



DEFENCE AVIATION SAFETY AUTHORITY

NOTICE OF PROPOSED AMENDMENT FOR DASR CHANGE PROPOSAL 0029

CLARIFICATION OF KEY MANAGEMENT APPOINTMENTS AND REQUIREMENTS FOR A FORM 4

INTRODUCTION

Applicability

1. This proposal is applicable to all DASR users who are involved with or subject to compliance with DASR 145, 147 and M.

Purpose

2. The purpose of this Notice of Proposed Amendment (NPA) is to allow for community consultation in regards to proposed amendments to the following Acceptable Means of Compliance (AMC):

- a. AMC 145.A.30 – *Management Personnel (AUS)*
- b. AMC 147.A.105(b) – *Personnel requirements*
- c. AMC M.A.706 – *Personnel requirements*

3. The benefit of this proposal is to clarify requirements for key management appointments, including personnel who require acceptance by DASR, and to emphasise the importance of succession planning for key appointments so there is no period (including during posting cycles) when no one is appointed to fulfil these duties.

Background

4. A review of DASR AMC for personnel requirements identified a need to clarify the AMC for the requirements for management personnel. The relevant AMC in DASR 145 and DASR M are not consistent and, in some cases, repeat the regulation. The description of 'Deputy' nominated management personnel was found to be confusing / prescriptive and has been replaced with outcome-based language highlighting the need for succession planning. There is no change to the personnel that require DASA approval via Form 4, but the new AMC clarifies when a new Form 4 application is required for personnel replacing key management personnel. The DASR change also aligns / harmonises AMC between DASR 145 and M, deletes AMC that repeats the regulation, and adds consistent AMC to DASR 147.

Proposed Amendments

5. The proposed amendments amend and align AMC for personnel requirements in DASR 145, 147 and M. The proposed amendments are in Annex A.

Implementation Strategy

6. The proposed amendments are intended to be released by DASA in the DASR 31 Jul 25 release.



HOW TO SUBMIT COMMENTS ON THIS NPA

Format

7. Responses to this NPA are to be recorded on the NPA Response Sheet included at Annex B.
8. Responses are to be submitted by email to [DASA.DCA Regs](#). Hardcopies of the NPA Comment Sheet are not required.

Timing

9. Comments on NPA for DCP - 0029 are to be forwarded to DASA by close of business Friday, 13 Jun 25.

Additional Information

10. Please send any requests for additional information or questions concerning this NPA to DASA at [DASA.DCA Regs](#)

DISPOSITION OF RESPONSES RECEIVED

11. A Comment Response Document will be prepared and published on the [DASA Website](#). DASA will not individually acknowledge or respond to comments or submissions, but may seek to clarify or discuss submissions with originators to ensure feedback is fully understood.

for **AR Newman**
Captain, RAN
Director Continuing Airworthiness
Defence Aviation Safety Authority
Tel: (02) 5109 5415

May 25

Annexes:

- A. NPA for DCP - 0029 - Proposed Changes to DASR
- B. NPA for DCP - 0029 - Response Sheet



AMC 145.A.30

Current AMC 145.A.30

Current heading

AMC 145.A.30 - Management Personnel (AUS)

Management Personnel are classified as follows:

The ACCOUNTABLE MANAGER (AM) (DASR 145.A.30(a)) is the person with the corporate authority to ensure that all maintenance required can be financed and carried out to the standard required by DASR 145.

The Nominated Personnel (DASR 145.A.30(b) and DASR 145.A.30(c))* shall be the group of personnel (or person) responsible for ensuring that the maintenance organisation complies with DASR 145. In any case these personnel should report to the Accountable Manager. This (ese) manager(s) may assign DASR 145 functions to other manager(s) working directly under their respective responsibility. In this case the nominated personnel (person) remains responsible for compliance with DASR 145.

