete it by the dates specified in Column 6 of this item.
  2. The same relief provisions apply to Part 135 operators and their pilots.

### 2.4.3 Example 2 - Flight crew member proficiency check - VFR flights - Part 135 operator

A pilot for a Part 135 operator in rural Victoria who flies DH82 aircraft on VFR scenic flights, carried out a flight review on 1 June 2024 in a C172 with a Part 141 operator at Moorabbin. They were active as a pilot for the operator in February 2025. They will require a flight crew member proficiency check for the DH82 and the operator under the new regulations at some stage in the future.

- Notes:**
1. Under previous legislation, a flight review for the class was required for a pilot to be able to exercise the privileges of their licence in any aeroplane of that class – in this case single-engine class (see r61.745 of CASR).
  2. Under the FOR, a pilot may only carry out an air transport operation for an operator if they have completed a flight crew member proficiency check for *the flight* (see r 135.380 (2) (f) and (4), and 12.03 (b) and 12.05 of the Part 135 MOS).
  3. In the case of this flight crew member and operator, *the flight* means the pilot’s competence needs to be assessed by a proficiency check during a flight representative of the duties they will be assigned to for the operator, in this case scenic flights in a DH82 at the rural location (see r135.385 of CASR).

The HOTC reviews CASA EX78/24 item 3 and notes the following:

- The new event/s required are the flight crew member conversion training and flight crew member proficiency check (column 1).
- The previous event the operator can consider to be a substitute for these two events for a VFR flight is the completion of a flight review that was valid for the aeroplane immediately before 28 February 2025 (column 4).
- The new events that the exemption gives relief from are (column 5);
  - The conversion training and flight crew member proficiency check (12.03 (b) of the Part 135 MOS)
  - Being assessed as competent for the assigned duty (135.385 (1) of CASR)
  - Completing a proficiency check for operations from the non-command seat (135 405 (1) and (2))
- Column 6 states that the relief from the conversion training requirement (part of 12.03 (b) of the MOS) does not expire. This means that this crew member does not have to complete conversion training again for this operator.
- Column 6 then gives a spread of dates when the relief from the flight crew member proficiency check expires. It relates to when the last flight review was completed by the pilot.
- In this pilot's case, since the last flight review was completed on 1 June 2024 (which would still have been valid on 28 February 2024 since it is valid for 2 years) the operator reviews sub-para (2) of column 6 and determines that:

The crew member will be required to complete the new flight crew member proficiency check by 28 August 2025.

**Note:** This new flight crew member proficiency check must be completed in an aeroplane type similar to the type the crew member will be assigned to. In this instance the DH82 or similar. Refer to Annex B of this AC.

### 2.4.4 Example 3 Flight crew member proficiency check - IFR flights - Part 135

A pilot for a Part 135 operator in Kununurra who flies PA31 aircraft on IFR air transport flights, carried out an IPC on 1 June 2024 in a BE76 with a Part 61 Flight Examiner in Perth. They were active as a pilot for the operator in February 2025. They will require a flight crew member proficiency check for the PA31 and the operator under the new regulations at some stage in the future.

**Notes:**

1. Under previous legislation, an IPC for the category was required for a pilot to be able to exercise the privileges of their licence in any aeroplane of that category, however the IPC needs to be completed in a multi-engine class aircraft (see r61.880 of CASR).
2. Under the FOR, a pilot may only carry out an air transport operation for an operator if they have completed a flight crew member proficiency check for the flight (see r 135.380 (2) (f) and (4), and 12.03 (b) and 12.05 of the Part 135 MOS).
3. In the case of this flight crew member and operator, the flight means the pilot's competence needs to be assessed by a proficiency check during a flight representative of the duties they will be assigned to for the operator, in this case IFR air transport flights in a PA31 (see r135.385 of CASR).

The HOTC reviews CASA EX78/24 item 3 and notes the following:

- The new event/s required are the flight crew member conversion training and flight crew member proficiency check (column 1).
- The previous event the operator can consider to be a substitute for these two events for an IFR flight is the completion of an IPC that was valid for the aeroplane immediately before 28 February 2025 (column 4).
- The new events that the exemption gives relief from are (column 5):
  - The conversion training and flight crew member proficiency check (12.03 (b) of the Part 135 MOS)
  - Being assessed as competent for the assigned duty (135.385 (1) of CASR)
  - Completing a proficiency check for operations from the non-command seat (135 405 (1) and (2))
- Column 6 states that the relief from the conversion training requirement (part of 12.03 (b) of the MOS) does not expire. This means that this crew member does not have to complete conversion training again for this operator.
- Column 6 allows relief from the new flight crew member proficiency check until the earlier of one year from 28 February 2025, or when the pilot's IPC expires.
- In this pilot's case, since the IPC was completed on 1 June 2024 (which would still have been valid on 28 February 2024 since it is valid for 1 year) the operator reviews sub-para (2) of column 6 and determines that:

The crew member requires the new flight crew member proficiency check by 1 June 2025.

**Note:** This new flight crew member proficiency check must be carried out in an aeroplane type similar to the type the crew member will be assigned to. In this instance a PA31. Refer to Annex B of the AC.

## 2.4.5 Example 4 - Flight crew member line training and line check - Part 135

A pilot for a Part 135 operator in Darwin flies a C210 on IFR air transport flights and carried out a flight for the operator on 1 June 2024. They were active as a pilot for the operator in February 2025. The new regulations require them to complete line training and a line check for the operator.

The HOTC reviews CASA EX78/24 item 3 and notes the following:

- The new event/s required are the flight crew member line training and line check (column 1).
- The previous event the operator can consider to be a substitute for these two events is the conduct of at least 1 unsupervised flight that is an air transport operation for the operator and the aeroplane after 28 February 2024 but before the critical date (column 4).
- The new events that the exemption gives relief from are (column 5);
  - The line training and line check (12.03 (c) of the Part 135 MOS)
  - Being assessed as competent for the assigned duty (135.385 (1) of CASR)
- Column 6 states that the relief from the line training and line check requirement does not expire. This means that this crew member does not have to complete line training and a line check for this operator.

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- In this pilot's case, since the relevant unsupervised flight was conducted on 1 June 2024 (which meets the requirements of column 4) the operator reviews column 6 and determines that:

The crew member is not required to complete the new line training and line check whilst they remain on-line with the operator.