



Australian Government
Civil Aviation Safety Authority

KEY PERSONNEL GUIDE

REOC CHIEF REPL

INSTRUCTOR (CRI)



WHO THIS GUIDE IS FOR:

- Current and prospective chief RePL instructors (CRI) of remote pilot licence (RePL) training organisations
- Remotely piloted aircraft operator's certificate (ReOC) holders and applicants seeking approval to conduct RePL training
- Chief remote pilots (CRP) and chief executive officers (CEO) of RePL training organisations
- RePL training instructors and examiners
- Personnel responsible for nominating or assessing CRI candidates

Disclaimer: This guide was prepared by CASA for educational and awareness purposes and was correct at the time of publishing. Always use with current operational legislation. Visit casa.gov.au/disclaimer

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INTRODUCTION

Every remote pilot licence (RePL) training organisation has a responsibility to deliver safe, consistent and high-quality training.

A remotely piloted aircraft operator's certificate (ReOC) holder that provides RePL training must be authorised to conduct training. The organisation must also nominate a chief RePL instructor (CRI), in addition to its chief remote pilot (CRP).

The CRI oversees the quality and conduct of RePL training. They apply the organisation's documented practices and procedures to help ensure each course complies with civil aviation legislation. This includes Part 101 of the Civil Aviation Safety Regulations (CASR) 1998 and the Part 101 Manual of Standards (MOS).

This guide explains our expectations for the responsibilities, authority and oversight of a CRI. It should be read with the organisation's documented practices and procedures, ReOC conditions, CASR Part 101 and the Part 101 MOS.

Reference CASR Part 101 and sections 2.29A and 2.29B of the Part 101 MOS.

THE ROLE

The CRI is the nominated person responsible for RePL training quality. A RePL training organisation must have a CRI at all times while conducting RePL training.

The CRI helps ensure:

- RePL training is delivered safely and consistently
- courses follow aviation legislation and documented practices and procedures
- RePL training instructors are qualified and remain current and competent
- examiners meet the relevant requirements
- training standards, records and documents are maintained
- training deficiencies are identified and fixed.

The CRI should remain involved in the delivery and oversight of RePL training. This helps maintain awareness of training quality, instructor capability, student outcomes and emerging risks.

Depending on the size and complexity of the organisation, the CRI may also perform other operational or management roles. In smaller organisations or sole traders, one person may hold several responsibilities.

The CRP may also be nominated as the CRI. We must assess and approve the CRP in writing before they can also perform the CRI role. The organisation should consider whether the person has enough time, knowledge and support to perform each role effectively.

If a training organisation does not have a CRI, it must not conduct RePL training until we approve a CRI.

The organisation must clearly define the CRI's responsibilities, authority and reporting lines in its documented practices and procedures.

We may review training oversight arrangements, management structures and nominated personnel during ReOC application, variation and oversight activities.

Reference sections 2.29A and 2.29B of the Part 101 MOS



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QUALIFICATIONS AND EXPERIENCE

The RePL training organisation must nominate the CRI to us. We must approve the nominated CRI before the person can perform the role.

To be eligible, the CRI must:

- hold a RePL that covers each type of remotely piloted aircraft (RPA) used in training, including each make and model for medium RPA
- meet the requirements to be a RePL training instructor
- hold an eligible teaching or instructor qualification.

The teaching or instructor qualification may be:

- a Part 61 flight instructor rating
- a Certificate IV in Training and Assessment
- a recognised tertiary teaching qualification.

Where an applicant does not hold one of these qualifications, we may consider other qualifications or experience. The applicant must demonstrate that these are equivalent to one of the qualifications listed above.

The CRI must meet the RePL training instructor requirements. These include being employed by the training organisation and holding a RePL that covers the type of RPA they instruct.

RePL training instructors delivering the practical competency component must meet the experience, currency and recency requirements in the organisation's documented practices and procedures.

The CRI should have enough training, operational and leadership experience for the organisation's size, complexity and training scope.

The CRI should also demonstrate:

- knowledge of RePL syllabus content, training standards and regulatory requirements
- strong communication skills
- sound judgement
- effective instructional leadership
- the ability to manage training quality
- the ability to support safe decision-making under training or operational pressure.

Reference sections 2.29A and 2.30 of the Part 101 MOS.

ONGOING QUALIFICATIONS AND EXPERIENCE

The CRI must continue to meet the eligibility and capacity requirements for the role. This includes maintaining the required qualifications, experience, currency and capacity.

The CRI must maintain enough RePL training knowledge to perform the role effectively.

This includes staying up to date with:

- changes to legislation, guidance and ReOC conditions
- training procedures and course material
- RePL training instructor competency and examiner authorisations
- training performance, examination results and flight test outcomes
- knowledge deficiency reports and student feedback
- training records, risks and controls.

