



NOTICE OF PROPOSED AMENDMENT (NPA) FOR DASR CHANGE PROPOSAL 0066/2026 Revision 0

DASR ARO.100

MILITARY AIR OPERATOR CERTIFICATE

INTRODUCTION

Reference:

- A. DFSB ASIR: 6th Aviation Regiment – *NHIndustries MRH-90 Taipan A40-040, Spatial Disorientation leading to Controlled Flight Into Terrain (CFIT), Whitsunday Islands, QLD, 28 Jul 23* ([BP48720677](#))

Applicability

1. This proposal is applicable to Military Air Operators (MAOs).

Purpose

2. The purpose of this NPA is to enable Defence Aviation Safety community input into the revision of DASR ARO.100, ahead of its planned release in Mar 27.
3. The proposed amendment is expected to:
- a. align DASR ARO.100 with best practice of other Military Aviation Authorities (MAA) and EMAR-based DASR compliance confirmation requirements during regulation changes
 - b. address elements of recommendations from Ref A.
4. The benefits expected from the proposal include enhancing the effectiveness of:
- a. DASA's and MAOs' regulatory compliance and change management oversight during DASR amendments
 - b. DASA's ability to provide regulatory compliance feedback on modified MAO OIP ahead of the OIP's release, thus proactively improving Aviation Safety.

Background

5. In March 2025 DFSB released Ref A, recommending that, *inter alia*, 'DG DASA review policy for the *issuance* and *retention* of [MAO] organisational authorisations...in order to improve [the] efficacy of assessments of initial and ongoing compliance with DASR pertaining to Flight Operations and Cross-Regulatory requirements'.¹
6. In response to this recommendation, DASA:

¹ Ref A, Recommendation 2 refers.



- a. reviewed DASR ARO.100 against other selected MAA and EMAR-based DASR compliance confirmation requirements *during* DASR changes, WRT the issuance and retention of organisational authorisations
- b. reviewed the approach DASA applied to assessing Defence Aviation Safety community compliance with initial and ongoing changes to Flight Operations and Cross Regulatory DASR
- c. consulted MAOs on extant DASR ARO.100 requirements, expectations and challenges.

PROPOSED AMENDMENT

7. This NPA forms part of the stakeholder consultation process on the proposed DASR changes, with the proposed DASR in Enc 1.

Implementation Strategy

8. DASA is planning to release the proposed DASR in Mar 27. Given its limited changes, MAOs will be required to comply with the amendments within three months of the publishing date—unless DASA has granted an extension. DASA-DAVNOPS will also release complementary Guidance Material and conduct webinars in advanced of, and post, DASR release.

HOW TO SUBMIT COMMENTS ON THIS NPA

Format

9. Provide responses to this NPA on the Response Sheet options included at Annex A. Submit responses by email to dasa.fltops@defence.gov.au. Hardcopies are not required.

Response Timing

10. Comments on this NPA are to be forwarded to DASA by close of business 16 Oct 26.

Additional Information

11. For additional information regarding this NPA, please contact Mr Robert Stefanovic, robert.stefanovic1@defence.gov.au.

DISPOSITION OF RESPONSES RECEIVED

12. A *Comment Response Document* will be published on the [DASA Website](#) prior to, or concurrent with DASR release. DASA will not individually acknowledge or respond to comments or submissions.

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GPCAPT
DAVNOPS
Defence Aviation Safety Authority
Tel: (03) 5131 8235

Sep 26

Annex:

- A. NPA for DCP 066/2026 Revision 0 - Response sheet.

