



COMMENT RESPONSE DOCUMENT TO NPA 01/2020 – CERTIFICATION OF MAINTENANCE

INTRODUCTION

1. **General.** This Comment Response Document (CRD) outlines DASA's agreed policy and intended regulation changes and finalises the public consultation process in respect of this NPA. Only under extreme or unusual circumstances will DASA consider views or arguments opposing the views expressed in the CRD. Any member of the public having views or arguments to support an appeal against the decisions documented in this CRD may petition DASA to consider such an appeal.
2. **Background.** On 30 Jun 20, DASA released NPA 01/2020 Certification of Maintenance for comment. The period for public comment on the proposals contained in this NPA closed on 01 Aug 20.
3. DASA received responses to the NPA from twelve respondents. The quality of the responses was high and as a result changes to the draft AC in particular have been identified. There were some responses seeking to retain 'Maintenance Certification' within green text AMC and the DASA Glossary definition. DASA does not intend to do this as reduces the flexibility offered by the EMAR based regulation and where possible DASA intends to limit green text inclusion within DASR to that which is considered essential for Defence business.
4. DASA wishes to advise that, where a response made to the NPA was highly detailed and/or potentially contained sensitive corporate information, DASA will respond to the individual organisation separately.

ANALYSIS OF COMMENTS

General

5. Resulting from the NPA responses received, DASA considers that the majority of respondents understood the intent WRT the proposed regulation changes. A summary of revisions to the proposed regulation changes as a result of the NPA are at para 15 onwards. The majority of the comments received were with respect to the draft AC accompanying the proposed changes to the regulations. In particular the main comments and the corresponding actions are detailed below.

Draft AC Comment 1

6. Use of the term 'supervision' is confusing in the AC (ie. Technical Task supervision for the purpose of issuing CRS vs WHS definition of supervision vs General supervision of non-technical activities vs the DASR 66 E62 license exclusion which has a WHS element tied to it).

7. **DASA Response.** Agree

8. **Disposition** The AC will be revised to remove reference to supervision requirements. The DASR 66 E62 license exclusion is being reviewed with regard to clarifying exactly what the exclusion constitutes.

Draft AC Comment 2

9. Specialist Service Staff. The draft AC does not make clear how a specialist task/s is/are signed off and CRS conducted. The roles of the specialist trade person and the individual conducting CRS WRT the specialist task/s are not clear. Further, considerable impost is being felt in the regulated community regarding Structural Fitters not being issued a MAML.

10. **DASA Response.** Agree

11. **Disposition.** Reference to specialist service trades and associated conduct of task 'sign off' and CRS will be removed from the AC. DASA has determined that the issue requires further consideration and will issue a separate AC to independently inform on the issue/s.



Draft AC Comment 3

12. Further clarification of roles and responsibilities and removal of conflicting text required WRT task 'sign off' and CRS in Line, Base and Component maintenance. Further clarification required on the use of Support Staff in Base maintenance.

13. **DASA Response.** Agree.

14. **Disposition.** The AC will be amended to remove conflicting advice and specifically address the DASA position on what is required.

Amendments to Regulation changes proposed in the NPA

15. The amendments outlined in the NPA will be incorporated into DASR. Modifications to the proposed amendments that will be incorporated into DASR resulting from NPA responses are outlined below:

- a. The following definitions will be deleted from the DASR Glossary:
 - (1) Certificate of Release to Service (CRS) for Aircraft *.
 - (2) Certificate of Release to Service (CRS) for Components (Authorised Release Certificate) *.
 - (3) Certifying Staff Responsibilities*.
- b. The following extra changes will be made to DASR 66:
 - (1) AMC 66.A.10 Application:
 - (a) Second last sentence - Requests for advice should be submitted to **the NMAA**. The entire sentence will be changed to green text as it does not exist in EMAR.
 - (b) Last sentence - An application for a MAML or change to such a licence shall be made on a DASR Form 19 (Appendix V to DASR 66) in a manner established by the NMAA and submitted thereto. The entire sentence will be deleted as it duplicates the DASR 66.A.10 Application (a) clause.
 - (2) GM 66.A.20 Privileges:
 - (a) Delete paragraph 3. The following text will be deleted. **In the Australian context, the term 'competent mechanics' refers to individuals who hold an appropriate qualification or Statement of Attainment; have the appropriate training and experience for the particular maintenance tasks they are performing or supervising and are authorised by the DASR 145 maintenance organisation to certify (sign for) the maintenance they have performed or supervised.**
 - (3) GM 66.A.20(a)(2) Certification privileges (AUS)
 - (a) The GM will be deleted in total.
 - (b) The proposed new para 1 will not be inserted. The following text will not be inserted. **Supervision privileges can be exercised by B1 MAML holders if they do not have the E62 Exclusion – Supervision of Maintenance.**
 - (4) GM 66.A.20(a)3(ii) Certification privileges (AUS)
 - (a) The proposed new para 2 will not be inserted. The following text will not be inserted. **Supervision privileges can be exercised by B2 MAML holders if they do not have the E62 Exclusion – Supervision of Maintenance.**

AUTHORITY

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

J. AGIUS

AIRCDRE

Director General

Defence Aviation Safety Authority

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Annex:

A. List of Respondents

NOTICE OF PROPOSED AMENDMENT – NPA 01/2020

LIST OF RESPONDENTS

1. HQAC A9
2. LOGBR-AF
3. DASA Internal
4. FAA
5. FORCOMD
6. ACG
7. AMG
8. SRG
9. AFTG
10. AWC
11. Airbus Australia Pacific
12. Boeing Defence Australia