



**DEFENCE AVIATION SAFETY AUTHORITY**  
**COMMENT RESPONSE DOCUMENT TO**  
**NPA 2021/18 – DASR ACD AIR CARGO DELIVERY**

## INTRODUCTION

1. **General.** This Comment Response Document (CRD) summarises DASA's agreed regulation changes as a result of the Notice of Proposed DASR Amendment (NPA) process to NPA 2021/018, and finalises public consultation on the NPA. DASA will consider arguments opposing the views expressed in this CRD only in exceptional circumstances. Any member of the regulated community having arguments to support an appeal against the decisions documented in this CRD may petition DASA.

2. **Background.** DASA released NPA 2021/018 (*DASR ACD Air Cargo Delivery*) for regulated community comment on 24 Jun 22. The period for public comment closed on 20 Jul 22. DASA subsequently consulted with each environmental command HQ and prospective Air Cargo Delivery Service Providers (ACDSPs) to ensure DASA responses to NPA feedback were acceptable.

## ANALYSIS OF COMMENTS

### General

3. DASA received 158 comments in response to NPA 2021/018. The comments are individually listed in Annex A together with their corresponding DASA responses.

### Environmental command endorsement positions

4. Environmental command HQs provided endorsement to NPA 2021/018 as follows:

- a. HQFAA and HQ AVNCOMD accepted the proposal without change
- b. HQAC advised the proposal was acceptable, but would be improved if changes defined in Annex A were made.

5. **DASA response.** The majority of feedback has been accepted and incorporated into the revised regulation. DASA forwarded the revised draft back to each environmental command HQ, and received subsequent endorsement.

### Environmental command resource implications

6. HQAC advised there will be some initial resource implications to implement the revised regulation and achieve the ACDSP certifications necessary. HQFAA and HQ AVNCOMD did not advise any resource impact.

7. **Transition plan.** DASA has incorporated a transition plan with the update to DASR ACD. In this plan, DASA will provide a 12 month transition period, commencing on the date of publication of DASR ACD. This transition period will allow the regulated community to make changes to their existing management systems, and where necessary, apply for ACDSP

certification. DASA will not enforce compliance with any new requirements introduced by the revised DASR ACD when conducting oversight activity during the transition period. DASA will consider extensions to the transition period on request.

### **AUTHORITY**

8. The content of this Comments Response Document is authorised.

**C Pouncey**

WGCDR

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15 Sep 22

**Annex:**

- A. NPA 2021/018: DASR ACD *Air Cargo Delivery* – Regulated Community Feedback

## NPA 2021/018: DASR ACD AIR CARGO DELIVERY– REGULATED COMMUNITY FEEDBACK

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
1.	GM1 ACD.20(a) g. - ACDSP certificate content (AUS)	DG DASA	Remove the GM dealing with Independent Boards of Review (IBOR). Policy relating to IBOR is DASPMAN content.	DG DASA is the Authority for ACDSP applicants and the corresponding certificates. Where necessary, DG DASA may seek to engage the Def AA through an AwB. This requirement does not need to be embedded in the regulation.	DASA removed GM1 ACD.20(a). g.
2.	ACD.10.(b) GM	CSG	A deployed and/or force assigned clarification may need to be included in GM	Acknowledge that Air Movement Sections (AMS) must be operating under ACDSP and likely to be under CSG ACDSP Certificate. When the ALT or MALT is forced assigned to another formation (i.e. deployed), is a separate ACDSP certificate required for the JTF HQ.	DASA incorporated the following additional guidance ICW DLC CSG.  <i>In cases where an ALT or MALT is force assigned, ACD operations may occur under the parent unit's ACDSP Certificate, or under an ACDSP Certificate issued to the relevant JTF HQ. The determination as to the appropriate ACDSP Certificate holder will be dependent on the command and control arrangements, length of deployments, deployment preparation period and efficiency of service provision oversight. The determination as to the appropriate ACDSP Certificate holder is a command decision.</i>

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3.	ACD.20 ACDSP Certificate	CSG	What command level is appropriate for Accountable Manager and Hazard Tracking Authority?	The IR and GM implied FEG level command as Accountable Manager but does not specify it. (It is covered under ACD.30.(a) but as an AMC not IR or GM).	<p>DASA consulted the following response with DLC CSG:</p> <p><b><i>DASR Glossary Definition - Accountable Manager:</i></b> 'Person designated by the Approved Organisation, and identified in the Organisation Exposition or Compliance Statement, who is accountable for maintaining safety standards required by relevant DASR and any additional standards specified. Typically, this is a key figure who has influence within the organisation and the ability to make appropriate resource decisions.'</p> <p><b><i>DASR Glossary Definition - Hazard Tracking Authority.</i></b> 'An appointment or appointments – made by the appropriate Force Element Group (FEG) commanders or Navy and Army equivalents - responsible for tracking actions and recommendations from FEG aviation safety reports to completion</p> <p>While a FEG commander will intuitively be appropriate as an AM within a FEG, it could be a different rank level in other organisations dependant on structure, span of control, command and control arrangements and ability to directly control resources.</p> <p>By definition, the HTA is appointed by FEG commanders. Therefore, the HTA may be at a rank level determined by the FEG commander.</p> <p>Typically the AM is a FEGCDR. Typically the HTA is an O6.</p>
4.	[GM] ACD.20.(a). 1	CSG	Suggest to include ACD Service Capacity as part of the Service Provision Conditions (SPC) or Operational Limitations.	This is similar to [a] Statement of Intent and Usage (SOIU) which prescribes the baseline for the service, capacity, and usage of the ACD.	<p>DASA amended GM ACD.20(a).1 ICW DLC CSG as follows:</p> <p><i>...ACD services provided (including ACD service capacity, which baselines the service, capacity, and usage of the ACDSP)...</i></p>

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5.	ACD.30. Organisation Structure	CSG	Suggested ACD.30.(a).1. the authority, duties and responsibilities of all personnel performing ACDSP functions, including the management personnel responsible for safety and quality management functions	In-Charge implies a command relationship and leadership role(s). Management of personnel may be in Staff and/or supporting roles hence recommending using "responsible for Safety and Quality management"	DASA amended 'ACD.30.(a).1 ICW DLC CSG as follows:  <i>...the authority, duties and responsibilities of all personnel performing ACDSP functions, including the management personnel responsible for safety and quality management functions..</i>
6.	ACD.30.(a). GM	CSG	Refer to explanation	Majority of the ADE Maintenance and engineering personnel resides outside of the ACDSP organisation (i.e. CASG), should this be defined in the ACD organisational structure? Suggest adding guidance material specific to "ACD.30.(a).3: formal relationship with all other contributors to the service provision" to clarify requirement for extra-organisational structure requirements.	Yes, an ACDSP should list Key Staff (including engineering and maintenance appointments which contribute to the safe operation of an aviation system) in their organisation structure. Where those Key Staff are employed in organisations external to the military unit which forms the core of the ACDSP, then the ACDSP must also define the formal relationships with those organisations in which the Key Staff are employed (other contributors to the service provision that may directly influence the safety of ACD services).  ACD.30(a)3 requires ACDSP organisations to define all formal relationships with all contributors to the service provision. This is to define the external inputs to their ACD service provision that can influence the quality of the services provided. The ACDSP CS should refer to MOUs or other formal agreements in place.  DASA added GM2 ACD.30(a) to that effect.  Consulted with DLC CSG

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7.	ACD.30.(a). AMC	CSG	Refer to explanation	ACD.30.(a) AMC a.iii and iv basically describes a "ACD competency framework" which is extensive covered under ACD.80	DASA has not amended the AMC. As part of AMC ACD.30.(a).iii and iv the organisation is required to describe the type and number of personnel required, and the competencies required of those personnel to provide the ACD services expected. This is normal when describing organisational structures. Under ACD.80 (a) and its corresponding AMC and GM, a competency management system needs to be established to ensure that ACD personnel are trained appropriately and maintain their competencies while providing those ACD services.  Consulted with DLC CSG
8.	ACD.60.(a) GM, AMC, AMC1 & AMC2	CSG	Acceptable without changes (refer to comments in explanation)	At point vi. It is implied that the captain of aircraft is responsible to assess the suitability for flight assisted by the contingency plans contained within the operations manual. The ACDSP will need to be included in the decision loop to ensure the MAO is making an informed/balanced decision taking into consideration the operational imperative.	DASA does not seek to prescribe the consultation required between the ACDSP, MAO or other stakeholders in developing such contingency plans.  However, the Aircraft Captain retains responsibility for Suitability For Flight for their Aircraft. So, there is a requirement for ACDSP personnel to ensure the Aircraft Captain is informed of any abnormal or emergency situation—to enable the Aircraft Captain to make sound Suitability For Flight decisions.  DASA added the following AMC accordingly:  <i>Note: The Aircraft Captain retains responsibility for Suitability For Flight for their Aircraft. So, there is a requirement for ACDSP personnel to ensure the Aircraft Captain is informed of any abnormal or emergency situation—to enable the Aircraft Captain to make sound Suitability For Flight decisions. ACDSP and MAOs conducting ACD must explicitly include this obligation (in ACD operations manuals) on all personnel to inform the Aircraft Captain of abnormal and emergency situations.</i>  Additionally, DASA included 'unloading' in ACD.60 to align the scope of the operations manual with the updated ACD definition in the DASR Glossary  Consulted with DLC CSG
9.	ACD.60.(a). 3 AMC	CSG	a.ii DG anomalies and incidents are reported via Aviation Safety Report.	ensure reporting is captured via the appropriate system.	DASA amended AMC1 ACD.60(a).3 accordingly.

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10.	Sect 1 Para 3	CSG	Consider including a definition for Dangerous Goods (DG).	A definition for Dangerous Goods (DG) will supplement the other definitions, and provide background/ context for the special management and handling precautions required for DG.	DASA has not incorporated the suggested change. The DG definition is in the extant DADR Glossary.

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11.	ACD.60 (d)	CSG	It is unclear what this sub-paragraph is attempting to achieve: "MAOs that utilise ACD services must utilise on-board emergency procedures for the ACD load types defined at DASA ACD.60(a)."	1. MAOs are not the only organisations or individuals (ie: customers) that 'utilise' ACD services. 2. A customer that 'utilises' ACD services may have no control over the use of emergency on-board procedures. 3. Should the sub-paragraph state "MAOs that provide ACD services must ....."? 4. This sub-paragraph should be re-written to remove ambiguity .	<p>DASA amended DASR ACD.60(d) as follows:</p> <p><i>MAOs and Sponsors that utilise ACD services must utilise on-board emergency procedures for the ACD load types defined at DASR ACD.60(a).</i></p> <p>DASA added the following GM:</p> <p><i>The regulation requires MAOs and Sponsors to access and utilise on-board emergency procedures applicable to the ACD load types defined at ACD.60(a)</i></p> <p>Rationale: the regulation requires MAOs and Sponsors to access and utilise on-board emergency procedures applicable to the ACD load types defined at ACD.60(a).</p> <p>While there are other customers to ACD services who may not have control over the use of on board emergency procedures, only MAOs operate Defence Registered Aircraft. Hence, MAOs are the organisations who can utilise emergency procedures on board.</p> <p>Similarly, while some MAOs may perform ACD services organically ('provide ACD services'), this regulation requires the control of hazards (associated with ACD loads) on board the Aircraft of any MAO. Additionally, there may be circumstances where a NDR Aircraft is carrying an ACD load. Hence, DASA added 'and Sponsors' to ACD.60(d).</p> <p>Consulted with DLC CSG</p> <p>Note, DASA subsequently further amended ACD.60(d) as follows:</p> <p><i>MAOs or Sponsors must utilise on board emergency procedures when carrying the ACD load types listed at ACD 60(a).</i></p> <p>(LSN 62 refers)</p>



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12.	ACD.70 GM & AMC	CSG	pt (c) Clarification required please refer to explanation	majority of the ADE are owned and operated by CSG (AMS) and managed/supported by various SPO. Is the MAO best placed to perform defect and U/S reporting?	MAOs conducting ACD, independent of a separate ACDSP (eg a CH-47 Aircrewman preparing a load unsupported by an ALT) are responsible (as the regulated entity) under AMC ACD.70(a)c for any necessary defect reporting pertaining to the ADE that MAO is utilising to conduct that ACD activity.  Consulted with DLC CSG
13.	ACD.90 (a) Contracted ACD Services	CSG	Consider removing the word 'defined' from the statement 'contractor to comply with <i>defined</i> DASR ACD requirements'.	1. The word 'defined' may imply the DASR ACD requirements provided under the heading of 'definitions' only. 2. The word 'defined' does not add value or clarity to DASR ACD.90. 3. The word 'defined' should be removed to eliminate or minimise the potential for mis-interpretation of DASR ACD.90.	DASA deleted 'defined' from ACD.90 (a).  Additionally, DASA amended AMC ACD.90(a).i.(a) as follows:  <i>abide by the requirements of this DASR ACD regulation, to the extent applicable to the scope of the relevant 'Statement of Work' or equivalent document.</i>  Consulted with DLC CSG