Enclosure:

1. NPA for DCP 066/2026 Revision 0 - Proposed Changes to DASR ARO.100 *Military Air Operator Certificate*.

NPA FOR DCP 066/2026 Revision 0 Response Sheet

DASR ARO.100 *Military Air Operator Certificate*

Please forward response as an email attachment to <mailto:dasa.fltops@defence.gov.au> by COB 16 Oct 26. Response formats in MS Excel (preferred) and MS Word can be found at Obj Id: [BP34901852](#) and [BO3960659](#) respectively, or alternatively please 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: (ie 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 (both direct and indirect effects, eg for Units and contracted organisations)	
Resource implications – Proposal sustainment (both direct and indirect effects, eg for Units and contracted organisations)	

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 []

NPA FOR DASR CHANGE PROPOSAL (DCP) 0066 REVISION 0
PROPOSED DASR ARO.100 CHANGES
MILITARY AIR OPERATOR CERTIFICATE (MAOC)

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Section 1: New DASR ARO.100 Part only

Section 2: New DASR ARO.100 Part, Acceptable Means of Compliance (AMC) and Guidance Material (GM)

SECTION 1: NEW DASR ARO.100 PART ONLY

Additions/modifications to the extant DASR ARO.100 **highlighted**, or where deleted **crossed-out**.

ARO.100 – MILITARY AIR OPERATOR CERTIFICATE (MAOC)

► GM

- (a) Operation of all Defence registered Aircraft must be conducted under the authority of a Military Air Operator Certificate (MAOC), issued by the Authority. ► GM
- (b) Operation of civil registered Aircraft by a MAO must be conducted under the authority of a MAOC, issued by the Authority. ► GM
- (c) The applicant organisation must apply to the Authority, by submitting a Military Air Operator's Operations Compliance Statement (OCS):
 - 1. for issue of, or a variation to, a MAOC
 - 2. for issue of, or a variation to the Operations Specification (OpSpec) attached to a MAOC
 - 3. reflecting regulatory changes into MAO OIP, before the published transition period of each major regulatory change expires. ► AMC ► GM
- (d) The OCS must: ► AMC ► GM
 - 1. include the following information:
 - i. the MAO organisation name
 - ii. the location of the MAO headquarters
 - iii. a statement that operations will be in accordance with the attached OpSpec
 - iv. Accountable Manager (AM)
 - v. Continuing Airworthiness Manager (CAM)
 - vi. Hazard Tracking Authority (HTA)
 - vii. all Aircraft **T**ypes operated by the MAO
 - viii. Aircraft roles in accordance with SOIU CRE
 - ix. specific approvals requested for Aircraft operated by the MAO
 - 2. identify reference to an approved SOIU for each Aircraft **T**ype operated
 - 3. provide a summary of the status of each element of the Flying Management System required by [DASR ORO.10](#)
 - 4. identify the availability and method of document control for MAO OIP and single Service OIP, necessary to safely conduct Flight Operations

5. identify the approval status of training and qualification requirements necessary for personnel to support Flight Operations in the required CRE
 6. identify the approval status of FSTD requirements necessary to support flying operations in the required CRE
 7. confirm suitable and competent personnel to support Flight Operations
 8. confirm suitable operations facilities and buildings are available for use
 9. utilise a Quality Management System (QMS) to achieve consistency, continuity and compliance of safe operations—through quality planning, quality assurance, quality control and quality improvement ▶ **AMC** ▶ **GM**
 10. identify that the MAO can satisfactorily maintain the Airworthiness of Aircraft Types listed on the certificate through a Continuing Airworthiness Management Organisation (CAMO)
 11. demonstrate how the MAO will comply with DASR relevant to the operation.
 12. include a DASR compliance attestation by the AM that.
 - i. the AM is accountable for the organisation's compliance with DASR
 - ii. the OCS is complete and correct
 - iii. appropriate arrangements are in place to support the scope of Flight Operations contained in the OpSpec.
- (e) An air operator must establish and maintain a Safety Management System (SMS), in accordance with [DASR SMS](#).

SECTION 2: NEW DASR ARO.100 PART, AMC and GM

Additions/modifications to extant DASR ARO.100 **highlighted**, or where deleted **crossed-out**. **AMC** in purple text. **GM** in brown text. (**Note:** Regulation 'twisties' expanded only where changes have been made).

