



NOTICE OF PROPOSED DASR AMENDMENT

NPA 2020-016

DASR PART M PROPOSED AMENDMENTS AND DELETIONS AS IDENTIFIED BY DASR GREEN TEXT REVIEW

INTRODUCTION

Applicability

1. This proposal is applicable to all users of DASR M Continuing Airworthiness Management.

Purpose

2. The purpose of this NPA is to support the intent to amend and/or delete DASR M Regulatory, Acceptable Means of Compliance (AMC) and Guidance Material (GM) text.
3. The proposed amendments are to simplify, provide additional clarity and guidance to the associated text in the following DASR M Subparts:
 - a. Subpart B – Accountability
 - b. Subpart C – Continuing Airworthiness
 - c. Subpart G – Continuing Airworthiness Management Organisation (CAMO)
 - d. Subpart I – Military Airworthiness Review Certificate (MARC)
4. The benefits flowing from the proposal are expected to:
 - a. Simplify DASR M by removing and/or deleting green text that does not provide additional information or clarity to the associated regulatory text.
 - b. Improve alignment of DASR M to EMAR M.

Background

5. At the time of the initial release of DASR M there was no European Military Airworthiness Requirements (EMAR) AMC or GM. To assist the Defence aviation community in transitioning to the new regulatory suite, DASR AMC and GM green text was developed based on EASA AMC and GM as well as including unique Australian content to assist in the transition from the old Technical Airworthiness Regulation regulatory suite to DASR.
6. The initial version of EMAR M AMC and GM was released on 07 Jun 17 and was incorporated into the 28 Sep 17 DASR release. The incorporation of EMAR AMC and GM into DASR resulted in a significant amount of DASR M AMC and GM green text changing to black text. However DASR still retained a considerable amount of unique AMC and GM green text.
7. Since DASR was introduced in Sep 2016, the understanding of the regulatory principles has significantly matured. A review of DASR AMC and GM green text was undertaken to verify whether the green text provided clarity to DASR. The result of the review determined that some green text should be amended or removed to improve clarity and readability of DASR and in some cases changed to EMAR text.

Proposed Amendment / Deletions

8. The proposed amendments and/or deletions are presented at Annexes A through L. In some instances there will be text added directly from EMAR.

9. Annex H - NPA 2020-016 – Proposed Deletion of AMC Appendix I to DASR AMC M.A.302 - Content of the Aircraft Maintenance Program Text deletes a considerable amount of green text as the information has been moved to Advisory Circular 001/2021 - Aircraft Maintenance Programme and Reliability Programme. A copy of the draft Advisory Circular is attached as Enclosure 1.

Implementation Strategy

10. The proposed amendments are intended to be released by DASA as soon as practicable. This amendment of DASR M does not change the intent of the primary regulation or the compliance requirements.

HOW TO SUBMIT COMMENTS ON THIS NPA

Format

11. Responses to this NPA are to be recorded on the NPA Response Sheet included at Annex M. Responses are to be submitted by email to [DASA](#), Hardcopies of the NPA Comment Sheet are not required.

Timing

12. Comments on NPA 2020-016 are to be forwarded to DASA by close of business on 26 Feb 21.

Additional Information

13. Additional information concerning this NPA is available from Mr Stephen Smith stephen.smith8@defence.gov.au or (03) 9622 74360.

DISPOSITION OF RESPONSES RECEIVED

14. A Summary of Responses will be prepared and published on the [DASA Website](#). DASA will not individually acknowledge or respond to comments or submissions.

SN SKINNER

Captain, RAN
Directorate of Continuing Airworthiness
Defence Aviation Safety Authority
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29 Jan 21

Annexes:

- A. NPA 2020-016 – Proposed Amendment of DASR M Regulatory Text
- B. NPA 2020-016 – Proposed Amendment of DASR M AMC Text
- C. NPA 2020-016 – Proposed Amendment of DASR M GM Text
- D. NPA 2020-016 – Proposed Deletion of DASR M.A.301(a)(4) Continuing airworthiness tasks Text
- E. NPA 2020-016 – Proposed Deletion of AMC DASR M Subpart B – Accountability Text
- F. NPA 2020-016 – Proposed Deletion of AMC DASR M Subpart C – Continuing Airworthiness Text
- G. NPA 2020-016 – Proposed Deletion of AMC DASR M Subpart G – Continuing Airworthiness Management Organisation (CAMO) Text

- H. NPA 2020-016 – Proposed Deletion of AMC Appendix I to DASR AMC M.A.302 - Content of the Aircraft Maintenance Program Text
- I. NPA 2020-016 – Proposed Deletion of GM DASR M Subpart B – Accountability Text
- J. NPA 2020-016 – Proposed Deletion of GM DASR M Subpart C – Continuing Airworthiness Text
- K. NPA 2020-016 - Proposed Deletion of GM DASR M Subpart G – Continuing Airworthiness Management Organisation (CAMO) Text
- L. NPA 2020-016 - Proposed Deletion of GM DASR M Subpart I – Military Airworthiness Review Certificate (MARC) Text
- M. NPA 2020-016 – Response Sheet

Enclosure:

