



COMMENT RESPONSE DOCUMENT TO DASR AMENDMENT RELEASE ON 09/11/20

INTRODUCTION

1. **General.** Readers should note that this Comment Response Document (CRD) is an 'interim' DASA response to stakeholder responses to NPA *Removal of ARO.40 – Aircraft Crash Protection 028/2020*.
2. **Background.** On 09 Nov 20, DASA released NPA *Removal of ARO.40 – Aircraft Crash Protection 028/2020* for comment. The period for public comment on the proposals contained in this NPA closed on 03 Dec 20, with an extension granted to 09 Dec 20 for one stakeholder response to be submitted.

ANALYSIS OF COMMENTS

General

3. Three responses were received, with two being from the regulated community. DASA thanks all respondents for their input. A number of themes were represented in these responses, with all considering that removal of DASR ARO.40 in its entirety is premature at this time. In particular, the responses highlighted the uncertainty of stakeholders in the maturity of the current systems available to manage crash protection risks. The responses also highlighted the potential for the removal of the ARO to result in inconsistent approaches to ensuring that crash protection attributes of Defence aircraft are harmonised with contemporary practice. Finally, the responses suggested that the extant DASR ARO.40 content, including associated AMC and GM, could be refocussed on MAO responsibilities with respect to management of CP related hazards and associated risks, which would alleviate the perceived inconsistencies and ambiguities in the ARO.
4. While investigating resolution of the issues identified in the responses, DASA has identified that further effort is required to comprehensively document an appropriate framework under which crash protection hazards and associated risks can be managed within Defence. This effort cannot be achieved prior to the April 21 DASR amendment and, consequently, the final determination on the disposition of DASR ARO.40 will be delayed until the October 21 amendment. Potential resolution may include:
 - a. retention of a revised DASR ARO.40
 - b. amendment of other related DASR (eg DASR SMS) to expand the scope of guidance material to include specific crash protection considerations
 - c. removal of DASR ARO.40, with detailed guidance on managing crash protection hazards and risks provided to MAOs through release of formal DASA guidance material (eg ACs).
5. A detailed DASA response to NPA responses will be issued in due course.

AUTHORITY

6. The content of this 'interim' Comment Response Document has been reviewed and is authorised.

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