ARO.100 – MILITARY AIR OPERATOR CERTIFICATE (MAOC)

► GM

- (a) Operation of all Defence registered Aircraft must be conducted under the authority of a Military Air Operator Certificate (MAOC), issued by the Authority. ► GM
- (b) Operation of civil registered aircraft by a MAO must be conducted under the authority of a MAOC, issued by the Authority. ► GM
- (c) The applicant organisation must apply to the Authority, by submitting a Military Air Operator's Operations Compliance Statement (OCS):
 - 1. for issue of, or a variation to, a MAOC
 - 2. for issue of, or a variation to the Operations Specification (OpSpec) attached to a MAOC
 - 3. reflecting regulatory changes into MAO OIP, before the published transition period of each major regulatory change expires. ▼ AMC ▼ GM

AMC ARO.100(c)3 – OCS updates due to regulatory change (AUS)

- a. An updated MAO OCS must be provided for all regulatory changes (from the following DASR regulation groups) defined as 'major' in the respective *DASR Release Notification of Change* document published on the DASA website on the date of DASR release:
 - i. Flight Operations
 - ii. Aviation Services and Facilities
 - iii. Cross Regulatory Requirements.

GM ARO.100(c)3 – OCS updates due to regulatory change (AUS)

- a. The regulatory transition period is defined in the respective *DASR Release Notification of Change* document published on the DASA website on the date of DASR release.
- b. MAOs should allow sufficient time for DASA to assess updated OIP for compliance to updated regulatory requirements before the regulatory transition period expires.

(d) The OCS must: ▼ **AMC** ► **GM**

AMC ARO.100(d) – Preparation of an Operations Compliance Statement (OCS)

- a. The OCS should include the following information for the MAOC:
 - i. **MAO organisation name.** FEG or equivalent
 - ii. **MAO location.** Location of the headquarters
 - iii. a statement that operations will be in accordance with the attached OpSpec.
- b. The OCS should include the following information for the MAOC OpSpec:
 - i. the Accountable Manager (AM), listed by command position, eg 'CDR ACG'
 - ii. Continuing Airworthiness Manager (CAM)
 - iii. Hazard Tracking Authority (HTA) within the MAO
 - iv. safety manager within the MAO (per [DASA SMS](#))
 - v. Aircraft type(s), as follows:
 - (a) Defence registered Aircraft listed by type, eg **A-38 ARH Tiger** **A-64 - AH-64E Apache**. Each Aircraft type is considered as a fleet. Aircraft types further divided into sub-fleets with different CRE, should be listed separately
 - (b) Civil registered Aircraft as required by [DASR ARO.100\(b\)](#). Where the Aircraft or fleet is primarily operated by Defence, it should be listed on the OpSpec. Aircraft operated under [DASR NDR](#) are not contained in the OpSpec or regulated under [DASR ARO.100](#)
 - (c) UAS including Defence registered and non-Defence registered. For non-Defence registered UAS, there should be reference to a UASOP, or register for Specific Type B and Open category
 - vi. Aircraft roles in accordance with SOIU CRE
 - vii. specific approvals requested for particular Aircraft type(s), or for all types operated by the MAO (eg RNAV or RVSM).

Flight Operations

- c. The OCS should demonstrate that the MAO can safely conduct Flight Operations, including the following aspects:
 - i. **SOIU.** Identify reference to an approved SOIU for each Aircraft type operated

- ii. **Flying Management System.** Provide a summary of the status of each element of the flying management system required by [DASR ORO.10](#) - Flying Management System
- iii. **Orders, Instructions and Publications.** Identify the availability and method of document control for MAO OIP and single Service OIP, eg Air Command SIs, necessary to safely conduct Flight Operations
- iv. **Training and qualification requirements.** Identify the approval status of training and qualification requirements necessary for personnel to support Flight Operations in the required CRE
- v. **Flight Simulation Training Device.** Identify the approval status of FSTD requirements necessary to support Flight Operations in the required CRE
- vi. **Personnel.** Confirm suitable and competent personnel to support Flight Operations
- vii. **Operations facilities.** Confirm suitable operations facilities and buildings (**NOTE:** maintenance facilities and hangars are included under [DASR M](#) or [DASR 145](#) compliance).

