



25 Stoney Creek Rd Bexley 2207 NSW
Ph: (02) 9554 9399 Fax: (02) 9554 9644
Email: alaea@alaea.asn.au
Web: www.alaea.asn.au
ABN: 84 234 747 620

❖ NOTICE ❖

TO: All ALAEA Members

RE: CASR Part 66 Post-Implementation Review

Most of you would be acutely aware that it has been almost six years since CASA introduced CASR Part 66 Licencing into Australia.

Part 66 replaced the existing CAR 31 progressive “group” licencing system that had been in place, providing licence coverage for all civilian registered aircraft for many years. This was replaced with a European-based system consisting of Category A, B1, B2 and C licences with or without exclusions and inclusions.

Part 66 was introduced as part of a “Suite of Maintenance Regulations” consisting of Parts 42 (Continuing Airworthiness), 66 (Personnel Licencing), 145 (Approved Maintenance Organisations) and 147 (Approved Training Organisations).

The ALAEA has been calling for a review of the suite of maintenance regulations for several years; mostly falling on deaf ears. We have been doing so, in part, because of the amount of confusion and ambiguity in the wording of the regulations. Often we have encountered inconsistent advice when clarification of issues has been sought through CASA.

For years we have participated in consultation committees to develop regulations to address how Part 66 licencing could be adapted to best suit non-type rated aircraft (Small Aircraft). It was through this process, when CASA were about to make an amendment to the Part 66 MOS, that it became very evident there were serious structural flaws within the system. The ALAEA organised meetings firstly between the Category training Part 147 organisations and then between CASA, the Part 147’s and the Regional Aviation Association (RAAA) to assist the schools to demonstrate to CASA the regulation’s technical shortfalls and the disastrous effects the amendment would likely have on the industry.

To give credit where it is due, the new management representatives from CASA Standards and Licencing were very pragmatic, listened to the concerns and resolved to hold back the amendment and to commence a review of Part 66. For this they should be congratulated.

There is only a short time left before the date for submission to the review closes so this is a reminder that if you have an observation or comment on Part 66 you need to take 5 – 10 minutes to write them down and send them in to CASA.

If you only have one specific example of where you think an improvement could be made, send it in. If you wish to draft a five page critique, do that as well. If you have positive comments on where you think Part 66 works well, you should provide that feedback also.

“Guardians of Air Safety”

The ALAEA will be making an official submission to supplement our ongoing dialogue with CASA over the regulations.

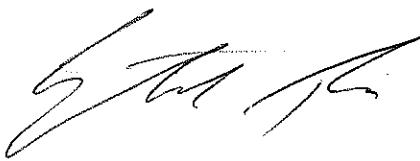
It will cover issues such as:

- clarity of regulation
- complexity of licences in relation to privileges
- training being fit for purpose
- access to training
- helicopter ratings and training
- harmonisation between CASR, EASR (Europe) and the new DASR (Defence Regulations)
- small aircraft
- FADEC privileges
- Category A privileges and training
- Part 145 Specialist Maintenance certification

The details for the scope of the CASR Part 66 review can be found on the CASA website under the "Rules and Regulations – Changing the Rules" page:

<https://www.casa.gov.au/standard-page/pir-1703ms-post-implementation-review-part-66-continuing-airworthiness-aircraft>

We strongly urge you to consider contributing to the review and we also welcome the opportunity to read your comments if you wish to forward a copy to us as well. They can be emailed to alaea@alaea.asn.au



STEPHEN RE
Trustee