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14.	ACD.60 ACD Operations Manual (AUS)	A4 HQAC	As applicable, apply IR, AMC, and/or GM statements, to facilitate operational DEVIATION to Approved/Auth orised OIP etc. - detailing risk managers, accountable managers and/or approving authorities as detailed in ACD Policy/OIPs etc. <i>'Deviation to ACD Regulations, Policies, OIP, procedures etc. may only be approved by the authorised command authority who maintains the delegation'.</i> (or words to this effect)	HQAC A4 Approved Publication Authority (i.e. AFAMMAN, AFAMDGMAN) - details AM, RMA, Responsible organisations (MAO, ACDSP) etc. and Command Clearance processes - as the authority to issue/release operational waivers/instruments as delegated.	<p>DASA has not incorporated the suggested change.</p> <p>As an outcomes-based regulation, DASR ACD refers MAOs conducting ACD and ACDSPs to AFAMMAN and AFAMDGMAN as the corporate solutions to meet regulatory requirements. AFAMMAN and AFAMDGMAN provide an extant ability for relevant authorities to approve deviation to the processes they detail.</p> <p>Where an ACDSP or MAO conducting ACD requires an exception from a regulatory requirement, then that ACDSP or MAO conducting ACD should seek approval from the relevant authority IAW GR.80 (DASA), via MPTF (DASA), MCRI (DASA) or DASR SPA.10 (MAO-AM) as appropriate. It is not convention to refer to these mechanisms for seeking exceptions to DASR requirement in IR, AMC or GM. DASA expects that this information will be included in the new Defence ACD manual for the guidance of ACDSPs and MAOs conducting ACD.</p> <p>Consulted with HQAC A4 staff</p>

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15.	General	A4 HQAC	Apply similar DEVIATION change management processes for deviation to DASR IR (as ACD.60 change comments)		LSN 14 refers.
16.	GM1 and 2 ACD.10	A9 HQAC	Move to the start of the Regulation above ACD.10, thereby applying to the whole regulation.	These are statements which apply to the whole ACD regulation. Would also remove for repetition throughout the Reg.	DASA has not incorporated the suggested change. GM must be directly tied to specific regulations, not 'floating' (the definition of GM in the DASR Glossary and the <i>Interim DASR Style Guide</i> refer).
17.	GM1 ACD.10	A9 HQAC	The title does not match the content of the GM if moved to the start of the regulation.		LSN 16 refers.

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18.	ACD.10(a) and throughout	A9 HQAC	Is certificate with or without a capital?	A Military Type Certificate, an ANSP Certificate, a MAOC are all capitalised, why wouldn't an ACDSP certificate be?	<p>Words are capitalised in DASR (words that would not otherwise be capitalised according to the rules of Grammar as detailed in the DWM) when the words are defined terms in the DASR Glossary. In the case of 'ANSP Certificate', this NPA proposes to add the definition of an ACDSP Certificate to the Glossary. Hence, ANSP Certificate should be capitalised. DASA has amended DASR ACD to consistently capitalise ANSP Certificate accordingly. Additionally, DASA has added the following definition of Service Provision Certificate (SPC) to the DASR Glossary (and accordingly, capitalised Service Provision Certificate throughout DASR ACD accordingly):</p> <p><b><i>Service Provision Conditions (SPC):</i></b> <i>An integral component of the Air Navigation Service Provider Certificate (ANSPC) or Air Cargo Delivery Service Provider Certificate (ACDSPC) that details:</i></p> <ul style="list-style-type: none"> <li><i>a. key positions</i></li> <li><i>b. the types of service the ANSP Air Navigation Service Provider (ANSP) or Air Cargo Delivery Service Provider (ACDSP) is certified to provide</i></li> <li><i>c. operating provisions.</i></li> </ul> <p><i>The complexity of the service(s) may be further detailed in separate annexes. For example, ATM services may have a separate annex for each Defence site where services are provided.</i></p>
19.	ACD.10(a)	A9 HQAC	Why isn't ACDSP certificate abbreviated in total to ACDSPC?	As per an ANSPC.	DASA amended instances of 'ACDSP Certificate' to 'ACDSPC'. DASA added ACDSPC to the DASR Acronym List.
20.	ACD.10(b)	A9 HQAC	Does an MAO 'provide' or 'conduct'?	Conducting is used in the GM.	DASA amended relevant instances of 'provide' to 'conduct'.

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21.	ACD.10(b)	A9 HQAC	Is exception now being used vice derogation?		Yes. Exception is now being used instead of derogation. The term 'derogation' is being progressively removed from DASA terminology.
22.	ACD.10(b)	A9 HQAC	Change 'organisation approval' to 'certificate' or 'Certificate'	(b) is an exception to (a), so should use the same term as (a)	DASA removed ACD.10(b) (LSN 35 refers).
23.	GM ACD.10(b)	A9 HQAC	Ack that within AMG, AMTDU are not a platform on the MAOC and so a separate ACDSPC seems appropriate. However, AMS within CSG are analogous to flying SQNs within AMG and there should therefore be no requirement for separate ACDSPCs. Why not just a single CSG ACDSPC?	There is only one ANSPC for SRG, no separate ones for each of the SQNS or Flights.	DASA confirms CSG would only require one ACDSP Certificate to cover the scope of all ACD services conducted by AMS units. To enhance clarity, DASA amended GM ACD.20(b) as follows:  '...Similarly, Air Movements Sections within CSG must operate under <del>an</del> CSG's ACDSP certificate and supporting CS'
24.	GM ACD.10(b)	A9 HQAC	What do deployed AM assets operate under?		LSN 2 refers.

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25.	GM ACD.20	A9 HQAC	Can be deleted if the suggestion to move the GM1 ACD.10 to the start of the reg is accepted. If not accepted, repeat the GM in toto to save having to go back to the start .		LSN 16 refers. DASA repeated the GM in toto.
26.	AMC ACD.20(a). b.	A9 HQAC	Use of ' <i>FEG or equivalent</i> '. Presume that if AMTDU are applying for a certificate, HQAMG is still the ACDSP? If AMTDU, then they are not equivalent to a FEG and therefore there should be a different term used here. The name of the unit or organisation accountable for the ACDSP, typically the FEG Headquarters.	Follow-on question depending on answer to comment re applicant. If HQAMG aren't the applicant then can AMTDU have an AM, HTA, etc outside the organisation?	<p>The determination of which unit will be the ACDSPC holder is a matter for command. Typically in Defence aviation, the Accountable Manager is the FEGCDR, and the approved organisation (eg MAO) is the FEG. However, the DASR does not prescribe the level at which an organisational approval must be held—eg in Army, the MAO-AM is COMD AVNCOMD. Should AMG determine that they wish to pursue for AMTDU to hold the ACDSPC, then provided the regulatory requirements are met, this regulation does not exclude the option of AMTDU holding the relevant ACDSPC. Likewise, the regulation allows for AMG to hold the ACDSPC under which AMTDU conducts ACD. The phrase 'FEG or equivalent' is common to the Compliance Statements under the proposed AMC ACD.20(a), AMC ANSP.20.A and AMC ARO.100C.</p> <p>Consulted with DD OPAW HQAC</p>

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27.	AMC ACD.20(a). a.ii	A9 HQAC	Delete ' <i>likely</i> '.	This is far too broad.	DASA has incorporated the suggested change.
28.	AMC ACD.20(a). a.ii	A9 HQAC	What is the purpose of nominating all permanent locations?	Should there be reference to ACD services provided in locations other than specified permanent locations, ie deployments, tasking and exercises?	<p>The disclosure of permanent locations is required to ensure that the ACDSP and DASA can better monitor the potential effects of organisation resource pressures on the maintenance of ACD services to the appropriate quality and safety standards across geographically dispersed locations.</p> <p>Permanent locations can include long term deployments if it is likely that these could affect ACD resources.</p> <p>Consulted with DD OPAW HQAC</p>

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29.	GM1 ACD.20(a)	A9 HQAC	This GM appears to be in the wrong place per its title, and has random content. Title, contents and location should be modified: Subparas a to d should be GM to ACD.20(a).1 as they are all about what a ACDSPC is. Subpara e and f should be GM to ACD.20(a).2 as they relate to re-issue, variation or addition. Subpara g is out-of-place and discussed further in a separate comment below. Subpara h is valuable and could be in a GM which is relevant to the provision of information for a CS, or included in the DASPMAN.	ACD.20 is applying to DASA for a certificate. ACD.20(a) is that to apply for a certificate you need to use a CS. AMC ACD.20(a) is for preparation of the CS, GM1 is all about the content and use of an ACDSPC and attached SPC (abbreviations getting messy), nothing to do with the CS.	<p>DASA incorporated the suggested change by moving GM1 ACD.20 (a) under ACD.20(a) 1. This new GM is now referenced as GM ACD.20(a)1.</p> <p>Additionally, DASA moved sub-para e to f under ACD.20(a)2.</p> <p>DASA removed sub-para g. as per LSN 1.</p> <p>DASA retained, at GM1 ACD20.(a), the GM clause originally detailed at para h, dealing with 'Provision of evidence' (for the preparation of compliance statements (CS)), and modified it as follows:</p> <p><i>...Provision of evidence. Organisations should make use of existing data and documents to satisfy DASR ACD.20(a), rather than creating unique documents with no enduring value once the certificate is issued.</i></p>



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30.	GM1 ACD.20(a).g	A9 HQAC	<p>As above, out of place and irrelevant to the point of this GM.</p> <p>Notwithstanding , 'DASA may use an independent board of review ...'. Is this an IBR IAW DASR.ARO.80 (namely an AwB)?</p> <p>Inference in the statement is that DASA will conduct IBRs, but ARO.80 IBRs are conducted by the DefAA.</p> <p>If it is to be maintained somewhere, this para should be rewritten to reflect that IBRs per DASR.ARO.80 may be utilised by the DefAA.</p> <p>A separate para should detail elsewhere what oversight and audit DASA are going to conduct if that is considered necessary.</p>	<p>The use of 'the Authority' in DASR ARO.80 means the Defence Airworthiness Authority, not DASA as it has tended to become within the wider DASR over time.</p>	<p>LSN 1 refers.</p>

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31.	Figure 1 GM2 ACD.20(a)	A9 HQAC	Is the figure enough of a description of what the scope of ACD services provided is? These are the methods of ACD and what is carried, rather than the scope of services.		<p>DASA consulted this figure with all ACDSP. While the figure defines the ACD environment (ie methods of ACD), it implicitly covers the services required to deliver ACD by inviting the reader to consider what policy and procedures exist in each ACD element (as defined by AMC ACD.60 (a)ai)</p> <p>DASA amended GM2 ACD.20(a) as follows:</p> <p><i>The scope of ACD services may include services associated with the loading (including the preparation, composition, configuration, placement and restraint) of air cargo, whatever it may be (including Passengers, freight, paratroopers, animals and EO materials) and the subsequent unloading of that air cargo. ACD services may also include (where an ACDSPC is approved to do so) the design, development and approval of procedures for loading and unloading cargo. Figure 1, below, depicts the Defence ACD environment, in which ACD services may be provided—showing that ACD services may be in support of Passengers or Internal or External loads of General (Standard) Cargo or Non –Standard Cargo via Airland, Airdrop, or External Lift..</i></p> <p>Consulted with DD OPAW HQAC</p>
32.	Figure 1 GM2 ACD.20(a)- 2	A9 HQAC	What is ADE?		<p>DASA amended the definition of Aerial Delivery Equipment to include the acronym 'ADE' as follows:</p> <p><b><i>Aerial Delivery Equipment (ADE).</i></b> <i>Equipment employed on transport or rotary wing Aircraft in the aerial delivery of material; including slings, platforms, containers, parachutes, rigging materials, cloths, cords, tapes, threads and webbing (Note: Aerial delivery equipment does not include equipment employed in the aerial delivery of personnel).</i></p> <p>Further, DASA added the acronym 'ADE' to the DASR Acronym List.</p>