Continuing Airworthiness

- d. The submission for a MAOC should identify that the MAO can satisfactorily maintain the airworthiness of the Aircraft types listed on the certificate through a CAMO. The CAMO will utilise and oversee services of authorised [DASR 21](#) and [DASR 145](#) organisations, and will:
 - i. engage Military Design Organisation Approval (MDOA) holders under [DASR 21 Subpart J](#) for design services as required
 - ii. engage the Military Type Certificate holder for any matters that impact the Aircraft's type design and type certification under MTC, MRTC or an individual Aircraft's Certificate of Airworthiness (CoA)
 - iii. task Approved Maintenance Organisations (AMO) under [DASR 145](#) to maintain products (Aircraft, engines and propellers), parts and appliances
 - iv. Certified CAMOs will already have submitted an exposition and be authorised by the Authority. The OCS need only refer to that authorisation and the appointed CAM.

Compliance with DASR

- e. The OCS should demonstrate how the MAO will meet DASR in accordance with:
 - i. [DASR GR.15](#)
 - ii. [DASR GR.20](#)
 - iii. [DASR GR.25](#)
 - iv. [DASR GR.30](#)
 - v. [DASR SMS](#).

Accountable Manager attestation and signature

- f. The AM **must** make the following **DASR compliance attestations** and sign the OCS:

*I am accountable for [insert organisation]'s **continuous** compliance with the Defence Aviation Safety Regulation.*

This Operations Compliance Statement for a Military Air Operator Certificate and Operations Specification is complete and correct.

*I am satisfied that appropriate arrangements are in place to meet, **and to continue meeting**, the Defence Aviation Safety Regulation and support the scope of Flight Operations contained in the Operations Specification.*

1. include the following information:
 - i. the MAO organisation name
 - ii. the location of the MAO headquarters
 - iii. a statement that operations will be in accordance with the attached OpSpec
 - iv. Accountable Manager (AM)
 - v. Continuing Airworthiness Manager (CAM)
 - vi. Hazard Tracking Authority (HTA)
 - vii. all Aircraft **T**ypes operated by the MAO
 - viii. Aircraft roles in accordance with SOIU CRE
 - ix. specific approvals requested for Aircraft operated by the MAO
2. identify reference to an approved SOIU for each Aircraft **T**ype operated
3. provide a summary of the status of each element of the Flying Management System required by [DASR ORO.10](#)
4. identify the availability and method of document control for MAO OIP and single Service OIP, necessary to safely conduct Flight Operations
5. identify the approval status of training and qualification requirements necessary for personnel to support Flight Operations in the required CRE
6. Identify the approval status of FSTD requirements necessary to support flying operations in the required CRE
7. confirm suitable and competent personnel to support Flight Operations
8. confirm suitable operations facilities and buildings are available for use
9. utilise a Quality Management System (QMS) to achieve consistency, continuity and compliance of safe operations—through quality planning, quality assurance, quality control and quality improvement ▶ **AMC** ▶ **GM**
10. identify that the MAO can satisfactorily maintain the Airworthiness of Aircraft **T**ypes listed on the certificate through a Continuing Airworthiness Management Organisation (CAMO)

11. demonstrate how the MAO will comply with DASR relevant to the operation.
 12. include a DASR compliance attestation by the AM that.
 - i. the AM is accountable for the organisation's compliance with DASR
 - ii. the OCS is complete and correct
 - iii. appropriate arrangements are in place to support the scope of Flight Operations contained in the OpSpec.
- (e) An air operator must establish and maintain a Safety Management System (SMS), in accordance with [DASR SMS](#).