The Deputy Nominated Personnel (DASR 145.A.30(b)(4)) shall be the group of personnel (or persons) who are nominated via DASR Form 4 to deputise any particular nominated personnel in case of lengthy absence of the said person. The deputy nominated person is responsible for compliance with DASR 145 upon formal notification from the nominated person for the duration of the nominated persons absence.

Other Manager(s) (DASR AMC 145.A.30(b)(8)) Depending either on the size of the maintenance organisation or on the decision of the Accountable Manager, the maintenance organisation may appoint additional managers for any DASR 145 function(s). This (ese) manager(s) shall report ultimately to the nominated personnel identified to be responsible for the related DASR 145 function(s) and therefore by definition are not to be considered themselves as nominated personnel. As a consequence a manager can be only assigned duties (not responsibilities) of the nominated personnel to whom they report.

The Responsible NDT Level III shall be the person designated by the maintenance organisation to ensure that personnel who carry out and/or control a continued airworthiness non-destructive test of aircraft structures and/or components are appropriately qualified for the particular non-destructive test in accordance with the European or equivalent Standard recognised by DASA.

Management personnel requiring a DASR Form 4. Based on the above definitions of management personnel, the following table summarises when a DASR Form 4 is required in order for the management personnel to be acceptable to DASA.

MANAGEMENT PERSONNEL	DASR Form 4 Required	DASR Form 4 Not Required
Accountable Manager (DASR 145.A.30(a))		X
Nominated Personnel (Responsible and Quality Manager) (DASR 145.A.30(b) and DASR 145.A.30(c))*	X	
Safety Manager (DASR 145.A.65 and DASR SMS)		X
NDT Responsible Level III	X*	
Other Managers (DASR AMC 145.A.30(b)(8))		X
Deputy Nominated Personnel (DASR 145.A.30(b)(4))	X**	

* Form 4 not required when a member of the MAA.

** The MOE procedure shall make clear who deputises for any particular nominated personnel in the case of lengthy absence of the said person. In any case it is the responsibility of the maintenance organisation to ensure that deputy personnel are nominated and approved by the MAA via a DASR Form 4 prior to assuming the role of the nominated person.

Revised AMC 145.A.30

New heading

AMC 145.A.30 - Personnel requirements (AUS)

1. The following table summarises when a DASR Form 4 is required in order for personnel to be acceptable to DASA.

MANAGEMENT PERSONNEL	DASR Form 4 Required
Accountable Manager (DASR 145.A.30(a))	No
Nominated Personnel (Responsible and Quality Manager) (DASR 145.A.30(b) and DASR 145.A.30(c))	Yes
Safety Manager (DASR SMS)	No
Other Management Personnel (DASR AMC 145.A.30(b)(8))	No
NDT Responsible Level III (DASR 145.A.30(f))	Yes*

* DASR Form 4 not required when a member of DASA.

2. Succession planning is critical to ensure an Accountable Manager, Safety Manager and Nominated Personnel are always appointed and there is no period (including during posting cycles) when no one is appointed to fulfil these duties. For Nominated Personnel, the maintenance organisation is to ensure that personnel are accepted by DASA, via a Form 4, prior to assuming the role. When alternate personnel are appointed, it must be clearly articulated and promulgated when, and for what period, the incumbent relinquishes the duties of the position and the replacement assumes the duties.
3. For short absences of the incumbent, an Accountable Manager, Safety Manager or Nominated Personnel may task a person or group of persons to act in their role. In this instance, the Accountable Manager, Safety Manager or Nominated Personnel retain accountability for all functions performed during their absence. Persons acting for Nominated Personnel during short absences do not require a Form 4.

AMC M.A.706

Current AMC M.A.706 (paragraphs 5 to 9)

5. Nominated Deputy Management Personnel. A nominated deputy is a person who may be appointed as an alternate to the nominated person, when the incumbent nominated person is absent for a period of time. To ensure clear lines of responsibility, the nominated deputy is required to assume all responsibilities when formally appointed in the absence of the incumbent nominated person. As a result, the nominated deputy is required to satisfy the same qualification experience and knowledge requirements as the incumbent per the relevant AMC and is to be approved by the NMAA. This approval can either be through the CAME or on a Form 4 depending if the nominated person's position requires a Form 4 approval per the table below.

