



DEFENCE AVIATION SAFETY AUTHORITY

COMMENT RESPONSE DOCUMENT NPA FOR DCP 0024 DASR GR.60 OVERSIGHT AND ENFORCEMENT - FINDING DEFINITIONS AMENDMENT

INTRODUCTION

1. **General.** Readers should note that this Comment Response Document (CRD) outlines DASA's agreed policy and intended regulation changes and finalises the public consultation process in respect of this NPA. Only under extreme or unusual circumstances will DASA consider views or arguments opposing the views expressed in the CRD. Any member of the public having views or arguments to support an appeal against the decisions documented in this CRD may petition DASA to consider such an appeal.
2. **Background.** On 12 May 25, DASA released NPA for DCP – 0024 - *DASR GR.60 Oversight and Enforcement - Finding Definitions Amendment* for comment. The period for public comment on the proposals contained in this NPA closed on 06 Jun 25.

ANALYSIS OF COMMENTS

General

3. DASA received a number of comments back from the Aviation Safety community (refer Annex A) identifying the proposal as acceptable without change. However, there were also a number of responses received from organisations identifying opportunities for improvements ranging from general in nature (covering editorial and typographical errors) to more substantial technical changes impacting the greater Finding Management System. Where required, DASA has incorporated suggested editorial and typographical improvements including removal of italicisation and other grammatical changes.
4. Multiple organisations identified the need for the term 'credible' as a precursor to term 'serious hazard' for a Level 1 Finding which has been included in the final DASR Change Proposal at Annex B. DASA is aware the term 'credible' is currently not defined within the DASA Glossary and will address such at a future DASR release. In the interim, DASPMAN Volume 3 Section 8.2.2.8.a.ii (extracted below) provides the antonym from which 'credible hazard' can be derived:

A non-credible hazard is a defect that is considered so implausible as to its affect on Airworthiness that it does not need to be accounted for. To manifest into an Issue would require a series of exceptional failures or conditions to happen simultaneously making it impractical to consider for a given operational period.

5. The more substantial technical changes related to closer alignment with Risk methodology for greater clarity in finding determinations. DASA does not object to the intent of the suggestion and as briefed at the Findings Town hall 28 May 25 is considering how it can better leverage the Aviation Safety Event classification framework; namely Perceived Risk Level (PRL) matrix. Preliminary efforts in this regard have been captured within the subject NPA using the 'Barely Effective' descriptor for Level 2 Findings. The DASA Oversight and Enforcement Community of Practice will further consider the practical application of PRL matrix alignment through its continuous improvement obligations and further engage the Aviation Safety community as necessary.
6. The objective of the Finding Management System is to provide a mechanism to formally manage non-compliances with DASRs commensurate with the identified hazard to Aviation Safety. Flexibility has therefore been deliberately retained within the revised definitions to enable such an objective. With a focus on controls and their effectiveness it is expected that a more robust outcome will be achieved to the benefit of the collective Aviation Safety community.



7. DASA has actively engaged with all organisations that provided feedback to discuss their specific suggestions and provide more detailed feedback around the Finding Management System. DASA thanks all organisations for their continued support in regulatory improvement and the time invested in providing a response to the subject NPA.

AUTHORITY

8. The content of this Summary of Responses has been reviewed and is authorised.

AR NEWMAN

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Jul 25

Annexes:

- A. List of Respondents
- B. DASR AMENDMENT RECORD DCP 2024

NOTICE OF PROPOSED AMENDMENT – NPA FOR DCP 0024

LIST OF RESPONDENTS

1. Acceptable without change:
 - a. HQ AVNCOMD
 - b. HQ FAA
 - c. AWC
 - d. DIA
2. Suggested Changes:
 - a. HQ SRG
 - b. HQ AMG
 - c. AMTDU
 - d. HQ AFTG

DASR CHANGE PROPOSAL GR.60

1. DASR CLAUSE: GR.60(d)

- a. Level 1 Finding: Any non-compliance with a DASR requirement that presents a credible serious hazard to aviation safety and no organisational safety controls remain in place or the organisational safety controls in place are not effective to treat the hazard.
- b. Level 2 Finding: Any non-compliance with a DASR requirement that presents a credible hazard to aviation safety and organisational safety controls remain but the total effectiveness is minimal to treat the hazard.
- c. Level 3 Finding: Any non-compliance or potential problem that, if left untreated, would likely manifest into a credible hazard to aviation safety.

2. DASR CLAUSE: GM GR.60(d)

- a. An interpretation of Finding Levels in the context of DASR 147 are as follows:
 - (1) Level 1 Finding: would result from a failure of a training product that directly degrades training outcomes impacting Aviation Safety. Examples might include a failure to follow established training procedures that have a direct impact on training outcomes, significant deviation from approved training courseware, significant unapproved changes to the training organisation, or awarding training outcomes that have not been fully achieved.
 - (2) Level 2 Finding: would result from a failure of a training product, or a significant failure to comply with training governance requirements, that has the possibility to degrade training outcomes impacting Aviation Safety. Examples might include a deviation in training processes that impacts training outcomes, not effectively monitoring training standards, or a deviation from approved training courseware that that would likely impact Aviation Safety.
 - (3) Level 3 Finding: would result from a failure of a training product or failure to comply with training governance requirements that would likely manifest into a credible hazard to aviation safety. Examples might include minor errors in documentation or minor procedural deviations that, if left untreated, could lower safety standards or reduce effectiveness of training governance.