



PROTOCOL

(OPS.137) Aerial application operations - other than rotorcraft

December 2025



Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and the places to which we travel for work. We also acknowledge the Traditional Custodians' continuing connection to land, water and community. We pay our respects to Elders, past and present.

Artwork: James Baban.

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1. Purpose

This protocol is for the assessment of an AOC for operations under Part 137 of the *Civil Aviation Safety Regulations 1998* (CASR). This protocol is for the assessment of an initial application for an aerial application AOC or a variation to an existing aerial application AOC. The protocol has been designed to work in conjunction with other protocols for specific approvals. This protocol enables standardisation of the assessment process.

The Protocol will also be used for the ongoing surveillance of an aerial application operator.

2. Concept and philosophy

An AOC issued under section 28 of the Civil Aviation Act 1988 (the Act) for the purposes of Part 137 of CASR differs from Part 138 aerial work operations in that it is restricted to an aerial application operation conducted in an aeroplane. An aerial application operation (or application operation) means:

- a. flight that is carried out by an aeroplane to apply application material; and
- b. a flight by an aeroplane that is for, or partly for, 1 or more of the following:
 - i. inspection of a work area
 - ii. pilot training or checking relating to an aerial application operation
 - iii. training of a crew member other than the pilot
 - iv. travel from a landing area to a work area and back
 - v. the carriage of a passenger specified in regulation 137.135 for a purpose set out in that regulation; and
- c. preparation for any activities mentioned in paragraphs (a) and (b).

The elements required to be assessed for a Part 137 AOC application will depend on the size, nature and complexity of operations and involve verification of the applicant's claims through a range of activities, including:

- desktop assessments of the documentation provided;
- site inspection of facilities;
- assessment of key personnel;
- demonstration flights (where required).

An initial application for an AOC will involve several inspectors from different disciplines forming a project team, whereas a variation to an existing AOC may consist of only one inspector depending on the application.

Before the issue of an AOC for an initial applicant, or the issue of the new AOC to an applicant which is for a variation to an existing AOC can be recommended, the project team will verify the application meets the requirements for the proposed operation.

Where the application is for a variation that is not covered by a separate approval protocol, the inspector should complete the sections of the (OPS.137) worksheet appropriate to the application. The inspector must detail the scope of the assessment on the worksheet.

3. Process

All administration tasks should follow standard regulatory service administration procedures (as applicable), in addition to the following:

- a. if required, CASA will facilitate a pre-application meeting (see section 3.1 of this protocol);
- b. For an initial issue or variation for Part 137 AOC's, operators will submit the AOC aerial application operator's Part 137 form (CASA-04-5643) to CASA for an approval under regulation 137.015 of CASR;

- c. Regservices will create a case in EAP to be assigned to a CASA inspector as either the project manager or the assessor, depending on the application;
- d. Regservices and the inspector should confirm that an EAP stop alert is not active;
- e. If required, the project manager will review the application and form a project team to conduct the assessment;
- f. All associated CASA staff must be knowledgeable of, and competent with, Principle (OPS.137), which provides details for the assessment of an initial issue AOC, or a new AOC which is a variation to an existing AOC;
- g. The relevant sections (determined by scope) of Worksheet (OPS.137) must be completed by the CASA inspector and saved as a PDF document in RMS, including:
 - i. the assessment summary
 - ii. the approval data sheet.
- h. If the application involves additional approvals, the inspector must complete the relevant section on the approval data sheet and provide the revision details for the operations manual;
- i. The inspector must complete EAP in accordance with the EAP OAS Case Management - Regulatory Oversight Division (ROD) handbook (CASA-03-5501).

The assessment must be endorsed by an independent person, see section 3.1 of this Protocol.

3.1 Application to conduct flight training

This section applies in relation to an operator who, for the previous 3 or more years:

- held an AOC authorising the person to undertake aerial application operations in an aeroplane and
- had an operations manual containing procedures for aeroplane firefighting operations and
- had annually conducted aeroplane firefighting operations under the written authorisation of the National Aerial Firefighting Centre or of a State or Territory fire control authority.

If an operator, who meets the above requirements, wishes to exercise the approval provided by instruments CASA 31/23 or CASA 56/24 they must submit a variation request using AOC aerial application operator's Part 137 form (CASA-04-5643) to CASA for an approval under regulation 137.015 of CASR with the following information:

- for question 8 select the 'Other Amendments to the Operations Manual' check box
- for question 30 provide a summary of the changes made and the associated sections/pages of the operations manual where the updates have been entered

3.2 Recommendation endorsement

All recommendations must be endorsed by a separate person, normally the Manager Regulatory Services, prior to the delegate issuing the authorisation.

The Manager Regulatory Services may assign the endorsement to another inspector.

The role of the endorser is to:

- ensure all sections of the worksheets been completed;
- the assessment summary page has been completed;
- the approval data sheet has been completed;
- all worksheets and relevant documents have been filed in RMS;

- the "Assessment" section of EAP has been fulfilled;
- the "Create recommendation" section of EAP has been fulfilled.