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33.	Figure GM2 ACD.20(a)	A9 HQAC	The inclusion of the US FAA Special Cargo within Non standard cargo does not fit with the definition being added to the glossary.	Per the definitions for gen and non std cargo being added to the glossary, either of these types of cargo could be FAA Special cargo.	<p>DASA removed reference to 'US FAA Special Cargo' from Figure GM2 ACD.20(a).</p> <p>Additionally, DASA amended the definition of Non-Standard Cargo to be mutually exclusive with the extant AFAMMAN Standard Cargo definition, as follows:</p> <p><i>Non-Standard Cargo is cargo that requires special handling, additional precautions or specific procedures developed for either its preparation, composition, configuration, loading, placement, restraint or unloading. Non-standard cargo includes Dangerous Goods, security-protected consignments, service weapons, safe hand, human remains, unaccompanied personal effects, live animals, mail, perishables, and unserviceable or crashed Aircraft. Non –Standard Cargo also includes the following, where special handling, additional precautions or specific procedures are required:</i></p> <p><i>a. cargo that is not contained in a unit load device or pallet certified for the aircraft cargo loading system</i></p> <p><i>b. cargo requiring attachment directly to the aircraft floor.</i></p> <p>The current AFAMMAN definition does not adequately describe those items that require additional precautions or procedures to be loaded and carried on-board, such as those defined as 'special cargo' in the FAA AC. DASA included mutually exclusive definitions for load types so there is no confusion as to which regulations are relevant and applicable.</p> <p>Further, DASA added 'loading' to the other instances of 'preparation, composition, placement, restraint or unloading' in DASR ACD and in DASR Glossary entries related to DASR ACD.</p> <p>Consulted with A4 staff, DD OPAW HQAC and CENGR AMTDU</p>
34.	ACD.20(a). 2	A9 HQAC	change text to 'reissue, variation or addition' vice 'variation'		<p>DASA amended ACD.20(a)2 as follows:</p> <p><i>reissue of, or variation to, an ACDSPC, or attached SPC</i></p> <p>Consulted with DD OPAW HQAC</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
35.	ACD.20(b)	A9 HQAC	Is this required; has ACD.10(b) not already stated this? If it must be retained, suggest be re-written as: 'As an exception from DASA ACD.20(a), and DASA ACD.10(a), a MAO that provides an ACD capability must reflect the scope of ACD services provided IAW DASA ACD.'		<p>Yes, DASA ACD.20(b) is required in order to except MAOs conducting ACD from the requirements of DASA ACD 20( a). DASA deleted DASA ACD.10(b) and incorporated its effect into DASA ACD,20(b) as follows:</p> <p><i>As an exception from DASA ACD.10(a) and DASA ACD.20(a), a MAO that conducts ACD does not require a separate ACDSPEC or SPC. However, the MAO Operational Specification (OPSPEC) and CS must reflect the scope of ACD services provided IAW DASA ACD.</i></p> <p>DASA restructured the associated GM accordingly.</p>
36.	ACD.20(b)	A9 HQAC	Per comment for ACD.10(b), does an MAO 'provide' or 'conduct'?		LSN 20 refers.
37.	ACD.20(b)	A9 HQAC	Include a GM per that for ACD.10(b).		LSN 35 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
38.	ACD.30, AMC & GM ACD.30(a)	A9 HQAC	Organisational or Organisation? GM ACD.30(a) and ANSP.30 uses the title 'Organisational Structure'.	Other instances in regulation will require amendment depending on outcome.	DASA replaced all applicable instances of 'organisation' with 'organisational'.
39.	ACD.30(a)	A9 HQAC	Should there be indication as to how the structure is defined, ie in what artefacts?	The AMC says what a structure should include, but no suggestion of how it is defined.	No, there should not be an indication as to how the structure is defined. Additional guidance is not necessary. DASA provides outcome based regulation IAW the <i>Interim DASR Style Guide</i> . Creating artefacts to meet the requirements of DASR is a matter for command. The AMC details the necessary elements of the organisation structure to support the regulatory hazard control.  Consulted with DD OPAW HQAC A9
40.	AMC ACD.30(a). a.v	A9 HQAC	Suggested rewording: v. facilities used for the type of ACD services provided	Are facilities part of an organisation's structure? Who makes the determination that facilities are sufficient and suitable?	DASA has amended AMC ACD.30(a).a.v as follows:  '...facilities that are sufficient and suitable for the type of ACD services provided' (LSN 102 refers)  Organisational structures implicitly place demands on the facilities required by staff to meet organisational objectives. Therefore, the facilities should be allocated and organised such that services can be safely provided.  DASA makes the determination (in approving the ACDSPC) that the facilities are sufficient and suitable, based on the Accountable Manager's (AM's) attestation. The AM's attestation (as required by AMC.....) certifies that the appropriate facilities have been provided to safely deliver the services expected.  Consulted with DD OPAW HQAC A9

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
41.	GM ACD.30(a). a	A9 HQAC	As per previous comments for GM ACD.20: Can be deleted if the suggestion to move the GM1 ACD.10 to the start of the reg is accepted. If not accepted, repeat the GM in toto to save having to go back to the start.		LSN 25 refers.
42.	GM ACD.30(a). b	A9 HQAC	GM for ACD.30 rather than ACD.30(a)		LSN 25 refers.
43.	GM ACD.40(a)	A9 HQAC	As per previous comments for GM ACD.20: Can be deleted if the suggestion to move the GM1 ACD.10 to the start of the reg is accepted. If not accepted, repeat the GM in toto to save having to go back to the start.		LSN 25 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
44.	GM1 ACD.50(a)	A9 HQAC	As per previous comments for GM ACD.20: Can be deleted if the suggestion to move the GM1 ACD.10 to the start of the reg is accepted. If not accepted, repeat the GM in toto to save having to go back to the start.		LSN 25 refers.
45.	GM2 ACD.50(a).i and ii	A9 HQAC	Delete ASIRs; only need to have ASRs in the list.	ASIRs are a type of ASR.	<p>DASA notes the unresolved dissenting view from DD OPAW HQAC A9.</p> <p>DASA has not incorporated the suggested change. An Aviation Safety Report (ASR) is distinct from an Aviation Safety Investigation Report (ASIR). IAW the DASM, an ASR must be raised:</p> <p><i>for all aviation safety events... Any personnel in Defence aviation who are involved in, witness, or are notified of an aviation safety event or issue as defined above, must ensure an ASR is initiated in Sentinel.</i></p> <p>Whereas, an ASIR is the output of an Aviation Safety Investigation Team (ASIT):</p> <p><i>All Defence Aviation Class A and select Class B events are independently investigated by a DFSB ASIT which reports directly to the Appointing Authority. The ASIT operates under the procedural direction of DFSB. In the case of Class B events, DFSB may decide to not undertake the investigation, leaving the responsibility to the command chain.</i></p> <p>ASIRs are available, once released, on the DASA website.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
46.	GM ACD.60	A9 HQAC	As per previous comments for GM ACD.20: Can be deleted if the suggestion to move the GM1 ACD.10 to the start of the reg is accepted. If not accepted, repeat the GM in toto to save having to go back to the start.		LSN 25 refers.



LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
47.	AMC ACD.60(a). a.i	A9 HQAC	It is possible that the AFAMMAN and AFAMDGMAN may change names following a planned review of the content and structure. Recommend revised wording that would permit possible name changes. Potential wording may detail ACD Manuals as specified by ACAUST or the environmental commanders.		<p>Yes, there is a possibility the document names will change.</p> <p>DASA has not incorporated the recommended change. DASA will confirm the document titles with HQ AC A4 prior to release of DASR ACD. DASA refers to the AFAMMAN or AFAMDGMAN by title to ensure clarity to the regulated community. Should the AFAMMAN or AFAMDGMAN subsequently change titles DASA will update the regulation as a minor change.</p> <p>Consulted with DD OPAW HQAC A9</p>
48.	GM ACD.60(a)	A9 HQAC	Better as GM ACD.60?		DASA has not incorporated the suggested change. DASA retained GM ACD.60(a) in its current location as it is directly linked to ACD.60(a).
49.	AMC ACD.60(a). a.vi	A9 HQAC	This is more like content and therefore part of AMC .60(a).b.		DASA amended the regulation accordingly.
50.	AMC ACD.60(a). b	A9 HQAC	Define? Detail or include.		DASA amended AMC ACD.60(a)b to use the word 'detail', in lieu of 'define'.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
51.	AMC ACD.60(a).b.iii	A9 HQAC	<p>1. These are two separate issues and should be split apart, or the Suitability For Flight (SFF) comment removed as the requirement for inclusion is also at ACD.60(b).</p> <p>2. Handovers aren't always going to be cut and dried. What if the LM is the ACDSP because he is operating with no other support?</p>		<p>1. DASA has not incorporated the suggestion. AMC ACD.60(a).b.iii identifies the cases where handovers between Aircrew and ACDSPs are required (including the conduct of Suitability For Flight (SFF) assessments). ACD.60(b) defines the requirements for the SFF assessments.</p> <p>2. In a scenario when loading Aircraft unsupported by ALTs, independence may be provided by other Aircrew members (akin to unsupported maintenance where one Aircrew member eg FLTENG may have been authorised to perform Self-Supervising Tradesman duties and the Aircraft Captain was authorised as the Independent Inspector). When on unsupported operations, the hand-over requirements are not applicable. However, Flight Crew are required to still conduct a SFF assessment.</p> <p>After consultation with DD OPAW HQA9, DASA amended DASR ACD 60(b) and its associated AMC (to provide clarity on the requirements of a SFF assessment), as follows:</p> <p><i>(b) ACD operations manuals must be easily accessible by relevant personnel and must detail procedures to ensure Suitability For Flight (as relevant to the ACD load) for Defence Aircraft.</i></p> <p><i>AMC ACD.60(b) – Procedures to ensure Suitability For Flight (as relevant to the ACD load) (AUS).</i></p> <p><i>a. Procedures to ensure Suitability For Flight (as relevant to the ACD load) include:</i></p> <p><i>i. confirming:</i></p> <p><i>(a) Aircraft weight and balance is within limits defined in approved OIP</i></p> <p><i>(b) the weight and balance limits will remain acceptable throughout the Flight</i></p> <p><i>(c) General Cargo and Non-Standard Cargo is configured, placed, restrained and rigged in accordance with approved OIP</i></p> <p><i>(d) Aircraft equipment is stowed in approved positions and secured</i></p> <p><i>(e) Passengers are seated in approved seating and configuration</i></p> <p><i>(f) any consignment of Non-Standard Cargo classed as DG has been managed in accordance with approved OIP</i></p> <p><i>(g) independent checks of payload preparation, composition, configuration, placement and restraint have been conducted against the requirements of DASR ACD</i></p> <p><i>ii. a Suitability For Flight assessment, confirming that the procedures detailed at AMC ACD.60(b).a.i have been completed, prior to acceptance of the ACD load by the Aircrew</i></p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
52.	AMC ACD.60(a). b.ix	A9 HQAC	What about the management of items that fall outside ADE such as chains, restraint devices, nets, pallets.		LSN 145 refers.
53.	AMC1 and AMC 2 ACD.60(a)3	A9 HQAC	These AMC seem out of place. They are rules, not information on the contents requirements of an OPS manual.		AMC1 and AMC2 to ACD.60(a)3 provide limitations on the solutions which an ACDSP or MAO conducting ACD may document as content in their respective Operations Manuals. For example ' ii. DG anomalies and incidents are reported' — the requirement of this AMC is for the Operations Manual to detail how DG Anomalies are reported and when.  Consulted with DD OPAW HQAC A9
54.	AMC2 ACD.60(a)3	A9 HQAC	This should also be an AMC for ACD.60(a)2.	Also applies to Gen cargo.	DASA has not incorporated the suggested change. LSN148 Refers