6. There can only be one person fulfilling the role of the nominated position at any single point in time. When designating a nominated deputy to fulfil the role of the nominated position, it should be clearly articulated and promulgated when the incumbent relinquishes responsibility of the position and a nominated deputy assumes responsibility as the nominated person and for what period.

7. Note, a deputy Accountable Manager or deputy nominated person is not intended to replace the nominated person for an indefinite period of time. This particularly applies when the Accountable Manager or a nominated person leaves the CAMO; in such a case the new nominated person is to be appointed within a reasonable period of time as agreed by the NMAA.

8. Where a nominated position requires a Form 4 approval, and the nominated person has not nominated an alternate person to be their deputy in the regulatory intent, the nominated person may still task a person or group of persons without a Form 4 approval to fulfil the duties of the nominated person, however the nominated person retains responsibility for all functions performed.

9. Management Personnel Requiring a Form 4. The following table summarises when a DASR Form 4—Acceptance Of Nominated Management Personnel, is required in order for the management personnel to be approved by the NMAA.

MANAGEMENT PERSONNEL	DASR Form 4 Required	DASR Form 4 Not Required
Accountable Manager (DASR M.A.706(a))		X
Continuing Airworthiness Manager (DASR M.A.706(d))	X	
Quality Manager (DASR M.A.706(f) and DASR M.A.712(a))	X	
Safety Manager (DASR M.A.712(g) and DASR SMS)		X
Nominated Management Team (DASR M.A.706(c))		X*
Airworthiness Review Staff (DASR M.A.707(b))	X	
Maintenance Program Approval Employee (DASR AMC M.A.706(f))		X
Other Managers		X
Deputy Nominated Personnel	X**	

* DASR M.A.706(c) positions should be appointed by the CAMO and will be accepted by the NMAA as part of the CAME approval and do not require a Form 4 approval. Form 4 applications for these personnel will only be processed if it is the intent that the person will be appointed as the CAM for a period of time in the absence of the CAM, i.e. a deputy CAM.

** A deputy requires a Form 4 approval when they are nominated as a deputy for a position requiring a Form 4 approval per this table.

Revised AMC M.A.706 (paragraphs 5 to 8)

5. The following table summarises when a DASR Form 4 is required in order for personnel to be acceptable to DASA

MANAGEMENT PERSONNEL	DASR Form 4 Required
Accountable Manager (DASR M.A.706(a))	No
Continuing Airworthiness Manager (DASR M.A.706(d))	Yes
Quality Manager (DASR M.A.712(a))	Yes
Safety Manager (DASR SMS)	No
Other Management Personnel (DASR M.A.706(c))	No
Airworthiness Review Staff (DASR M.A.707(b))	Yes
Maintenance Program Approval Employee (DASR AMC M.A.706(f))	No

6. Where a CAMO chooses to appoint 'Other Management Personnel' for any or all combinations of the identified DASR M functions (including assistants / delegates of key management personnel), these managers should report through either the Continuing Airworthiness Manager, Quality Manager or Safety Manager, as appropriate, to the Accountable Manager.

7. Succession planning is critical to ensure an Accountable Manager, Continuing Airworthiness Manager, Quality Manager and Safety Manager are always appointed and there is no period (including during posting cycles) when no one is appointed to fulfil these duties. For the Continuing Airworthiness Manager or Quality Manager, the CAMO is to ensure that personnel are accepted by DASA, via a Form 4, prior to assuming the role. When alternate personnel are appointed, it must be clearly articulated and promulgated when, and for what period, the incumbent relinquishes the duties of the position and the replacement assumes the duties.