If satisfied the endorser will complete the "Endorse recommendation" section of EAP and forward the task to the delegate.

If the assessing inspector holds the delegation for the authorisation, they can issue the authorisation.

3.3 Pre-application meeting

A pre-application meeting is conducted by CASA to help the applicant understand the certification process and the requirements to obtain an AOC.

The applicant may also request a pre-application meeting with CASA through Regservices.

A pre-application meeting is recommended for the initial issue of any AOC and for the addition of complex operations. Regservices will consult with the national manager to determine if the operation is deemed complex.

It is recommended that the pre-application meeting, chaired by the CASA project manager, be attended by all project team members and the applicant or their representatives.

The conduct of the meeting must give due consideration to the applicant's capabilities and expertise.

The following items must be included in the agenda for discussion at the pre-application meeting:

- a. The proposed operations;
- b. The proposed management structure and the qualifications and experience of the personnel proposed to conduct the operations;
- c. The proposed location and facilities. The facilities need to be in a ready state for on-site inspection and testing, if required;
- d. The certification process, and the roles and responsibilities of CASA and the applicant during the certification process. The applicant should be advised of situations that may cause delays and the suspension of the assessment process (e.g. incomplete or unsatisfactory documents, unsatisfactory inspections and tests and/or payment delays). The applicant must clearly understand that the documentation must be submitted in sufficient time to allow CASA to complete the assessment process and to issue the AOC before the intended commencement date of the applicant's operations. Delay by the applicant in responding to CASA will adversely impact on the time taken to complete the assessment phase and may result in suspension or cancellation of the application;
- e. Regulatory service fees. The applicant must clearly understand the distinction between the provision of advice at the pre-application meeting—which does not attract a regulatory service fee, however, the provision of assessments, checks, inspections and consultancy advice after the pre-application meeting—which attracts a regulatory service fee.

Note: Minutes should be taken during the pre-application meeting and distributed to all participants

4. List of supplements

Only the following supplements may be used in support of this protocol. The most recently approved versions will be found on the CASA intranet website. Approved forms are located on CASA's external website.

- Principle (OPS.137) Aerial application operations - other than rotorcraft;
- Worksheet (OPS.137) Aerial application operations - other than rotorcraft.

5. Scope

This protocol is for the assessment of an initial issue AOC application under the requirements of the Act and Part 137. This protocol may also be used for new AOC's for certain variations to an existing AOC, such as:

- adding a new aircraft;
- adding a new aerial application activity;
- any other matter requiring assessment under this worksheet.

The Protocol will also be used to support ongoing surveillance activities.

6. Competency requirements

To conduct the assessment, inspectors must have successfully completed the foundation training and advanced regulatory assessment training programs. Flight operations inspectors (FOIs), airworthiness inspectors and dangerous goods inspectors must hold the appropriate qualifications for the assessment of their specific areas.

Inspectors must also complete additional training in any other protocols related to the assessment.

7. Associated legislation

Table 1. Legislation associated with this protocol

Document	Title
	Civil Aviation Act 1988
Part 11 of CASR	Regulatory administrative procedures
Part 61 of CASR	Flight crew licensing
Part 91 of CASR	General operating and flight rules
Part 99 of CASR	Drug and alcohol management plans and testing
Part 137 of CASR	Aerial application operations - other than rotorcraft
Part 4A of CAR	Maintenance
Part 4B of CAR	Defect reporting
Part 4C of CAR	Flight manuals
Part 91 MOS	Part 91 (General operating and flight rules) Manual of Standards 2020
CAO 100.5	General requirements in respect of maintenance of Australian aircraft) 2
CASA EX32/24	Flight Crew Licensing (Miscellaneous Exemptions) Exemption 2024
CASA EX67/24	Part 91 of CASR – Supplementary Exemptions and Directions Instrument 2024
CASA EX101/25	Part 137 and Part 91 of CASR – Supplementary Exemptions and Directions Instrument 2022

Document	Title
CASA 31/23	Flight Training and Flight Tests for Grant of Sling Operations, Winch and Rappelling Operations, and Firefighting Endorsements Approval 2023
CASA 56/24	Flight training and flight tests (miscellaneous) approvals 2024

8. Guidance references

Table 2. Guidance material relevant to this protocol

Document	Title
AC 1-01	Understanding the legislative framework
AC 1-02	Guide to the development of expositions and operations manuals
AC 1-04	Registered operator responsibilities for continuing airworthiness
AC 91-10	Operations in the vicinity of non-controlled aerodromes
AC 91-22	Aircraft checklists
AC 91-25	Fuel and oil safety

9. ICAO references

Table 3. ICAO references applicable to this protocol

Document	Title
Annex 2	Rules of the air

10. Revision history

Amendments/revisions of this protocol are recorded below in order of most recent first.

Table 4. Revision history table

Version No.	Date	Parts/Sections	Details
1.1	December 2025	7	Added CASA EX67/24 and amended exemption CASA EX101/25
1.0	January 2025	All	First release