The CRI should maintain regular contact with RePL training instructors, examiners, the CRP and other relevant personnel.

We may suspend or revoke a CRI approval if the CRI does not perform their duties in a way that maintains aviation safety. We may also suspend or revoke approval if the CRI lacks the capacity or time to safely perform the role.

The ReOC holder should ensure the CRI has:

- enough time to oversee training
- access to current training documents
- enough instructors and suitable RPA
- clear reporting lines to the CEO and CRP
- authority to act on training risks and deficiencies
- support to maintain instructor and examiner standards.

Reference section 2.29A of the Part 101 MOS.



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RESPONSIBILITIES

The CRI must safely manage the conduct of each RePL training course.

The CRI must:

- ensure courses comply with aviation legislation and follow documented practices and procedures
- set, monitor and maintain RePL training standards
- identify and fix training outcome deficiencies
- ensure RePL training instructors remain competent
- be satisfied instructors meet examiner requirements before authorising them as examiners
- ensure suitable RPA and instructors are available
- sign and date course completion certificates
- keep the RePL training course records required under the MOS.

Reference sections 2.29, 2.29B, 2.30A and 10.03A of the Part 101 MOS.

RePL training courses

The CRI must ensure each RePL training course runs in a professional and systematic way, using competency-based training principles.

The CRI must ensure each course complies with civil aviation legislation, including CASR Part 101 and the Part 101 MOS, and follows documented practices and procedures.

The CRI must regularly report to the CEO and CRP on course compliance.

The CRI must ensure the organisation's documented practices and procedures support competent and effective training for each applicant.

This should include clear procedures for:

- course structure
- aeronautical knowledge training
- practical competency training
- examinations
- flight tests
- assessment decisions

- knowledge deficiency reports
- resits and repeat flight tests
- course completion requirements
- instructor and examiner oversight.

Reference CASR Part 101 and section 2.29B of the Part 101 MOS.

Training standards

The CRI must set, monitor and maintain the organisation's RePL training standards.

The CRI must also establish, implement and manage procedures to identify and fix deficiencies in training outcomes.

The CRI should help maintain a positive training culture. Instructors and students should feel comfortable raising safety concerns, asking questions and addressing knowledge gaps.

This may include reviewing:

- course content
- suitability of the RPA types used for training
- lesson plans
- training delivery
- instructor performance
- examiner decisions
- examination outcomes
- flight test outcomes
- student feedback
- recurring student knowledge gaps
- training documents and checklists.

CASA guidance states that organisations should keep RePL training documents complete and up to date. It also recommends an annual review of RePL training documents.

Reference section 2.29B of the Part 101 MOS and Annex A to AC 101-01.

Instructors and examiners

The CRI must ensure each RePL training instructor receives the training, information and documents needed to deliver competent and effective training.

The CRI must ensure each instructor receives initial and regular assessments. These assessments must confirm the instructor can start and continue assigned training or examining duties.

The CRI must ensure RePL training instructors remain competent. The CRI must also ensure any refresher training remains suitable for its purpose.

The CRI should keep records for each instructor and examiner, including:

- licences
- ratings
- qualifications
- certificates
- relevant operational experience
- instructor assessments
- examiner authorisations
- refresher training
- competency checks.

Before the CRI authorises a RePL training instructor to act as an examiner, the CRI must be satisfied the instructor meets the examiner requirements.

Reference sections 2.29B, 2.30 and 2.30A of the Part 101 MOS.

Resources and training RPA

The CRI must ensure the organisation has enough RePL training instructors and appropriate RPA for each course.

The CRI should consider whether the RPA can safely perform the manoeuvres required for the relevant practical competencies.

The CRI should consider:

- the number of students per instructor
- instructor availability
- examiner availability
- RPA category, type, weight and complexity
- RPA serviceability
- training area suitability
- student support needs
- weather and operational limits
- the practical competency standards being taught.

The CRI should help ensure the training organisation has suitable systems to monitor instructor availability, RPA availability and training capacity.

Reference section 2.29B of the Part 101 MOS.

Examinations and flight tests

The CRI must ensure examinations and flight tests comply with the Part 101 MOS and documented practices and procedures.

The CRI should check that the organisation's documented practices and procedures explain how it will comply with MOS examination requirements.

This should cover:

- examination conduct
- supervision
- assessment
- results
- resits
- question security
- knowledge deficiency reports
- flight test conduct
- additional training after failed flight tests
- examiner authorisations.

The CRI must keep required examination and flight test records so the training organisation can meet its record-keeping duties.

Reference sections 2.09, 2.13, 2.15, 2.16, 2.17, 2.18, 2.30A and 2.31 of the Part 101 MOS.

Course completion certificates

The CRI must sign and date each certificate of course completion.