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
55.	AMC2 ACD.60(a)3	A9 HQAC	What is the premise of this AMC? Is it what gives the Load Instruction development part of AMTDU it's raison d'être? or is it for more of a day-to-day consideration where an item of cargo is presented to AMS or the LM without an existing load clearance?	AMTDU publish Standard Load and Special Load (including caveated) clearances for the preparation, loading, restraint and unloading of cargo. If there is no existing instruction then the Loading and Lashing AAPs include information on the conduct of a Standard Load assessment by AMS or LM via a checklist. If it does not pass the assessment then it is an Uncleared Load and must be referred to AMTDU. The AMC would be unacceptable if it precluded the use of the Standard Load Assessment Checklist by AMS or LM.	AMC2 ACD.60(a)3 does not preclude the use of the Standard Load Assessment Checklist by an ACDSP or MAO conducting ACD (eg AMS or a Loadmaster).  AMC2 ACD.60(a)3 states 'Where no approved OIP exists...'. The Standard Load Assessment Checklist is part of 'approved OIP.'  Consulted with DD OPAW HQAC
56.	AMC2 ACD.60(a)3 .a.iii	A9 HQAC	Where did these elements come from? They don't make sense to me, but fine if they do to AMTDU. The drop copy version seemed clearer.		The requirements (or elements) have been tailored from DASR 21.A.239 to ensure that the relevant elements of an appropriate design assurance system can be included within local procedures. These requirements will be relevant to AMTDU or any other organisation that may provide load clearance solutions.  Consulted with DD OPAW HQAC A9.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
57.	ACD.60(b)	A9 HQAC	Why aren't the contingency plans direction [ACD.60(a).a.vi], or the content of ACD.60(d) here as they are all relative to SFF? Would require expansion to include a new b to cover the contingencies.		LSN 8 Refers.
58.	ACD.60(b)	A9 HQAC	Which is to be easily accessible - the manuals or the procedures? Presuming the former, then is already at AMC ACD.60(a).a.iii, although not 'easily'.		<p>Procedures are promulgated in approved manuals. Therefore, the manuals need to be easily accessible.</p> <p>DASA amended ACD.60(b) as follows, to remove ambiguity:</p> <p><i>ACD operations manuals must be easily accessible by relevant personnel and must detail procedures to ensure Suitability For Flight for Defence Aircraft</i></p> <p>Additionally, DASA deleted AMC ACD60(a).a.iii.</p> <p>Consulted with DD OPAW HQAC A9.</p>
59.	ACD.60(b)	A9 HQAC	How does one determine what 'easily accessible' means in practice?	Does this requirement come from somewhere else?	<p>The requirement is modelled from DASR ANSP.60 'Operations manuals'. The determination as to what is 'easily accessible' is context dependent. If the method of access and format (of operations manual content an individual requires to conduct a task) does not impact the safety or effectiveness of completing that task, then it is 'easily accessible'. However, if for example during a surveillance activity a member of an ACDSP was unable to access an operations manual without undue effort, or at all, then that operations manual would not be 'easily accessible'</p> <p>Consulted with DD OPAW HQAC A9.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
60.	AMC ACD.60(b). a.iii	A9 HQAC	Is stowed and rigged the correct terminology? Does not seem to fit with any of the language in the reg.		<p>DASA amended AMC ACD.60(b).a.iii (re-numbered as AMC ACD.60(b).a.i.(c)) to align with the ACD definition, as follows.</p> <p><i>General Cargo and Non-Standard Cargo is configured, placed, restrained and rigged in accordance with approved OIP</i></p> <p>Rationale: 'stowed' is synonymous with 'placed and restrained' in this context— and 'placement' and 'restraint' are the terms used throughout DASR ACD and in the definition of ACD in respect of the placement of cargo on Aircraft. 'Rigged' has been retained. It is a subset of 'composition' and is a commonly used term in the AFAMMAN.</p> <p>Consulted with DD OPAW HQAC A9.</p>
61.	ACD.60(c)	A9 HQAC	Point to DASR AVFM?		<p>DASA has not incorporated the suggested change. AVFM is only applicable to MAOs and ANSPs.</p> <p>ICW DD OPAW HQAC A9.</p>
62.	ACD.60(d)	A9 HQAC	Also see earlier comment for ACD.60(b). Confused with the double use of utilise. Is there any thought that MAOs wouldn't utilise safety procedures? Does it need to be stated?		<p>Yes, it needs to be stated. The statement at ACD.60(d) is conditional. Where the MAO or Sponsor utilises ACD services, they must create and use on-board emergency procedures to suit the three different load types defined at DASR ACD.60(a).</p> <p>DASA amended ACD 60(d) as follows:</p> <p><i>MAOs or Sponsors must utilise on board emergency procedures when carrying the ACD load types listed at ACD 60(a).</i></p> <p>Consulted with DD OPAW HQAC A9</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
63.	AMC ACD.70(a).b	A9 HQAC	Shouldn't non-ADE items such as nets, chains, pallets, restraint devices also have to comply?		LSN 145 refers.
64.	GM ACD.70.a	A9 HQAC	As per previous comments for GM ACD.20: Can be deleted if the suggestion to move the GM1 ACD.10 to the start of the reg is accepted. If not accepted, repeat the GM in toto to save having to go back to the start.		LSN 25 refers.
65.	AMC ACD.80(a).a.ii	A9 HQAC	delete 'defined and'.	Demand is variable and not defined anywhere, and unlikely to ever be. Doesn't stop there being a reasonably expected level though.	<p>DASA has not incorporated the suggested change. There is a need for a 'defined and reasonable level of demand' to enable the number of adequate personnel to be determined. The need is derived from bow tie analysis informed by aviation safety events— where a lack of personnel with the required currency was a contributing factor</p> <p>ICW DD OPAW A9</p> <p>DASA amended AMC ACD.80(a)a.ii as follows:</p> <p><i>maintain adequate numbers of personnel to provide the service, consistent with a defined and reasonable level of overall demand</i></p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
66.	AMC ACD.80(a).b	A9 HQAC	<p>1. A single plan for all of these aspects?</p> <p>2. And are all of these things actually included in an LMP? Would Categories and currencies not be in an SI?</p>		<p>No, all of these aspects are not required to be captured in a single plan (or package). The requirement is that each of the aspects is captured in <u>an</u> LMP. The distribution of aspects may be across a number of LMP.</p> <p>DASA added the following GM (at GM ACD.80(a).f.):</p> <p><i>Note, all of these aspects of AMC ACD.80(a).b are not required to be captured in a single LMP. The requirement is that each of the aspects is captured in an LMP. The distribution of aspects may be across a number of LMP.</i></p> <p>Categories and currencies may be listed in OIP separate to the LMP, such as an SI.</p> <p>Accordingly, DASA amended AMC ACD.80(a)b as follows:</p> <p><i>ACD service provision and instructor Competency management must be defined for all ACD load types defined at DASR ACD.60(a), in:</i></p> <p><i>i. a Learning Management Package (LMP) that considers:</i></p> <p><i>(a) education and training needs</i>  <i>(b) education and training Competency and proficiency standards</i>  <i>(c) education and training instructor standards.</i></p> <p><i>ii. approved OIP including:</i></p> <p><i>(a) categorisation of skills or Competencies</i>  <i>(b) Currency requirements.</i></p> <p>DASA confirmed with SM AFTG that AMC ACD.80(a).b correctly describes the relationship between an LMP and: 'education and training needs', 'education and training Competency and proficiency standards', and 'education and training instructor standards', ie an LMP 'considers' those elements (as outputs of Design or Development IAW SADL).</p>



LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
67.	AMC ACD.80(a).c	A9 HQAC	Is there an enduring system in Air Force that meets all of these requirements?		UltraFP, currently widely in use in AF to track Aircrew Currency and Competency, accompanied with appropriate instructions and processes would likely meet the requirements of at AMC ACD.80(a)c. The choice of the system is a command decision. The requirements at AMC ACD.80(a)c specify the outcome required to minimise the risk of the hazard that personnel are tasked to perform ACD activities, without the necessary Competency or Currency.  Consulted with DD OPAW A9
68.	GM ACD.80(a).a	A9 HQAC	As per previous comments for GM ACD.20: Can be deleted if the suggestion to move the GM1 ACD.10 to the start of the reg is accepted. If not accepted, repeat the GM in toto to save having to go back to the start.		LSN 25 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
69.	GM ACD.80(a).e	A9 HQAC	This is all great information, but overkill here. Is the same information going to be included in every DASR that has currency requirements? How about inclusion in the DASR Glossary or the DASPMAN?		<p>In due course DASA will consider including this definition in other DASR that cover currency management. It is not appropriate for the Glossary as it provides both a definition and extended guidance. The DASP Manual is issued to establish policy and guidance for the implementation of the DASP. At this stage specific detail on currency is not suitable for placement in the DASPMAN.</p> <p>Consulted with DD OPAW HQAC A9.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
70.	ACD.90	A9 HQAC	Has consideration been given to how this will work in practice? Does it include foreign militaries, or just commercial arrangements? Is it only about long-term contracts? Could it practicably be applied to the use of a contractor on a one-off basis?		<p>Yes, DASA has considered how the requirements of ACD.90 would work in practice. ACD.90 applies to contractors, not foreign militaries (unless that foreign military is providing an ACD service under a contract to a MAO conducting ACD or ACDSP).</p> <p>ACD.90 applies when an ACD service is contracted by the ACDSP or MAO. This applies to both short and long term contracts, as DASR ACD provides controls to preserve Suitability for Flight. Such controls are required, regardless of the duration of the service.</p> <p>Consulted with DD OPAW A9.</p> <p>After consultation with DD SIHF (DFSB), DASA made the following minor editorial amendments (changes underlined) to AMC ACD.90(a)i b:</p> <p><i>implement an accident and incident (<u>ie safety events</u>) reporting system that, in addition to the relevant NAA or MAA requirements (ie the NAA or MAA with jurisdiction over the platform that is the subject of the incident report), includes an equivalent notification period to DFSB (this is to ensure Defence awareness of safety <u>events and</u> issues, to allow for improved control over service provision under the contract, particularly outside Australia. In addition to country of occurrence incident reporting <u>requirements</u>, the legal instrument should identify the 1800 notification number for both Australian transport Safety Bureau (ATSB) and DFSB, as required, the desired reporting formats, and email notification addresses)</i></p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
71.	AMC ACD.90(a). a.i	A9 HQAC	Are these obligations practical and contemporary? They appear to be derived from the current DASR NDR, but are they valid and achievable? Have they been endorsed by Defence contract specialists?		<p>Requirements listed at AMC ACD.90(a)a are simple, practical, contemporary, valid and achievable. They do not need to be endorsed by a Defence contract specialist. The requirements are based on:</p> <ol style="list-style-type: none"> <li>1. defining the scope of ACD services expected from the contractor,</li> <li>2. compliance with the Australian Transport Safety Investigation Regulations 2021 and the DASM,</li> <li>3. gaining access to contractor records that validate they are providing the services expected (including from sub-contractors if they are being used, and the ability to conduct inspections as required)</li> <li>4. compliance with the WHS Act, as Defence is the PCBU</li> <li>5. defining exemptions from DASR ACD</li> <li>6. defining other safety controls required by the Defence contracting authority to ensure the contractor's ACD operation will not compromise Suitability For Flight.</li> </ol> <p>Consulted with DD OPAW A9</p>
72.	GM ACD.90(a). a	A9 HQAC	As per previous comments for GM ACD.20: Can be deleted if the suggestion to move the GM1 ACD.10 to the start of the reg is accepted. If not accepted, repeat the GM in toto to save having to go back to the start.		LSN 25 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
73.	GM ACD.90(a).b	A9 HQAC	The commentary of CSG being a ACDSP and the contractor not needing a certificate does not seem to tally with that in GM ACD.10(b) where all AMS were going to require separate ACDSPs.		LSN 23 refers.
74.	ACD.60(a)(1)	DCA DASA	Passengers restraint design is an airworthiness issue. I don't think passenger placement and restraint should be in the ACD regulations. DASR ORO.70 seems to already have this covered		<p>DASR ACD.60(a)1 regulates the availability of procedures for the preparation, composition, configuration, loading, placement, restraint and unloading of loads, not restraint design for passengers.</p> <p>ACDSPs, such as AMS prepare Passengers for flight, configure Passenger loads (including combined Passenger and other cargo loads), and may facilitate passenger briefings (including instructions relating to the use of passenger restraints), <i>inter alia</i>.</p> <p>ORO.70 is addressed to MAOs and deals with systems for carriage of and recording passengers. It is necessary to regulate (via ACD.60(a)1) the use of operations manuals by ACDSP and MAOs conducting ACD to detail the procedures used when interfacing with Passengers. In the case of MAOs conducting ACD, the artefacts produced by command may simultaneously meet the requirements of ACD.60 and ORO.70.</p> <p>Notwithstanding, DASA added GM ACD.60(a)1 as follows:</p> <p><i>DASR ORO.70 defines passenger restraint requirements on MAOs.</i></p> <p>Consulted with DD RLT (DCA)</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
75.	ACD.60(a)	DCA DASA	Who is accountable for (ensures) ACD operations manuals – i.e. what if an aircraft accident is caused by a deficiency in an ACD operations manual that was not produced by the MAO using it (and how is DASA assuring the safety of these manuals). In my opinion there are two options:	<p>1. Each MAO must authorise ACD operations manuals to be used on their platforms (MAO is accountable); or</p> <p>2. Instructions, procedures and information required for safe payload preparation, composition, configuration, placement and restraint should be within the scope of an ACDSP (ACDSP is accountable).</p> <p>My suggestion is that option 2 would be preferable but ACD.60(a) would need to be modified to state that only ACD operations manuals that have been authorised by an appropriately approved MAO or ADCSP, with scope for the production and maintenance of ACD manuals and the applicable platforms, may be used. You would also have to modify GM2 ACD.20(a) to make it clear that the production and maintenance of ACD operations manuals are considered ACD services to be included in the applicable CS</p>	<p>DASA has not incorporated the suggested changes.</p> <p>There is mutual accountability for ACD operations manuals in the case of an aircraft accident. If an aircraft accident was caused by a deficiency in an ACD operations manual that was not produced by the MAO, but it was used in the MAOs operation, then the MAO-AM would retain accountability, having approved that manual for use in their MAO (ie regardless of who produces an ACD operations manual, the AM is responsible for authorising its use). The due diligence in ensuring an ACD operations manual is suitable for a MAO's operations rests with the MAO-AM. However, the ACDSP AM may also be accountable. If the aircraft accident is caused by a deficiency in an ACD operations manual used by an ACDSP, then the ACDSP-AM is accountable. The due diligence in ensuring an ACD operations manual is suitable for a ACDSP's operation (including where that operation interfaces with Aircraft) rests with the ACDSP-AM.</p> <p>DASA assures the safety of these manuals by auditing compliance to DASR ACD.60(a) and AO.GEN.05, and through the review of the MAO and ACDSPs Compliance Statements during the application for MAOC and ACDSPC, or variations to the OPSPEC or SPC.</p> <p>DASA added the following text and diagram to GM ACD.60(a):</p> <p><i>GM3 ACD.60(a) – MAO and ACDSP Accountabilities (AUS)</i></p> <p><i>Figure 1 describes MAO and ACDSP individual and mutual ACD service provision accountabilities (over page)</i></p> <p>DASA added the following to AMC1 ACD.60(a):</p> <p><i>ensuring that any load clearances contained in the ACD operations manual are issued by an ACDSP approved to issue load clearances</i></p> <p>Consulted with DD RLT (DCA)</p> <p>DASA subsequently added the following (ICW DD OPAW (HQAC)) to GM ACD.60(a):</p> <p><i>(Note 'O&amp;E' refers to 'Oversight and Enforcement')</i></p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
		DCA - DASA			<p><b>ACD Service Provider accountabilities</b></p> <ul style="list-style-type: none"> <li>Accountable for the competency and currency of ACD service provider personnel, and the supervision and quality of the ACD service provided</li> <li>Accountable for conducting ACD operations IAW Defence authorised policy</li> </ul> <p><b>Conform with Defence authorised policy</b></p> <p><b>General</b></p> <ul style="list-style-type: none"> <li>AFAMMAN</li> <li>AAPs</li> <li>ADRM SSCS</li> </ul> <p><b>DG</b></p> <ul style="list-style-type: none"> <li>AFAMDOMAN</li> <li>AFAMMAN</li> <li>ICAD TI</li> <li>IATA</li> </ul> <p><b>MAO accountabilities</b></p> <ul style="list-style-type: none"> <li>Accountable for competencies and currencies for ACD personnel within their organisation (eg loadmasters and crewmen); supervision and authorisation of the ACD activities they conduct; and validation and acceptance of the service provided by the ACD service provider.</li> <li>Accountable for type specific OIP</li> <li>Accountable for conducting ACD operations IAW Defence authorised policy</li> </ul> <p><b>DASR ACD Service Provider O&amp;E</b></p> <p><b>DASR MAO O&amp;E</b></p> <p><b>Other DASA O&amp;E</b></p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
76.	AMC ACD.60(a) b(viii)	DCA DASA	The term 'permitted configurations' may not be appropriate when discussing eliminating or minimising risk SFARP when carrying Passengers and Cargo in the same aircraft compartment. Permitted configurations will differ depending on the operational context – i.e. it would be unlikely that risk would be considered eliminated or minimised SFARP when conducting a non-tactical administrative move whilst carrying Passengers and Cargo in the same aircraft compartment. I suggest that this requirement be moved to AMC ACD.60(b) – something like:	<p>AMC ACD.60(b)(vii) – Cognisant of contemporary crash protection requirements, risk is eliminated or minimised SFARP when carrying Passengers and Cargo in the same aircraft compartment. Risk assessments associated with the carriage of Passengers and Cargo in the same aircraft compartment, must be documented.</p> <p>GM ACD.60(b) – ACD Operations Manuals might only consider load restraint to prevent load-shifting in flight due to normal aerodynamic forces. Contemporary crash protection requirements will often exceed restraint requirements to prevent load-shifting.</p>	<p>DASA included the following additional AMC and GM:</p> <p><i>AMC2 ACD.60(a) When determining 'permitted configurations', ACDSPs and MAOs conducting ACD (cognisant of contemporary crash protection requirements), must eliminate or otherwise minimise risk SFARP when carrying Passengers and Cargo in the same Aircraft. When determining permitted configurations ACDSPs and MAOs must consider the operational context. ACDSPs and MAOs conducting ACD must document risk assessments associated with the carriage of Passengers and Cargo in the same Aircraft</i></p> <p><i>GM2 ACD.60(a) Defence OIP pertaining to cargo restraint might only consider load restraint to prevent load-shifting in flight due to normal aerodynamic forces. Contemporary crash protection requirements will often exceed restraint requirements to prevent load-shifting.</i></p> <p>Consulted with DD RLT (DCA)</p>



LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
77.	NPA 2021-18 Section 1, Part 1	AFTG	Replace 'Air Land' with 'Airland' and replace 'Air Drop' with 'Airdrop'	<p>Air Land and Air Drop are spelled 'Airland' and 'Airdrop' in the Australian Defence Glossary. DASR therefore misquotes the ADG citing the definitions from the ADG misspelled. External lift is not defined in the ADG hence DASR defining the term is acceptable.</p> <p>Note the correct spelling in the asterisk side notes in Figure GM2 ACD.20(a)-1 – Defence ACD environment but incorrect spelling in the Figure GM2 organisational structure (in the boxes).</p>	DASA amended the regulation to align with the ADG definitions for Airland and Airdrop.
78.	NPA 2021-18 Section 1, Part 2	AFTG	Replace 'Air Land' with 'Airland'.	The spelling for Airland is not from the ADG.	LSN 77 refers.
79.	NPA 2021-18 Section 1, Part 2	AFTG	Replace 'Air Drop' with 'Airdrop'	The spelling for airdrop is not from the ADG.	LSN 77 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
80.	GM1 ACD.10 Purpose	AFTG	<p>Current text reads: Defence Aircraft are required to carry and deliver Passengers, General Cargo and Non-Standard Cargo, either internally or externally.</p> <p>Reword: Defence Aircraft are required to carry and deliver Passengers, and General Cargo and Non-Standard Cargo either internally or externally</p>	This current text states that passengers may be carried internally or externally. Is there a DASA provision to carry passengers externally?	<p>DASA amended the purpose statement as follows:</p> <p><i>Defence Aircraft are required to carry and deliver Passengers; and General Cargo and Non-Standard Cargo either internally or externally</i></p> <p>There is no DASR provision to carry Passengers external to an aircraft.</p>
81.	ACD.10(b)	AFTG	Is ACD.10(b) an exception to ACD.10(a) or a derogation from ACD.10(a)?		LSN 21 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
82.	ACD.10(b)	AFTG	<p>Add 'but the MAO Operational Specification (OPSPEC) and CS must reflect the scope of ACD services provided IAW DASR ACD'.</p> <p>Further:</p> <p>* add GM ACD.10(b) that ACD.20(a) is not applicable.</p> <p>* AMC that:</p> <p>a. The MAO QMS and SMS shall incorporate ACD.30 and ACD.40</p> <p>b. The MAO shall comply with ACD.50, ACD.60, ACD.70, ACD.80 and ACD.90.</p>	<p>but the MAO Operational Specification (OPSPEC) and CS must reflect the scope of ACD services provided IAW DASR ACD'. is from ACD.20(b) that is proposed to be deleted.</p> <p>When ACD.10(b) states that ACD.10(a) is not applicable to a MAO, all requirements on the MAO are best stated in one location and using the suggested GM and AMC is intended to do that.</p>	<p>DASA combined the exception clauses at DASR ACD.10.b and DASR ACD.20.b into a revised DASR.ACD.20.b, IAW the <i>Interim DASR Style Guide</i> exception (or derogation) clauses must be at IR level and follow as closely as possible the clause to which they provide exception. LSN 35 refers Hence, DASA has not added the suggested GM.</p> <p>DASA added AMC ACD.20( b) as follows</p> <p><i>a. The MAO's QMS and SMS must incorporate the requirements of DASR ACD.40 and DASR ACD.50</i></p> <p><i>b. The MAO must comply with DASR ACD.60, DASR ACD.70, and DASR ACD.90.</i></p> <p>Consulted with SM AFTG</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
83.	GM ACD.10(b)	AFTG	Replace 'who's' with 'that's' or, preferably, reword: However, a unit that has the primary purpose to provide ACD ...	This GM includes the statement 'However, a unit who's primary purpose is to provide ACD ...' 'Who' relates to a person and a unit is not a person. That and which are used to refer to a thing.	DASA moved GM ACD.10(b) to GM ACD.20( b) (LSN 35 refers) and amended as follows:  '...However, a unit that has the primary purpose to provide ACD...'
84.	AMC ACD.20(a)a .ii ACDSP location(s).	AFTG	Replace 'location(s)' with 'location'.	Do not use parenthesis to create an alternative plural. The subsequent statement to include all locations involved negates the need for the plural in the paragraph title.	DASA replaced 'location(s)' with 'location' in AMC ACD.20(a)a.ii
85.	AMC ACD.20(a)a .iii	AFTG	Consider a para title, eg <b>Compliance statement.</b>	Consistent formatting across AMC elements.	DASA has not incorporated the suggested change. The format of the AMC detailing the elements a Compliance Statement in AMC ACD.20(a) is modelled on the equivalent in DASR.ANSP. Adding a paragraph title of 'Compliance statement' associated with an element of a Compliance Statement may introduce ambiguity.
86.	AMC ACD.20(a)a .iv	AFTG	Consider a para title, eg <b>Key Staff.</b>	Consistent formatting across AMC elements.	DASA has not incorporated the suggested change. The format of the AMC detailing the 'Key Staff' in AMC ACD.20(a)a iv is modelled on the equivalent in DASR.ANSP.
87.	AMC ACD.20(a)a .iv(c)	AFTG	Lowercase 'safety manager'.	The term 'safety manager' is not a proper noun.	DASA amended AMC ACD 20(a)a iv(c) (renumbered as AMC ACD.20(a)b.iii.) to remove the capitalisation of the term 'safety manager'.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
88.	AMC ACD.20(a)b operational limitations	AFTG	Reword 'DASA prescribes operational limitations on the SPC to assure safe operations of a particular ACD service within the ability or maturity of the ACDSP. An operational limitation typically will include reference to a plan and timeline to remove the limitation upon DASA review. An ACDSP may apply to DASA to remove or impose an operational limitation on the SPC via the submission of a CS.'	Reordering is needed to explain what an OL does before stating how an OL is managed and administered.	DASA amended the paragraph (re-numbered as AMC ACD.20(a)c.) as follows:  <i><b>Operational limitations.</b> DASA prescribes operational limitations on the SPC to assure safe operations of a particular ACD service within the ability or maturity of the ACDSP. An operational limitation typically will include reference to a plan and timeline to remove the limitation upon DASA review. An ACDSP may apply to DASA to remove or impose an operational limitation on the SPC via the submission of a CS.</i>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
89.	AMC ACD.20(a)e and f	AFTG	Merge subparas e and f.	Subpara f is more appropriately the final sentence of subpara e,	DASA amended AMC ACD.20(a) and merge paras e and f, as follows:  <i>e. Application for variation of an ACDSP certificate SPC. The ACDSP AM should amend the extant CS and submit this to DASA, highlighting those SPC items being varied. DASA, when satisfied, will issue an updated SPC to the ACDSP. Application for variation to an SPC is required, at a minimum, when there is:</i> <i>i. an addition, removal of, or change to an ACD service</i> <i>ii. a request to impose or remove operational limitations.</i>
90.	GM1 ACD.20(a)b .ii	AFTG	Replace 'location(s)' with 'locations'.	Do not use parenthesis to create an optional plural. The plural 'locations' is appropriate to the syntax and context.	DASA amended GM1 ACD.20(a)b.ii (re-numbered as GM ACD.20(a)1.b.ii.) to change 'location (s)' to 'locations'
91.	GM1 ACD.20(a)b .iv	AFTG	Remove parenthesis around 'or expiry date'.	Text is placed in parenthesis to provide clarification. The phrase 'or expiry date' is an alternative means of compliance not explanatory, hence is not appropriate to place in parenthesis.	DASA amended GM1 ACD.20(a)b.iv (re-numbered as GM ACD.20(a)1.b.iv.) to remove the parenthesis
92.	GM1 ACD.20(a)c ACDSP SPC	AFTG	Replace 'which' with 'that'.	The text following 'which' is needed to make sense of the guidance, making the text a 'restrictive clause', requiring 'that'.	DASA amended GM1 ACD.20(a)c (re-numbered as GM ACD.20(a)1.c.) and replaced 'which' with 'that'
93.	GM1 ACD.20(a)d initial issue of ACDSP and SPC	AFTG	Reword: DASA will issue an ACDSP certificate and SPC when satisfied all requirements have been met.	Active sentence structure.	DASA amended GM1 ACD.20(a)d (re-numbered as GM ACD.20(a)1.d.) as follows:  'DASA will issue an ACDSPC and SPC when satisfied all requirements have been met'

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
94.	GM1 ACD.20(a)e reissue or variation of ACDSP and SPC	AFTG	Reword: DASA will issue a new ACDSP certificate or SPC as required when satisfied all requirements have been met.	Active sentence structure.	DASA amended the sentence as follows:  'DASA will issue a new ACDSPC or SPC as required when satisfied all requirements have been met.'
95.	GM1 ACD.20(a)f	AFTG	Place Defence Aviation Safety Program Manual in italics. Names of publications are written this.	Names of publications are written thus.	DASA italicised the reference to <i>Defence Aviation Safety Program Manual Volume 3</i> .
96.	GM1 ACD.20(a)g .i	AFTG	Reword provide recommendatio n on the issue of or major variation to an ACDSP certificate or associated SPC	The phrase 'or major variation to' is necessary text, not a parenthetical phrase, hence commas are not appropriate.	LSN 1 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
97.	Figure GM2 ACD.20(a)-1 – <i>Defence ACD environment</i>	AFTG	Airland and airdrop are correctly spelled in the asterisk side notes but incorrectly spelled in the organisational structure (in the boxes).		LSN 77 refers
98.	DASR ACD.20(a)1	AFTG	Delete the comma after 'issue of an ACDSP certificate'	Commas are not used before a conjunction unless setting apart the following independent clause. The ACDSP certificate and the attached SPC are not independent.	DASA amended the sentence to remove unnecessary commas
99.	DASR ACD.20(a)2	AFTG	Delete the comma preceding 'or attached SPC.'	Commas are not used before a conjunction unless setting apart the following independent clause. The ACDSP certificate and the attached SPC are not independent.	DASA amended the sentence to remove unnecessary commas



LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
100.	DASR ACD.20(b)	AFTG	Delete and move the requirements in ACD.20(b), that the MAO OpSpec and CS must incorporate the ACD functions, in to ACD.10(b).	This IR is not needed because ACD.20(a) is already not applicable to a MAO via ACD.10(b), which establishes that an ACDSP approval is not required for a MAO, and ACD.20(a) is entirely about gaining an ACDSP certificate.  MAO requirements would be better incorporated in to ACD.10 to avoid the situation of the reader seeing ACD.10(b), that it is not applicable to a MAO, and then not reading the remainder of DASR ACD.	LSN 35 refers.
101.	AMC ACD.30(a).iv	AFTG	Replace 'key personnel' with 'Key Staff'	IAW the DASR Glossary.	DASA incorporated the suggestion.  Additionally, DASA amended the definition of 'Key Staff' as follows:  <i>Appointments within a DASA approved organisation which contribute to the safe operation of an aviation system</i>  Consulted with DD RLT (DCA) and OIC IARP (DIA)
102.	AMC ACD.30(a).v	AFTG	Replace 'which' with 'that'.	The text following 'which' is needed to make sense of the AMC element, making the text a 'restrictive clause', requiring 'that'.	DASA replaced 'which' with 'that'.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
103.	AMC ACD.30(a)a .vii	AFTG	Reword and resequence: viii. a Quality Management System (QMS) IAW ACD.50	The word 'suitable' is not required by referring to the IR. The QMS IR appears after the SMS IR, hence the AMC element for QMS should go after the element for SMS.	DASA amended and re-ordered the sentences as recommended
104.	AMC ACD.30(a)v iii	AFTG	Reword and resequence: viii. a Safety Management System (SMS) IAW ACD.40	The word 'suitable' is not required by referring to the IR. The SMS IR appears before the QMS IR, hence the AMC element for SMS should go before the element for QMS.	DASA amended and re-ordered the sentences as recommended
105.	GM ACD.30(a)b	AFTG	Replace 'which' with 'that'.	The text following 'which' is needed to make sense of the guidance, making the text a 'restrictive clause', requiring 'that'. The comma preceding the newly inserted 'that' remains because the text 'usually as part of a Force Element Group (FEG) or equivalent force structure' is a parenthetical phrase requiring the preceding and following commas.	DASA amended to replace 'which' to be replaced with 'that'.
106.	AMC ACD.50(a)a	AFTG	Replace 'which' with 'that'.	'That' is needed in place of 'which' because the following text is a restrictive clause describing the characteristics of the QMS that, if it were removed, would change the meaning.	DASA amended to replace 'which' with 'that'.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
107.	AMC ACD.50(a)a .iii	AFTG	Reword:  <b>Quality control.</b> Quality control is managed by appointed representatives to monitor conformance with and adequacy of the procedures and services, to ensure safe operations.	The commas surrounding 'and adequacy of' is not appropriate because with the commas make 'and adequacy of' a parenthetical phrase that means 'and adequacy of' can be removed without changing the meaning of the entry, which is clearly not the case.  The comma before 'to ensure safe operations' links 'to ensure safe operations' to the purpose of quality control rather than the elements that constitute quality control.	DASA amended the sentence as follows:  <i><b>Quality control.</b> Quality control is managed by appointed representatives to monitor conformance with and adequacy of the procedures and services, to ensure safe operations.</i>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
108.	GM2 ACD.50(a).i	AFTG	Replace 'Aviation Safety Reports' with 'Occurrence Reports IAW DASR BR Appendix 1'	ACD needs to scope all Occurrence Reports (DASR BR Appendix 1 Sect I to V) not just ASR (DASR BR Appendix 1, Sect I via the DASM)	<p>DASA amended GM2 ACD.50(a).i as follows:</p> <p><i>Quality improvement in ACD service provision will involve consultation and standardisation of services, including the review of:</i></p> <ul style="list-style-type: none"> <li><i>i. Aviation Safety Reports</i></li> <li><i>ii. Aviation Safety Investigation Reports</i></li> <li><i>iii. relevant Aviation Hazard Review Board Minutes</i></li> <li><i>iv. other Occurrence Reporting</i></li> <li><i>v. DG incident reports</i></li> <li><i>vi. feedback collected between ACD service providers and MAOs.</i></li> </ul> <p>Rationale: DASA has not directly referenced BR Appendix 1 as DASA BR are replaced by DASPMAN Vol 2 WEF 1 Sep 22. Additionally, DASA has not replaced ASR with 'Occurrence Reporting (OR) IAW BR Appendix 1', as not all ASR are OR IAW BR Appendix 1 (ie those OR which must be reported to the Authority), nor are all OR (IAW BR Appendix 1) ASR. ASR are specifically called out as a key source of aviation safety information informing Quality improvement. ASR are a subset of OR as defined in the DASR Glossary. Hence, the use of the phrase 'other Occurrence Reporting'.</p> <p>Consulted with SM AFTG</p>
109.	GM2 ACD.50(a).ii	AFTG	Delete	The term 'Aviation Safety Investigation Report' or '... Reports' does not exist in DASR or the DASM.	DASA has not incorporated the suggested change. As per LSN 108, this list provides an example of suitable resources. Additionally, DASA added ASIR to the DASR Acronyms. LSN 45Refers
110.	ACD.60(a)	AFTG	Second sentence is AMC for an 'authorised ACD operations manual'.		<p>DASA has not incorporated the suggested change. This second sentence of ACD.60.a establishes mandatory requirements on the regulated community — to which there are no alternate means of compliance. Hence, IAW the <i>Interim DASR Style Guide</i>, the second sentence of ACD.60.a must be IR.</p> <p>Consulted with SM AFTG</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
111.	AMC ACD.60(a)v i	AFTG	Reword:  including contingency plans to allow timely and effective response to those emergencies and abnormal events which may detract from Suitability For Flight  by replacing 'which' with 'that'.	The text following 'which' is needed to make sense of the rational for the contingency plans, making the text a restricted clause, requiring 'that'.	DASA replaced 'which' with 'that'. Additionally, DASA moved the content at AMC ACD.60(a)vi to AMC1 ACD.60(a)b x. LSN 8 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
112.	AMC ACD.60(a)a .vii	AFTG	Reword:  harmonised with AFIC practices and, where this is not possible, with ICAO and national civil practice instead, as far as practicable.	Original text reads 'harmonised with AFIC practices; and where this is not possible, with ICAO and national civil practice instead, as far as practicable', which, due to the semicolon and parenthetical phrase 'with ICAO and national civil practice instead' does not make sense.  The revised text in expanded form is:  harmonised with AFIC practices as far as practicable, or with ICAO and national civil practice as far as practicable where harmonisation with AFIC practices is not possible.	DASA incorporated the suggestion.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
113.	AMC ACD.60(a)b.viii	AFTG	Reword:  permitted configurations of Passengers, General Cargo and Non-Standard Cargo that eliminates and otherwise minimises crash protection risk SFARP when carrying Passengers and General Cargo or Non-Standard Cargo	Stating eliminate or minimise does not conform to the WHS Act, making it optional to eliminate or minimise, where one may choose not to eliminate and choose to minimise only instead.  Non-Standard Cargo may be harmful even though that cargo is not in the same aircraft compartment as the passengers. Removing 'in the same aircraft compartment' requires the policy for Passengers, General Cargo and Non-Standard Cargo consider the risk whenever passengers and cargo are on the same aircraft.	DASA amended AMC ACD.60(a)b.viii as follows:  <i>viii. permitted configurations of Passengers, General Cargo and Non-Standard Cargo that eliminates and otherwise minimises crash protection risk SFARP when carrying Passengers and General Cargo or Non-Standard Cargo in the same Aircraft</i>  LSN 76 Refers.  Consulted with SM AFTG
114.	AMC AMC.60(a)b.ix.d	AFTG	Delete the ending full-stop.	Full-stops appear only after the last word in a list of incomplete sentences.	DASA amended to remove the full stop.
115.	GM ACD.60(a)	AFTG	Reword  'Operations manuals is the generic term for the collection of ACDSP ...'  by replacing 'the' with 'a'.	The text following 'the' is exemplar of an operations manual not defining precisely what an operations manual is, hence 'a'.	DASA amended the sentence by replacing 'the' with 'a'. The sentence is as follows:  <i>GM ACD.60(a) – ACD operations manuals (AUS)</i>  <i>Operations manuals is a generic term for the collection of ACDSP Orders, Instructions and Publications, that covers all aspects of the ACD services provided, including operations, engineering, maintenance, supply and support, and logistics.</i>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
116.	GM ACD.60(a)	AFTG	Reword:  ... Orders, Instructions and Publications, and covers all aspects of the ...  by replacing 'and' with 'that'.	That is needed to provide the scope of what the ACD operations manuals do.	DASA amended by replacing 'and' with 'that'.
117.	GM ACD.60(a)	AFTG	Delete the parenthesis around 'including operations, engineering, maintenance, supply and support, and logistics' and place a comma before 'including'	Parenthesis ( ) is used for text which may be omitted. Although the sentence remains grammatically correct without the text in parenthesis, the text is needed in the sentence for scope. <a href="https://www.stylemanual.gov.au/style-rules-and-conventions/punctuation-marks/brackets-andparentheses">https://www.stylemanual.gov.au/style-rules-and-conventions/punctuation-marks/brackets-andparentheses</a>	DASA amended by deleting parenthesis and placed a comma as recommended.



LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
118.	AMC1 ACD.60(a)3 .a.i	AFTG	Reword DG is only carried if it has been inspected IAW AFAMDGMAN ; however, this does not apply to ALSE for the Crew of the Aircraft and for Aircraft Stores fitted to the Aircraft	DG is both singular and plural. However the plural form is not needed because the requirement stands whether there is one or multiple. An em rule is used to point backwards in the text to explain or supplement the preceding text, similarly to parenthesis and parenthetical phrases between commas. That is not the need for the exclusion.	DASA amended this sentence as follows:  <i>DG is only carried if it has been inspected IAW AFAMDGMAN. However, this does not apply to ALSE for the Crew of the Aircraft and for Aircraft Stores fitted to the Aircraft</i>
119.	AMC1 ACD.60(a)3 .a.v	AFTG	Either  1. 'Passengers are informed of DG that is restricted ...'  2. 'Passengers are informed of DG, which is restricted ...'	1. If the statement is that Passengers are informed of only that DG that is restricted from being taken on the aircraft  2. If the statement is that Passengers are informed that DG is restricted from being taken on the aircraft because all DG is restricted from being taken on the aircraft.	DASA amended using option 1. The sentence is as follows:  'Passengers are informed of DG that is restricted from being taken on board the Aircraft'
120.	AMC ACD.60(c)a .iii Service	AFTG	Does DASA mean 'single-Service' when using 'Service' or does DASA mean 'Defence'?		DASA amended AMC.60(c)a.iii as follows:  'iii. Navy, Army or Air Force WHS fatigue management policy requirements as applicable.'  Consulted with SM AFTG

