



DEFENCE AVIATION SAFETY AUTHORITY

COMMENT RESPONSE DOCUMENT

NPA FOR DCP 2021-030 - AMENDMENT TO DASR AMC

145.A.30(f) PERSONNEL REQUIREMENTS

INTRODUCTION

1. **General.** DASA takes this opportunity to thank those that have provided valuable community perspective and input. This Comment Response Document (CRD) summarises DASA's agreed regulation changes as a result of the Notice of Proposed DASR Amendment (NPA) for DCP 2021-030, 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 for DCP 2021-030 (Amendment to DASR AMC 145.A.30(f) *Personnel requirements*) and an associated factsheet for comment on 6 Jul 22. The period for public comment on the proposals contained in the NPA and factsheet closed on 31 Aug 22.

ANALYSIS OF COMMENTS

General

3. DASA received eight responses to the NPA. Seven of the responses agreed that the proposal is acceptable without change and one response agreed the proposal is acceptable but would be improved if a change was made.

4. The following respondents accepted the proposal without change:

- a. HQAC - A9;
- b. HQAFTG provided responses from their CAM Service Providers;
 - (1) Jet Aviation Australia Pty Ltd (PC-21);
 - (2) Jet Aviation Australia Pty Ltd (B300);
- c. HQAMG;
- d. LOGBR-AF; and
- e. Individual response from acting quality manager 37SQN.

5. HQSRG accepted the proposal but requested the timeframe for compliance be increased from early 2023 to mid-2023.

HQSRG Comment

6. SRG Maintenance units report limited numbers of personnel with a CASA Welding Authority and has members posted in early 2023. Research indicates that incoming members in Jan 23 will not have met Fact Sheet requirements. Suggest sliding the requirement for Maintenance Units to formulate a training plan and authorise members. Suggest timeframes for compliance be moved from early 2023 to mid-2023.

7. **DASA Response.** Compliance timeframe for DCP 2021-030 was already delayed from Oct 22 DASR release to Feb 23 DASR release to enable compliance (approx. eight months from NPA release date). If compliance is unable to be achieved by the Feb 23 DASR release (currently scheduled for 28 Feb 23) the SRG DASR 145 Maintenance Organisation should contact their designated DASA Desk Officer to negotiate a compliance timeline suitable to their circumstances.



AUTHORITY

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

PB CARTER

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Annex:

- A. NPA FOR DCP 2021-030 - Amendment to DASR AMC 145.A.30(f) Personnel requirements – regulated community feedback

NPA FOR DCP 2021-030 - AMENDMENT TO DASR AMC 145.A.30(f) PERSONNEL REQUIREMENTS – REGULATED COMMUNITY FEEDBACK

| LSN | NPA Reference | Originator | Community Feedback, Explanation or Suggested Change | DASA Response |
|-----|---------------|-----------------------------------|--|--|
| 1 | Paragraph 13 | HQ SRG | <p>Proposal is acceptable but would be improved if the following change was made: Suggest timeframes be moved for compliance to mid-2023</p> <p>Explanation SRG Maintenance units report limited numbers of personnel with the CAAP 33-1, with members posted in early 23. Research indicates that incoming members in Jan 23 will not have met Fact Sheet requirements. Suggest sliding the requirement for Maintenance Units to formulate a training plan and authorise members.</p> | Disagree the change is scheduled for incorporation in the DASR 23 Feb 23 release. Should a maintenance organisation be unable to comply by the 23 Feb 23 then they should contact the relevant DASA Desk Officer to negotiate their compliance date. |
| 2 | N/A | HQAC – A9 | Proposal is acceptable without change | |
| | N/A | HQ AFTG | Proposal is acceptable without change | |
| 3 | N/A | AFTG CAM Service Provider (PC-21) | Proposal is acceptable without change | |
| 4 | N/A | AFTG CAM Service Provider (B300) | Proposal is acceptable without change | |
| 5 | N/A | HQ AMG | Proposal is acceptable without change | |
| 6 | N/A | LOGBR-AF | Proposal is acceptable without change | |
| 7 | N/A | Individual A-QM 37SQN | Proposal is acceptable without change | |