



DEFENCE AVIATION SAFETY AUTHORITY

**COMMENT RESPONSE DOCUMENT
NPA FOR DCP 2021-038 - PROPOSED INCLUSION OF
QUALIFICATION AND EXPERIENCE REQUIREMENTS FOR
KEY PERSONNEL, TO DASR 147.A.105(b)**

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 2021-038, 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 2021-038 (*PROPOSED INCLUSION OF QUALIFICATION AND EXPERIENCE REQUIREMENTS FOR KEY PERSONNEL, TO DASR 147.A.105(b)*) and an associated factsheet for comment on 30 Aug 22. The period for public comment on the proposals contained in the NPA and factsheet closed on 16 Sep 22.

ANALYSIS OF COMMENTS

General

3. DASA received two responses to the NPA. Both responses stated the proposal is not acceptable but would be acceptable if changes was made.

4. The following respondents stated the proposal is not acceptable without change:

- a. Airbus; and
- b. Individual response from AMG Block 8.1 Upgrade Transition Team member.

Airbus Comments

5. Airbus emphasises Tertiary qualification in Leadership and/or management instead of Certificate IV in Training and Assessment. Questioning justification of TM's experience requirements in aviation and training environment and asking to define 'equivalent qualifications or other comparable qualifications acceptable to DASA'.

6. **DASA Response.** Noting this is GM and not AMC, a Certificate IV in Training and Assessment is recommended, with Tertiary qualifications in management being desirable. DASA will make a determination upon each individual's application when it comes to equivalent or comparable qualifications acceptable to DASA. Organisations seeking a Form 4 for their staff are encouraged to speak to their relevant DASA desk officer, ahead of submitting a Form 4, for additional guidance if needed. Existing Form 4 holders are unaffected by this change to DASR. DASA has made some minor editorial changes to the GM, to improve readability, based on the feedback provided.

AMG Individual Comments

7. ADF Personnel are only awarded a Cert IV and not Diploma as this is the VET sector approved level of training for ADF personnel in Aeroskill. The current BSB training package (Business Services) does not have any qualifications in 'Quality Management'. Current training packages include Quality Auditing, Project Management and Leadership and Management to list a few (ref: training.gov.au website). With no essential criteria listed the implementation has very little impost on those currently appointed to the roles. There may be delays in personnel obtaining the desired qualifications until they are notified they will be posted the positions. While the interview and selection process happens beforehand the nomination onto training courses and gaining of qualifications happened organically



post the member arriving into the position. Perhaps some time limit on them gaining the qualifications or criteria would be beneficial

8. **DASA Response.** DASA agrees to add Certificate IV Aeroskills for 1(a)(ii) and 3(a)(ii). Quality Management has been included as the recommended qualification to broadly encompass both domestic and equivalent international qualifications. The GM is to set DASA expectations and to ultimately enable successful and timely applications for a Form 4 within a DASR 147 MTO – hence essential criteria is not mandated. DASA will make a determination upon each individual’s application when it comes to equivalent or comparable qualifications acceptable to DASA. Organisations seeking a Form 4 for their staff are encouraged to speak to their relevant DASA desk officer, ahead of submitting a Form 4, for additional guidance if needed. Existing Form 4 holders are unaffected by this change to DASR. DASA has made some minor editorial changes to the GM, to improve readability, based on the feedback provided.

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

PB CARTER

Captain, RAN
Director Continuing Airworthiness
Defence Aviation Safety Authority

Annex:

A. Proposed Inclusion Of Qualification And Experience Requirements For Key Personnel, to DASR 147.A.105(b) – regulated community feedback

PROPOSED INCLUSION OF QUALIFICATION AND EXPERIENCE REQUIREMENTS FOR KEY PERSONNEL, TO DASR 147.A.105(b) – REGULATED
COMMUNITY FEEDBACK

LSN	NPA Reference	Originator	Community Feedback, Explanation or Suggested Change	DASA Response
1	NPA 1. a. Qualifications (i) Recommended	Airbus	A Certificate IV in Training and Assessment should not be the recommended qualification for the Training Manager (TM). Recommend this be changed to a Tertiary qualification in Leadership and/or Management.	Disagree: Noting this is GM and not AMC. A Cert IV T&A is recommended, with Tertiary qualifications in management being desirable. DASA will make a determination upon each individuals application. Organisations seeking a Form 4 for their staff are encouraged to speak to their relevant DASA desk officer, ahead of submitting a Form 4, for additional guidance if needed.
2	NPA 1. a. Qualifications (ii) Desirable	Airbus	The desirable qualifications for the Training Manager should include TAE40116 Certificate IV in Training and Assessment or the latest version of this qualification covers adult Vocational Education and Training, Foundation skills cover Language, Literacy, and Numeracy.	Disagree: As above this is GM and not AMC, each unit/org can make determinations for applications, so long as they are justified.
	NPA 1. b. Experience	Airbus	Remove one year experience in aviation training for the Training Manager. Remove two years experience as staff of DASA	Disagree: The Training Manager should be familiar with aviation activities in general within either DASA or CASA approved organisations (or within DASA) for two years, and at least one year involvement in aviation training environment. Organisations seeking a Form 4 for their staff are encouraged to speak to their relevant DASA desk officer, ahead of submitting a Form 4, for additional guidance if needed.
3	NPA 3. a	Airbus	Unable to see any benefit in upgrading to current Certificate IV in Training and Assessment as a requirement for TM and EM. Is it possible to outline the equivalent qualifications or other comparable qualifications acceptable to DASA in the GM?	Disagree: This is a GM and not AMC and is a 'Recommended' qualification. DASA will make a determination upon each individuals application when it comes to equivalent or comparable qualifications acceptable to DASA.