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
121.	ACD.70 ACD Equipment, systems and installations	AFTG	Replace 'Equipment' with 'equipment'	The word 'equipment' is not a proper noun.	DASA added a definition for 'ACD Equipment' to the DASR Glossary. Hence, DASA retained the capitalisation of 'ACD Equipment' as a defined term.
122.	AMC ACD.70(a) ACD Equipment, systems and installations	AFTG	Replace 'Equipment' with 'equipment'	The word 'equipment' is not a proper noun.	LSN 121 refers.
123.	AMC ACD.70(a)i.	AFTG	Delete the full stop in AMC ACD.70(a).b	Using a full stop in AMC ACD.70(a).b within AMC ACD.70(a)i, is not appropriate because IR ACD.70(a) does not have a full stop.	DASA removed the full stop from 'AMC ACD.70(a)b'.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
124.	AMC ACD.70(a)b	AFTG		<p>What does DASA mean when using the undefined word 'ICW'?</p> <p>Naturally the context excludes ID 75700 Term individual combat weapon (Authorised Term) Shortened Form ICW (Authorised) Definition A small arms category which includes rifles of all types (including sniper and anti-materiel), shotguns and light machine guns, including light support weapons and squad automatic weapons.</p> <p>but may mean</p> <p>ID 55951 Term in coordination with (Authorised Term) Shortened Form ICW (Authorised Term)</p> <p>Writing 'in consultation with'; 'in coordination with'; in conjunction with' according to intent will minimise confusion and negate the use of a shortened form that does not need to be used. See AMC2 ACD.60(a)3.a.v.</p>	<p>DASA amended the acronym ICW in full to:</p> <p>' in consultation with....'</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
125.	AMC ACD.70(a)b	AFTG	Italicise Airworthiness Design Requirements Manual	Titles of publications are shown in italics.	DASA amended AMC ACD.70(a)b to italicise reference to the ADRM.
126.	GM ACD.70 ACD Equipment, systems and installations	AFTG	Replace 'Equipment' with 'equipment' because 'equipment' is not a proper noun.		LSN 121 refers.
127.	ACD.80(a)	AFTG		Why is a MAO conducting ACD not required to have a competency management system under DASR ACD?	MAO staff competency and training is managed under DASR AIRCREW.10.  Consulted with SM AFTG
128.	AMC ACD.80(a)b .i to iv	AFTG	Rewrite:  i. education and training needs ii. education and training Competency and proficiency standards iii. education and training instructor standards.	ACDSP may not be training personnel from ab initio but from an intermediate stage of learning. The LMPs in AFTG consider learning from ab initio but AFTG is not an ACDSP. Neither ab initio nor post graduate learning and training need be mentioned at all. Learning needs are learning needs and are irrelevant to where a trainee may be in the continuum.	DASA amended AMC ACD.80(a)b.i. to iv accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
129.	AMC ACD.80(a)c.v	AFTG	Acts are written in italics when presented in full eg <i>Archives Act 1983</i> . However, is prescribing the records management IAW the Act within DASA's remit? Also DASA shouldn't be pointing to the Archives Act. As a Defence Manual subordinate to DI ADMINPOL, DASR should be pointing to Defence policy, ie RECMAN, if such direction is required to be in DASR.	ADF Writing Manual	DASA amended AMC ACD.90(a)cv as follows:  'v. record preservation IAW the <i>Records Management Policy Manual</i> '  ( ie. <a href="http://intranet.defence.gov.au/drinhome/linkit.htm?site=RECMAN_-_Records_Management_Policy_Manual&amp;url=http://intranet.defence.gov.au/home/documents/data/DEFPUBS/DEPTMAN/RECMAN/RECMAN.pdf">http://intranet.defence.gov.au/drinhome/linkit.htm?site=RECMAN_-_Records_Management_Policy_Manual&amp;url=http://intranet.defence.gov.au/home/documents/data/DEFPUBS/DEPTMAN/RECMAN/RECMAN.pdf</a> )  Rationale: DASA retained a requirement to preserve records at AMC ACD.80( a)c.v. to support potential safety investigations. DASA referred to <i>RECMAN</i> as detailing the acceptable means of compliance of records preservation.
130.	GM ACD.80(a)e	AFTG	A non-breaking space is required to keep the value (14) with its unit of measure (months).	ADF Writing Manual	DASR incorporated the suggestion.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
131.	ACD.90(a)	AFTG	Delete the comma after 'MAOs conducting ACD and ACDSs ...'.	Comma separates the following text from its rationale.	DASA removed the comma as recommended.
132.	AMC ACD.90(a)a.i(a)	AFTG	Delete the full-stop	Full-stops appear only after the final word in a list of incomplete sentences	DASA removed the full stop as recommended.
133.	AMC ACD.90(a)a.i(b)	AFTG	Delete the full-stop after '... notification period to DFSB	Full-stops appear only after the final word in a list of incomplete sentences	DASA removed the full stop as recommended.
134.	AMC ACD.90(a)a.i(b)	AFTG	Text after '... period to DFSB' is GM not AMC. Move to GM.		DASA has not incorporated the suggested change, as the information is required to provide direct context to the AMC. However, DASA has introduced parentheses to simplify reading.
135.	AMC ACD.90(a)a.i(c)(i)	AFTG	Delete the clause 'but not limited to', which is not required	IAW the DASR Glossary:  Includes (Rules Of Interpretation) * 'Includes' means: 'includes but is not limited to'.	DASA removed the clause 'but not limited to' from AMC ACD.90(a)a.i(c)(i)

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
136.	AMC ACD.90(a)a.i(c)(i)	AFTG	Delete the text 'reporting or' and replace with 'and', vis:  '... and accident and incident reporting requirements'.	Both accident and incident reporting are applicable	DASA amended AMC ACD.90(a)a.i(c)(i) as follows:  <i>...records (which may include any contracts, inspection documents, and accident reporting and incident reporting requirements)</i>
137.	AMC ACD.90(a)a.i(c)(ii)	AFTG	Delete the clause 'but not limited to', which is not required	IAW the DASR Glossary:  Includes (Rules Of Interpretation) * 'Includes' means: 'includes but is not limited to'.	DASA amended the clause as follows:  <i>documentation (which may include documents provided to the recognised NAA or MAA, operations manuals, maintenance records, individual competency and currency records, safety occurrence reports and investigation reports).</i>
138.	AMC ACD.90(a)a.i(c)(ii)	AFTG	Delete the full-stop ending this paragraph	Full-stops appear only after the final word in a list of incomplete sentences	DASA amended accordingly.
139.	AMC ACD.90(a)a.i(d)	AFTG	Replace  'Work Health and Safety (WHS) Act 2011'  with  ' <i>Work Health and Safety Act 2011</i> (WHS Act)'.  ' <i>Work Health and Safety Act 2011</i> (WHS Act)'.	The current text is simply wrong. The names of legislative instruments are italicised when presented in full text.	DASA amended AMC ACD.90(a)ai(d) to correctly reference the WHS Act.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
140.	AMC ACD.90(a)a.i(e)	AFTG	The text from This ensures Defence ...' is GM not AMC. Move to GM.	All preceding text in AMC ACD.90(a)a(e) is a list of incomplete sentence. (e) contains complete sentences. One may not mix a list of complete and incomplete sentences. Moving the text from (e) to GM and deleting the full-stop after '... DASR ACD' removes the complete sentences	DASA has not incorporated the recommended change. This information provides context to the AMC. To enhance readability, DASA retained the text as AMC. However, DASA reworded AMC ACD.90(a)a.i(e) d (LSN 141 refers).
141.	AMC ACD.90(a)a.i(e)	AFTG	If the text 'This ensures Defence ...' is to be retained in AMC ACD.90(a)a(e), remove the final full-stop and replace  '... DASR ACD. This ensures Defence ...'  with  '... DASR ACD—this ensures Defence ...'	Using an em rule points backwards to explain the preceding text, and leaves the text ending '... DASR ACD' as an incomplete sentence	DASA amended AMC ACD.90(a)a.i(e) accordingly.



LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
142.	AMC ACD.90(a)a .iii	AFTG	<p>The text 'This ensures Defence has the ability to conduct regulatory oversight across the complete operation if required.' is GM not AMC; move to GM.</p> <p>If the text 'This ensures Defence ...' is to be retained in AMC ACD.90(a)a.iii, remove the final full-stop and replace</p> <p>'... during the task. This ensures Defence ...'</p> <p>with</p> <p>'... during the task—this ensures Defence ...'</p>	Using an em rule points backwards to explain the preceding text, and leaves the text ending '... during the task' as an incomplete sentence.	<p>DASA amended AMC ACD.90(a)a.iii as follows:</p> <p><i>allowance for Defence to make any safety inspections prior to task, or at any time during the task — this ensures Defence has the ability to conduct regulatory oversight across the complete operation if required</i></p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
143.	GM ACD.90(a)b	AFTG	Delete the final closing parenthesis.	The final closing parenthesis does not have a corresponding opening parenthesis.	DASA removed the final parenthesis.
144.	Definition – Air Cargo Delivery	AMTDU	Suggested Change: The representation of passengers and paratroopers as “cargo” in the definition of ACD is considered unnatural and has the potential to cause confusion with applicability of the regulation. The terminology “Aerial Delivery” would be more suitable, as used in the definition of Aerial Delivery Equipment	AMTDU acknowledges that DASR ACD aims to improve alignment with international ACD policy and regulation benchmarks, which may be the reason for the inclusion of paratroopers and passengers in the ACD definition. The proposed change is not essential but is added for the Authority’s awareness and consideration	DASA has not incorporated the suggested change. The definition of Air Cargo Delivery in Defence's aviation safety regulations included Passengers since prior to the DASR. Ie OAREG 6.1.6.a defined ACD to include: 'passengers, freight, paratroopers, animals and EO materials.'  There is a requirement to regulate the carriage of Passengers in Aircraft— to control the associated hazards. The hazards associated with the interactions between Passengers and other cargo (including crash protection considerations) warrant treating Passengers and other cargo together under DASR.ACD.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
145.	Definition – Aerial Delivery Equipment	AMTDU	Suggested Change: Update definition of Aerial Delivery Equipment as “Equipment employed on transport or rotary wing Aircraft in the aerial delivery of material; including slings, platforms, containers, Including but not limited to slings...”	The definition does not include equipment used in Airland cargo including pallets, restraint devices, chains, straps, nets. The definition could be updated to be clear that it is non-exhaustive	<p>ICW CENGR AMTDU</p> <p>DASA has not incorporated the suggested change. Rationale: IAW the DASR Glossary:</p> <p>Includes (Rules Of Interpretation) *</p> <p>'Includes' means: 'includes but is not limited to'</p> <p>DASA retained the ADG glossary definition of ADE as follows:</p> <p><i>Equipment employed on transport or rotary wing Aircraft in the aerial delivery of material; including slings, platforms, containers, parachutes, rigging materials, cloths, cords, tapes, threads, and webbing.</i></p> <p>To provide clarity that ACD Equipment includes all the equipment used in the aerial delivery of material (ie Airdrop) as well as Airland and External Lift, DASA included a new definition of ‘ACD Equipment’ as follows:</p> <p><i>Equipment employed in ACD via Airdrop, Airland and External Lift on transport or rotary wing Aircraft; including ADE, pallets, restraint devices, chains, straps, nets and loading devices.</i></p> <p>DASA amended AMC1 ACD.60(a).c.ix and AMC ACD.70(a).b to refer to ACD Equipment, vice ADE.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
146.	AMC ACD.20 (a)d.	AMTDU	Clarification is sought on whether the Accountable Manager (AM) attestation and signature would be that of the position or the person in the position. If the latter, the Compliance Statement needs to be resubmitted every few years coinciding with a new AM.	Comment included for the Authority's consideration	<p>DASA has not incorporated clarification. DASA confirms that the signature should reflect the incumbent AM posted into the position, as the AMC requires the following personal attestation:</p> <p><i>I am accountable for [insert organisation] compliance with DASR. This Compliance Statement for ACDSP certification and Service Provision Conditions is complete and correct. I am satisfied that appropriate arrangements are in place to meet DASR and support the scope of operations contained in the Service Provision Conditions.</i></p>
147.	AMC ACD.60(a). a.i	AMTDU	The Authority should note that the AFAMMAN in its current form is largely oriented towards Airland operations and does not contain adequate policy and procedures for Airdrop and External Lift.	MAOs conducting ACD and ACDSPs may not comply with this requirement for delivery of Airdrop and External Lift services, until such time as when the Defence ACD Manual containing sufficient policy on Airdrop and External Lift is issued.	DASA acknowledges this current limitation. DASA consulted with HQAC A4 staff about the need to update the AFAMMAN to include all requirements of the updated DASR ACD. HQAC A4 staff advise that the AFAMMAN update will be released before the new DASR ACD becomes effective (ie new DASR ACD released in Oct 22, and <u>effective</u> Oct 23).