Each certificate must include:

- the training organisation's name and aviation reference number (ARN)
- the student's name and ARN
- the course name
- the full names of the RePL training units
- the name of the person who conducted the practical competency component
- the automated operation mode, for an automated-operation-only course
- both automated and manual operation modes, for a manual operation course
- the course completion date.

Before signing, the CRI should check that the student has:

- completed any prerequisite RePL training, where applicable
- passed the aeronautical knowledge examination
- been assessed as competent in the relevant practical competency units
- passed the relevant flight test
- remedied any knowledge deficiency.

The CRI should support the training organisation in notifying CASA that the certificate of course completion has been issued.

Reference section 2.29 of the Part 101 MOS.

Training records

The training organisation must ensure the CRI keeps RePL training course records.

These records include:

- applicant details
- course name and nature
- RPA category, type and complexity
- course dates
- RePL training units covered
- course outcomes
- examination records
- flight test records
- the RPA used for each flight test.

The training organisation must also ensure the CRI keeps records showing they are regularly and professionally performing their duties.

The CRI should keep these records complete, current and available to support oversight.

Records must be kept for at least 7 years.

Reference sections 10.03 and 10.03A of the Part 101 MOS.

Engagement with CASA

The CRI supports CASA oversight of the organisation's RePL training activities.

This may include:

- supporting ReOC application, renewal or variation processes
- supporting CASA inspections or reviews
- providing information about RePL training procedures
- supporting changes to training privileges, instructors or examiners
- helping ensure the organisation provides required applications or notifications to CASA.

The CRI should also support clear and timely communication with us when training activities, personnel or procedures change.

Reference AC 101-01, Annex A to AC 101-01, section 2.29 of the Part 101 MOS and ReOC application, variation and renewal guidance.



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THE APPOINTMENT

A nominated CRI should understand the appointment process before acting in the role.

A ReOC holder must hold an authorisation before conducting RePL training. The ReOC holder may need to apply to add RePL training or vary its ReOC.

The training organisation must nominate a CRI and submit supporting evidence. We must approve the nominated CRI before the organisation conducts RePL training.

If an existing training organisation needs to change its CRI, it must submit the relevant ReOC application form and supporting evidence.

Before acting in the role, the nominated CRI must understand:

- the ReOC conditions
- the documented practices and procedures
- the approved RePL training courses
- the RPA and systems used for training
- instructor and examiner requirements
- student assessment requirements
- course completion requirements
- training records
- training risks and controls
- approval conditions and operational limits.

The nominated CRI should check that the organisation's documented practices and procedures clearly describe:

- the CRI role
- the CRI's authority
- reporting lines to the CEO and CRP
- instructor and examiner approval processes
- course delivery controls
- training document control
- record keeping requirements
- how training deficiencies will be fixed.

CASA guidance states that documented practices and procedures should be written as clear instructions. We will not accept text copied directly from the MOS or guidance as a suitable procedure.

Reference section 2.29A of the Part 101 MOS, Annex A to AC 101-01 and ReOC application, variation and renewal guidance.



THE INTERVIEW

We assess the nominated CRI through desktop and on-site components.

The CRI assessment may include scenario-based activities and questions about RePL training under the organisation's ReOC.

The nominated CRI must be able to demonstrate knowledge of:

- the organisation's documented practices and procedures
- CASR Part 101
- the Part 101 MOS
- RePL training course requirements
- competency-based training principles
- instructor and examiner requirements
- examination and flight test requirements
- training records and document control.

The nominated CRI must also be able to show they can:

- safely manage RePL training course delivery
- monitor RePL training instructor competency and examiner authorisations

- maintain training standards
- identify and fix training deficiencies
- maintain required training records and documents
- report effectively to the CEO and CRP.

We will assess whether the nominated CRI:

- holds a RePL that covers each type of RPA used in training
- holds an eligible teaching or instructor qualification
- meets the RePL training instructor requirements
- has the capacity to perform the CRI role.

Once assessed in an RPA category, the CRI does not need a separate flight test for each model. We will issue a generic rating for that category. Depending on the organisation, we may also assess whether the nominated CRI:

- has knowledge and experience suited to the training activities
- understands the organisation's approvals, procedures and risk controls.

Reference sections 2.29A, 2.29B, 2.30, 2.30A, 10.03 and 10.03A of the Part 101 MOS.