				Organisations seeking a Form 4 for their staff are encouraged to speak to their relevant DASA desk officer, ahead of submitting a Form 4, for additional guidance if needed. Existing Form 4 holders are unaffected by this change to DASR.
4	Resource implications – NPA 1. a. Qualifications (i) Recommended	Airbus	Tertiary qualification in Leadership and/or Management for the Training Manager – I already have these qualifications so no impact to Airbus. A Tertiary qualification in Leadership and/or Management allow the person to complete a number of different roles whereas TAE40116 Certificate IV in Training and Assessment limited the type of Manager that can be employed.	Disagree: Again this is GM, so DASA will make an assessment based on individuals application. Organisations seeking a Form 4 for their staff are encouraged to speak to their relevant DASA desk officer, ahead of submitting a Form 4, for additional guidance if needed. Existing Form 4 holders are unaffected by this change to DASR.
5	1.a. and 3.a.	Block 8.1 Upgrade Transition Team Air Mobility Group – Capability Transitions	ADF Personnel are only awarded a Cert IV as this is the VET sector approved level of training for ADF personnel.	Agree: Will add Cert IV Aeroskills for 1(a)(ii) and 3(a)(ii)
6	1.a.(ii)		By limiting the scope of desirable requirements to B or C that limits the position to only AVIONCS or AIRCRAFT technicians. Suggest adding A to allow other aviation trades to work in the role such as Structures, Armament, NDI, Aeronautical Life Support.	Disagree: This is a desirable requirement only and does not necessarily exclude any trade. DASA will make an assessment based on individuals application. Organisations seeking a Form 4 for their staff are encouraged to speak to their relevant DASA desk officer, ahead of submitting a Form 4, for additional guidance if needed.
7	2.a.(i) and (ii)		The current BSB training package (Business Services) does not have any qualifications in 'Quality Management'. Current training packages include Quality Auditing, Project Management and Leadership and Management to list a few (ref: training.gov.au website).	Agree: Quality Management has been included as the recommended qualification to broadly encompass both domestic and equivalent international qualifications.
	1. 2. 3.		Most Pre-requisites detail Essential and Desirable Criteria – not a recommended criteria. Recommended criteria would	Disagree: This is GM and is to set DASA expectations to enable successful and

			fit the desirable criteria in that it is purely a nice to have. If that is the preferred qualifications for the 147 roles than it should be annotated differently for less ambiguity	timely applications for a Form 4. DASA will make an assessment based on individuals application. Organisations seeking a Form 4 for their staff are encouraged to speak to their relevant DASA desk officer, ahead of submitting a Form 4, for additional guidance if needed.
	Whole document		For ADF courses (RAN and RAAF) the member must be an ADF Instructor 217015 to deliver instructional materials and assess students on a course. A member could not deliver 147 technical training without this course. A similar course is Training Management 113599 (RAAF), although while not compulsory for a 147 TM role, it is usually written and referenced within the Duty Statements for the applicable roles as a wide knowledge course	Disagree: Noting that these Qualifications are not only for ADF but for other Defence Industry MTO as well.
	Resource implications – Proposal implementation		With no essential criteria listed the implementation has very little impost on those currently appointed to the roles.	Agree: Criteria is GM. This GM is to set DASA expectations to enable successful and timely applications for new Form 4s. Existing Form 4 holders are unaffected by this change to DASR. Organisations seeking a new Form 4 for their staff are encouraged to speak to their relevant DASA desk officer, ahead of submitting a Form 4, for additional guidance if needed.
	Resource implications – Proposal sustainment		There may be delays in personnel obtaining the desired qualifications until they are notified they will be posted the positions. While the interview and selection process happens beforehand the nomination onto training courses and gaining of qualifications happened organically post the member arriving into the position. Perhaps some time limit on them gaining the qualifications or criteria would be beneficial.	Disagree: Responsible units/orgs must ensure their nominated staff have appropriate qualifications. DASA will make a determination upon each individuals application. Organisations seeking a Form 4 for their staff are encouraged to speak to their relevant DASA desk officer, ahead of submitting a Form 4, for additional guidance if needed.