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
148.	AMC2 ACD.60(a)3	AMTDU	The NPA reference is for Non-Standard Cargo but the title includes General Cargo. The AMC should either be relocated to ACD.60(a) OR the current NPA reference title updated to include only Non-standard cargo.		DASA incorporated the suggestion, amending AMC2 ACD.60 (a)3 to remove reference to 'General Cargo', in consultation with HQAC A4 staff.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
149.	AMC2 ACD.60(a)3 .a.	AMTDU	Clarification as follows is requested in order to understand potential resource and capability impact for AMTDU: Would generic instructions for Standard Loads be considered approved OIP as required by the reference NPA?	<p>The term “load clearance” is colloquially used in the ACD community to reference approved instrument containing loading and unloading instructions issued by AMTDU, to enable ACD of a Non-standard load. However, there are cargo including Non-Standard cargo that can be accepted by the MAO and Air Movements ACDSP if they meet the criteria detailed in the Standard Load Checklist (SLC) (approved by AMTDU) without the need for an AMTDU ACDSP “load clearance”. Cargo that meet the SLC are called Standard Loads.</p> <p>Standard Loads have generic instructions in applicable manuals. For example, Standard load instructions for C-17A would be contained in AAP7211.038-9-2, Section1, 2 and 5, TO 1C-17A-1, TO 1C-17A-9. MAO and Air Movements ACDSP are trained on loading and restraint of Standard Loads without a specific solution (instruction) from AMTDU.</p> <p>Question: Would the abovementioned generic instructions for Standard Loads be considered approved OIP to comply with the reference NPA? If the response to the above question is yes, no change is required. If the response is no, every Standard Load would require AMTDU load clearance, which would overwhelm and significantly impact AMTDU’s capability. To avoid this scenario, the reference NPA would require changing</p>	Yes. Any approved instruction from a relevant organisation acting within an approved scope would meet the requirements of 'OIP' in DASR ACD.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
150.	AMC2 ACD.60(a)3 .a.iv	AMTDU	Reword the NPA reference as follows: Using load clearance that ensure aircraft stability margins remain within positive margins of safety for the applicable flight envelop, so far as reasonably practicable	The suggested wording emphasises on “ensure” that External Lift loads cleared/approved by AMTDU ACDSP demonstrates positive margins of safety for aircraft stability margins, rather than “provide” aircraft stability margin (as the requirement is currently written) which could imply that the load clearance is to provide aircraft stability margin data (e.g. stability margin value/figure)? Instead of “provide aircraft stability margin...” a positive margin of safety for aircraft stability margin will be ensured through successful verification as part of flight trials or modelling based on contemporary flight trial methodology. Furthermore, simple External Lift cargo that satisfy certain stability or physical criteria may not warrant either flight trial or modelling to ensure positive margin of safety for aircraft stability margin. As such the need to deliberately perform aircraft margin of safety assessment via flight trials or modelling, should be based on what is considered reasonable, hence the suggestion for addition of “so far as reasonably practicable”.	<p>In consultation with AMTDU and AATES, DASA amended AMC2 ACD.60(a)3.a as follows:</p> <p>...iii. <i>using load clearances:</i></p> <p><i>a. provided by an ACDSP acting within an approved scope using:</i></p> <p><i>i. approved procedures, data, standards and limitations</i></p> <p><i>ii. a solution design assurance system for the control and supervision of solution designs, and for changes to existing solutions</i></p> <p><i>b. that consider Aircraft stability margins for external lift load clearances so far as reasonably practicable, such that they remain within acceptable margins of safety for the applicable Flight envelope...</i></p> <p>After further consultation with OIC IARP (DIA), DASA amended AMC2 ACD.60(a)3 as follows:</p> <p>...ii. <i>using load clearances issued by an ACDSP acting within an approved scope, that:</i></p> <p>(a) <i>uses approved procedures, data, standards and limitations</i></p> <p>(b) <i>that consider Aircraft stability margins for external lift load clearances so far as reasonably practicable, such that they remain within acceptable margins of safety for the applicable Flight envelope</i></p> <p>LSN 157 refers.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
151.	AMC2 ACD.60(a)3 .a.iii.(b)	AMTDU	Does the Design Assurance System need to be compliant with DASR 21.A.239?	<p><i>f.</i> Design Assurance System (DAS) has specific requirements under DASR 21.A.239, which AMTDU DAS is compliant with under AMTDU's DASR Part 21J MDOA. However, once AMTDU becomes an ACDSP under DASR ACD, will there be a requirement for AMTDU to maintain a DAS compliant with DASR 21.A.239?</p> <p>2. As an extension to this question, will there be a requirement for AMTDU to maintain DASR Part 21J MDOA? Whilst AMTDU does not anticipate implementing any significant changes to our current design assurance system as an ACDSP, AMTDU requests direction from the Authority on the need for AMTDU to maintain DASR Part 21J MDOA or a DAS compliant with DASR 21.A.239.</p>	<p>No, the AMTDU DAS does not need to be compliant with DASR 21.A.239, once AMTDU is a ACDSP IAW DASR ACD. DASA does not intend for AMTDU to maintain a 21J MDOA post implementation of DASR ACD. DASA modelled AMC2 ACD.60(a)3.a.iii.(b) (re-numbered and revised as AMC2 ACD.60(a)) on DASR 21.A.239. This requires ACDSPs to implement a framework that achieves the intent of DASR 21.A.239.</p> <p>Note, in the interim the AMTDU DAS must remain compliant with DASR 21.A.239. AMTDU should develop a transition plan to synchronise the withdrawal of their MDOA with the issue of an ACDSP Certificate before Oct 23.</p> <p>1. No, once AMTDU becomes a ACDSP under DASR ACD there will not be a requirement to maintain a DAS compliant with DASR 21.A.239.</p> <p>2. No, once AMTDU becomes a ACDSP under DASR ACD there will not be a requirement to maintain a DASR Part 21J MDOA.</p>



LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
152.	AMC2 ACD.60(a)3 .a.ii	AMTDU	Is there any additional requirement under DASA.ACD for Caveated Loads and Expedited Cargo Clearance risk advice, which do not comply with the reference NPA? Or are compliance of these products with DASA SMS.A.25 and DASA SPA.10 considered sufficient without the need for additional requirement?	AMTDU sometimes issues ACD load clearances called Caveated Loads and Expedited Cargo Clearance (ECC – which often results in a risk advice for MAO rather than a clearance) that do not completely comply with the ADRM requirements, as required by the NPA reference. The deficiencies are translated into risks which require risk acceptance by the appropriate RMA (MAO and/or Capability Manager) prior to transport of the load, or Command Clearance in the case of ECC. These follow the principles of DASA SMS.A.25 and DASA SPA.10	<p>No, there is no additional requirement under DASA ACD for caveated loads and expedited cargo clearance risk advice, which do not comply with AMC2 ACD.60(a)3.a.ii (re-numbered and revised as AMC2 ACD.60(a).i.(b)).</p> <p>DASA ACD sets out the requirements for the management of ACD to ensure Suitability For Flight.</p> <p>If there is a requirement for caveated loads or expedited cargo clearance risk advice, which do not comply with AMC2 ACD.60(a)3.a.ii (in the published version AMC2 ACD.60(a).i.(b)), then these activities should be approved via the flexibility provisions afforded by DASA — ie where an ACDSP or MAO conducting ACD requires an exception from a regulatory requirement, then that ACDSP or MAO conducting ACD should seek approval from the relevant authority IAW GR.80 (DASA), via MPTF (DASA), MCRI (DASA) or DASA SPA.10 (MAO-AM) as appropriate. It is not convention to refer to these mechanisms for seeking exceptions to DASA requirement in IR, AMC or GM.</p> <p>Consulted with CENGR AMTDU</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
153.	ALL	AVNCOMD	<p>- Applicability of DCDSR requirements to 176 AD</p> <p>- ACD definition suggests loading only</p>	<p>Are we able to get greater fidelity on how much the proposed regulations apply to 176 AD? According to the definitions, Air Cargo Delivery involves loading of air cargo. 176 AD don't really do this. They prepare loads, they transport the loads to the acft, but the CoG, W&amp;B and positioning of the loads (loading air cargo) isn't done by them. Do these regs apply to them at all? I assume that the intent is that they will, but I think we need a bit more fidelity on how they apply and which parts. As it stands, the entire reg set is a large administrative burden for a Sqn sized organisation</p>	<p>Yes, the proposed DASR ACD will apply to 176 AD, to the extent relevant to the scope of their activity. ACD is not just loading, it's also the activities that occur to prepare the load for the aircraft, such as design of a loading configuration, and the actions of a consigner who would prepare DG for transport. 176 AD also participate in the dispatch of ADE during flight. While 176 AD don't load items onto the Aircraft, their activities, such as preparation of a load for airdrop can directly impact the Suitability For Flight.</p> <p>DASA staff envisage the following elements of DASR ACD would apply to 176AD:</p> <p>ACD.10 ACD.20 ACD.30 ACD.40 ACD.50 ACD.60 (but not (d)) ACD.70 ACD.80</p> <p>Noting, that 176AD may not necessarily be obliged to be the custodian of the solutions to all regulatory elements listed above. But rather, may operate under the framework provided by a parent ACDSP organisation (typically at a 1* level).</p> <p>Additionally, DASA amended the proposed ACD definition as follows:</p> <p><i>Air Cargo Delivery: A process that involves the loading of air cargo (including the composition, configuration, placement and restraint), whatever it may be, including passengers, freight, paratroopers, animals and EO materials, and the subsequent unloading of the air cargo, either on the ground, surface or while in the air.</i></p> <p>Consulted with SO1 OPAW A (HQ AVNCOMD)</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
154.	ALL	AVNCOMD	Applicability of DASR ACD to Army RW (Army MAO)	What in these proposed regulations applies to rotary wing operations (read aircrewmembers)? Again, is it the entire reg set, or is this reg set just for non-aircrew ACD and aircrew are covered in ARO and ORO? Are we able to get more fidelity on this in the opening paragraphs of the regs?	Anywhere the phrase 'MAOs conducting ACD' or 'MAO' is used in the regulation indicates applicability to Aircrewmembers (in the Army context). Many of the regulatory controls in DASR ACD for non-Aircrew personnel competency and fatigue management are covered for Aircrew under DASR Aircrew, DASR ARO, DASR AVFM and DASR ORO. Specifically, the following elements of the proposed regulation would be applicable to Aircrewmembers: ACD.20(b) ACD.60(a), (b) and (d) ACD.70 ACD.90  DASA added GM2 ACD.10 accordingly  Consulted with SO1 OPAW A (HQ AVNCOMD)

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
155.	• ACD.10 (b) / ACD.20 (b) / ACD.60 (a) / ACD.70 (a)	AVNCOMD		<p>At present the Army MAO has a regulatory relationship with the Army ACD capability. It does not provide an ACD capability and it does not conduct ACD.</p> <p>Without being altered, this regulation would require Army to either a) hand command of the Army ACD capability to AVNCOMD or b) stand-up another MAO for Army ACD. I'm not sure either concept would be palatable to Army.</p> <p>Can I please request DASA consider rewording the regulation to de-couple the chain of command relationship of an organisation from the regulatory relationships of the MAO to external organisations</p>	<p>MAOs conduct ACD when they inspect, prepare, configure, compose, restrain, load or unload cargo using organic personnel. E.g. If an Aircrewman, without the support of an ALT or similar:</p> <ul style="list-style-type: none"> <li>• inspects</li> <li>• prepares</li> <li>• configures</li> <li>• loads</li> <li>• restrains</li> <li>• unloads</li> <li>• cargo, then that MAO is conducting ACD.</li> </ul> <p>A MAO is not required for the command of a ACD capability, under the proposed DASR ACD. Eg CSG is not under a MAO and will be an ACDSP, albeit with a much greater scope than 176 AD.</p> <p>DASA staff are reluctant to de-couple regulatory accountability from C2 and resource control in respect to the proposed DASR ACD. Aligning accountability with C2 and resource control is a central element of the proposed model to address hazards identified in the review of ACD ASIRs, RASRRs and checklist submissions</p> <p>Consulted with SO1 OPAW A (HQ AVNCOMD)</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
156.	• ACD.50 (and ACD.40)	AVNCOMD	imposition of a QMS (and SMS) on the ACDS	Is 176AD a ACDSP or, because they come under the Army MAO, they aren't? I assume they aren't and they will fall under our MAO, because the imposition of such a management function such a small organisation is enormous. That being said, if they do fall under our MAO, but not within our chain of command, I'm not sure about our command authority to impose a management system on them	<p>A unit that has the primary purpose to provide ACD functions must operate under an ACDSPC with a supporting CS. If 176 AD was placed under the C2 of AVNCOMD, then 176 AD could operate under AVNCOMD's ACDSPC. However, the current command relationship would require 176 AD to operate under a standalone ACDSP. Of note, the concept of introducing an SMS to 176 AD was raised at the 2021 ACD RASR</p> <p>Consulted with SO1 OPAW A (HQ AVNCOMD)</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
157.	ACD.60(a)	DIA	<p>Consider adding advice on Head of Design function as per 21.A.20 and GM1 to 21.A.239(a) 3.1.2</p> <p>Add independent monitoring requirement as per 21.A.239 (a)3</p>		<p>ICW OIC IARP (DIA) DASA amended AMC2 ACD.60(a)3 as follows:</p> <p><i>a. Where no specifically approved OIP exists for Non-Standard Cargo payload preparation, composition, configuration, placement and restraint, MAOs conducting ACD and ACDSPs should ensure that such items have approved payload preparation, composition, configuration, placement (including loading and unloading instructions) and restraint solutions developed:</i></p> <p><i>i. under an assurance system that:</i></p> <p>...</p> <p><i>(c) includes control and supervision of solution design development and changes to existing solutions</i></p> <p><i>(d) includes independent verification by a person not involved in creating the solution</i></p> <p><i>(e) includes independent monitoring of the compliance with, and adequacy of, the documented procedures of the system – this monitoring must include a feed-back system to a person or a group of persons having the responsibility to ensure corrective action.</i></p> <p><i>(f) requires the relevant design supervisor, or an authorised representative, to sign an attestation of compliance (with the ADRM, relevant equipment specification requirements, and any relevant standards), conformance (with the operations manual), and Suitability For Flight</i></p> <p>...</p> <p>Additionally, DASA added the following to GM ACD.60(a)3:</p> <p><i>The 'relevant design supervisor' is the senior technically qualified person with competency in design sufficient to ensure the design is conformant and supports Suitability For Flight. The 'relevant design supervisor' in AMTDU is typically the Chief Engineer.</i></p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
158.	ACD.60(a)	DIA	Give consideration to including a requirement in operations manuals the obligation to update manuals as a result of design changes (ala 21.A.61).		<p>DASA added the following to AMC1 ACD.60(a)a:</p> <p><i>iii. updated as a result of changes to:</i></p> <p><i>(a) load clearances issued by an ACDSP approved to issue load clearances</i></p> <p><i>(b) the AFAMMAN or AFAMDGMAN, or policy called out by the AFAMMAN or AFAMDGMAN</i></p> <p>DASA added the following to AMC1 ACD.60(a)b:</p> <p><i>Where the ACDSP is approved to issue load clearances, that ACDSP must inform those ACDSPs and MAOs conducting ACD (applicable to the relevant load clearance) of any changes or updates to load clearances.</i></p>