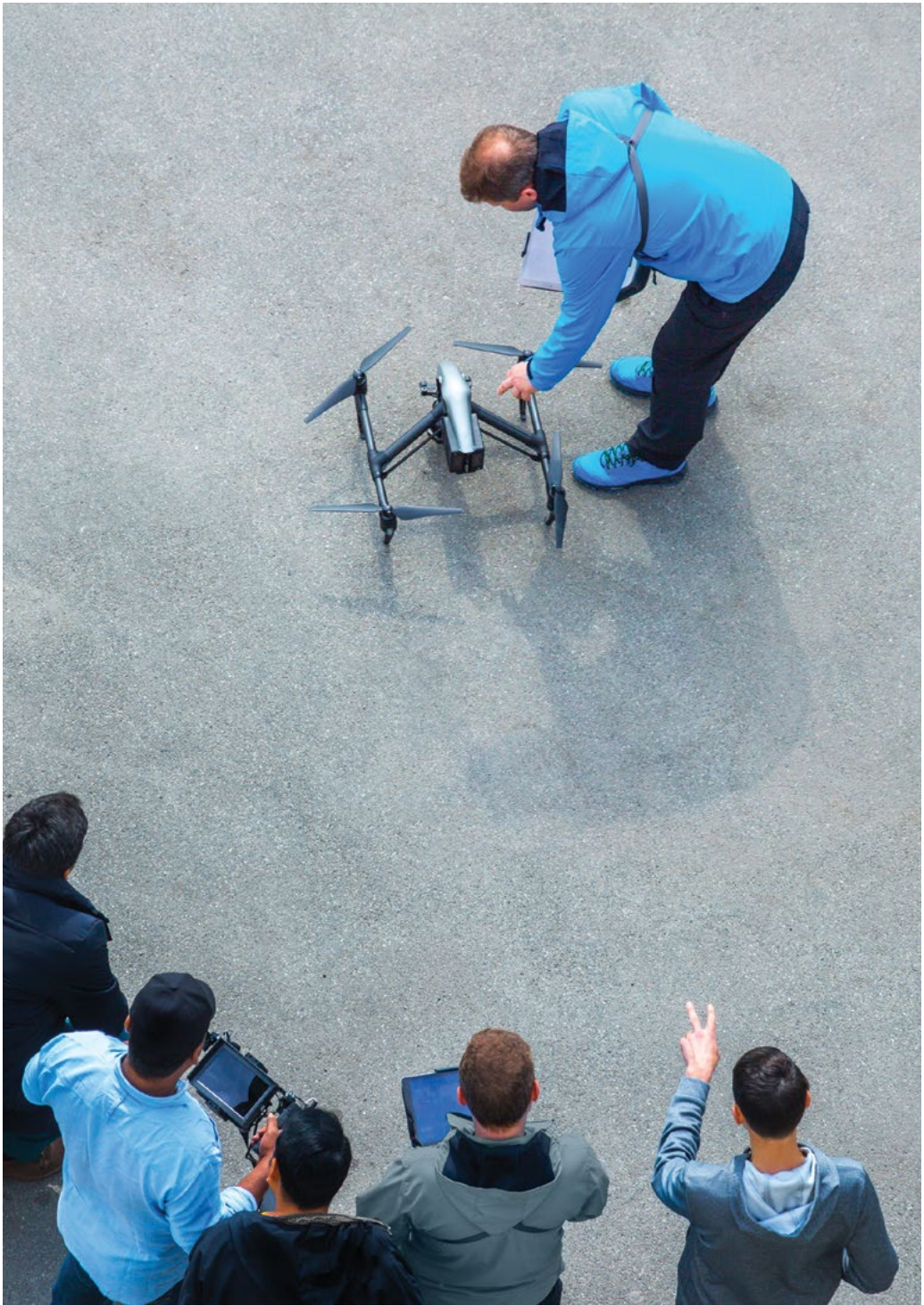


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COMMON RISKS AND CHALLENGES

Many RePL training organisations continue to evolve in scale, delivery method and operational complexity. This can create challenges for training oversight, instructor competency, records and procedural consistency.

Areas requiring ongoing attention may include:

- ensuring RePL training instructors remain competent
- ensuring examiners meet the relevant requirements
- maintaining procedures that match approved training activities
- keeping training and assessment records complete and current
- maintaining current course material and lesson plans
- controlling examination questions and records
- managing student knowledge deficiencies
- monitoring student outcomes and training trends
- ensuring RPA remain suitable for training activities
- managing changes to training privileges and personnel
- maintaining oversight across several locations or training teams
- ensuring one person holding several roles has enough time and support.

The CRI plays an important role in identifying training risks early. This helps maintain appropriate oversight, records, procedures and communication as the organisation changes.

RELATED GUIDANCE

Refer to:

- Civil Aviation Safety Regulations 1998 (CASR) Part 101
- Part 101 (Unmanned Aircraft and Rockets) Manual of Standards 2019
- Advisory Circular 101-01: Remotely piloted aircraft systems licensing and operations
- Annex A to AC 101-01: Remote Pilot Licence (RePL) Training Course
- ReOC application, variation and renewal guidance
- Chief RePL Instructor transition and guidance
- RPAS sample operations manual and guide.

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