8. For short absences of the incumbent, an Accountable Manager, Continuing Airworthiness Manager, Quality Manager or Safety Manager may task a person or group of persons to act in their role. In this instance, the Accountable Manager, Continuing Airworthiness Manager, Quality Manager or Safety Manager retain accountability for all functions performed during their absence. Persons acting for the Continuing Airworthiness Manager or Quality Manager during short absences do not require a Form 4.

AMC 147.A.105(b)**Current AMC 147.A.105(b)**

Current heading

AMC 147.A.105(b) - Personnel requirements

With the exception of the Accountable Manager, a DASR Form 4 should be completed for each person nominated to hold a position required by DASR 147.A.105(b).

Revised AMC 147.A.105(b)

New heading

AMC 147.A.105(b) - Personnel requirements (AUS)

1. The following table summarises when a DASR Form 4 is required in order for personnel to be acceptable to DASA

MANAGEMENT PERSONNEL	DASR Form 4 Required
Accountable Manager (DASR 147.A.105(a))	No
Training Manager (DASR 147.A.105(b))	Yes
Quality Manager (DASR 147.A.105(b))	Yes
Examination Manager (DASR 147.A.105(b))	Yes
Other Management Personnel	No

2. Where a maintenance training organisation chooses to appoint 'Other Management Personnel' for any or all combinations of the identified DASR 147 functions (including assistants / delegates of key management personnel), these managers should report through either the Training Manager, Quality Manager or Examination Manager, as appropriate, to the Accountable Manager.

3. Succession planning is critical to ensure an Accountable Manager, Training Manager, Quality Manager and Examination Manager are always appointed and there is no period (including during posting cycles) when no one is appointed to fulfil these duties. For the Training Manager, Quality Manager or Examination Manager, the maintenance training organisation is to ensure that personnel are accepted by DASA, via a Form 4, prior to assuming the role. When alternate personnel are appointed, it must be clearly articulated and promulgated when, and for what period, the incumbent relinquishes the duties of the position and the replacement assumes the duties.

4. For short absences of the incumbent, an Accountable Manager, Training Manager, Quality Manager or Examination Manager may task a person or group of persons to act in their role. In this instance, the Accountable Manager, Training Manager, Quality Manager or Examination Manager retain accountability for all functions performed during their absence. Persons acting for the Training Manager, Quality Manager or Examination Manager during short absences do not require a Form 4.

NPA FOR DCP 0029 Response Sheet

CLARIFICATION OF KEY MANAGEMENT APPOINTMENTS AND REQUIREMENTS FOR A FORM 4

Please forward this sheet as an email attachment to [DASA.DCA Regs](#) by 13 Jun 25. A word version of this response sheet can be found via obj no: [BO3960659](#) or alternatively contact [DASA](#).

Please indicate your acceptance or otherwise of this proposal by ticking the appropriate box below. Additional comments, suggested amendments or alternative action are welcome and may be provided on this response sheet or by separate correspondence.

- [] The proposal is **acceptable without change**.
- [] The proposal is **acceptable but would be improved if the following changes were made**:
- [] The proposal is **not acceptable but would be acceptable if the following changes were made**:

LSN	NPA Reference: (i.e Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation
1			
2			
3			
4			
5			

RESOURCE IMPLICATIONS

Please provide specific comment on any significant resource implications that this proposal may have for your organisation, for both its implementation and ongoing compliance. Your comments should address both financial and human resource considerations.

Resource implications – Proposal implementation	
Resource implications – Proposal sustainment	



RESPONDENT DETAILS

Your name:	
Submission date:	
Your organisation:	
Email address:	
Postal address:	
Phone:	
Whose views are represented in your response? i.e. Is your response the authoritative response from your organisation?	Responding on behalf of : Individual [] Regulated Military entity [] Regulated Commercial entity [] Wing HQ [] Group HQ [] ADF Regulatory, Technical or Logistics policy agency [] Other commercial entity [], Other [] Please describe:
Do you consent to your name being published as an NPA respondent within the NPA Summary of Responses:	YES [] NO []