1. Draft Advisory Circular 001/2021 - Aircraft Maintenance Programme and Reliability Programme

NPA 2020-016

PROPOSED AMENDMENT DASR M REGULATORY AND AMC TEXT

M.A.201 Responsibilities (paragraph (g))
Rationale
<p>The green text "DASR 145 AMO" should be black text as per the convention in DASR to change EMAR to DASR.</p> <p>Amend retained green text to "or another maintenance organisation accepted by DASA." As DASA is the NMAA.</p>
Current Regulatory text
<p>(g) Maintenance of military aircraft, and components thereof shall be carried out by a DASR 145 AMO, or another maintenance organisation accepted by the NMAA.</p>
Proposed new Regulatory text
<p>(g) Maintenance of military aircraft, and components thereof shall be carried out by a DASR 145 AMO, or another maintenance organisation accepted by DASA.</p>

NPA 2020-016

PROPOSED AMENDMENT DASR M AMC TEXT

AMC M.A.201(g) Responsibilities (AUS)
Rationale
The AMC has been amended to simplify and clarify the text
Current AMC text
<p>A maintenance organisation is accepted by the NMAA if the organisation is oversighted by a recognised airworthiness authority and:</p> <p>(a) the maintenance is certified within a regulatory system equivalent to DASR. Prior to accessing the services of an organisation through Recognition, the consumer must ensure the organisation's suitability in accordance with the Recognition scope, conditions and caveats. The details of this requirement are included in the annexes to the relevant airworthiness authority Recognition certificate, available on the DASA Recognition web page.</p> <p>Or</p> <p>(b) the maintenance is certified within a regulatory system alternate to DASR. Prior to accessing the services of an organisation through Recognition, the consumer must ensure the organisation's suitability in accordance with the Recognition scope, conditions and caveats. The details of this requirement are included in the annexes to the relevant airworthiness authority Recognition certificate, available on the DASA Recognition web page.</p> <p>Or</p> <p>(c) the maintenance is certified using an alternate artefact accepted by DASA. In cases where a maintenance organisation is unable to provide the required artefact to an ADF consumer under existing oversight arrangements, the NMAA may agree that the CAMO can consume an alternate artefact where the CAMO can demonstrate, to the satisfaction of the NMAA, that:</p> <ol style="list-style-type: none">1. It is not feasible for the maintenance organisation to become a DASR 145 maintenance organisation;2. The maintenance organisation is unable to carry out maintenance under an existing DASR 145 organisation approval using the sub-contractor provisions of DASR 145.A.75—Privileges of the organisation;3. The maintenance is carried out, and the alternate artefact is issued, through the same processes by which the organisation provides a similar service under the oversight of a recognised airworthiness authority;4. The organisation is a suitable provider of the required service; and5. Appropriate controls are in place to ensure safety.
Proposed new AMC text
<ol style="list-style-type: none">1. A maintenance organisation is accepted by DASA if:<ol style="list-style-type: none">a. the organisation is oversighted by a recognised airworthiness authority; andb. prior to accessing the services of an organisation through Recognition, the consumer ensures the organisation's suitability in accordance with the scope, conditions and caveats set out in the applicable Recognition certificate (see DASA Recognition web page).

2. In cases where a maintenance organisation is unable to provide the required artefact to an ADF consumer under existing oversight arrangements, DASA may agree that the CAMO can consume an alternate artefact where the CAMO can demonstrate to the satisfaction of DASA that:
- a. it is not feasible for the maintenance organisation to become a DASR 145 maintenance organisation;
 - b. the maintenance organisation is unable to carry out maintenance under an existing DASR 145 organisation approval using the sub-contractor provisions of DASR 145.A.75—Privileges of the organisation;
 - c. the maintenance is carried out, and the alternate artefact is issued, through the same processes by which the organisation provides a similar service under the oversight of a recognised airworthiness authority;
 - d. the organisation is a suitable provider of the required service; and
 - e. appropriate controls are in place to ensure safety.

AMC M.A.201(h) Responsibilities (paragraph 4)

Rationale

The green text was derived from EASA AMC/GM Initial issue and Issue 2.

AMC M.A.201(h) was deleted from EASA regulations by Issue 2 Amendment 1 to 1321/2014 on the 11 Jul 16, with paragraph 4 contents moved to new GM M.A. 708 (EASA considered this material necessary guidance for any CAMO managing the continuing airworthiness of aircraft).

Green text to be deleted and DASR new GM M.A.708 Continuing airworthiness management to be created which will contain the green text removed from AMC M.A.201(h) paragraph 4.

Current AMC text

4. The CAMO should therefore have adequate knowledge of the design status (type design data, variance in certification basis, service bulletins issued by other relevant MAAs, Airworthiness Directives (AD), airworthiness limitations from the certification programme, ICA airworthiness limitations, eg as described in CS-25 Book 1, Appendix H, paragraph H25.1, fuel tank system airworthiness limitations including Critical Design Configuration Control Limitations (CDCCL), modifications, repairs, operational equipment and, required and performed maintenance). The Status of aircraft design and maintenance should be adequately documented to support the performance of the quality system.

Proposed new AMC text

4. The CAMO should therefore have adequate knowledge of the design status (type design data, Airworthiness Directives (AD), airworthiness limitations from the certification programme, fuel tank system airworthiness limitations including Critical Design Configuration Control Limitations (CDCCL), modifications, repairs, operational equipment and, required and performed maintenance).

AMC M.A.201(h)(1) Responsibilities (paragraph 1)
Rationale
<p>This was black text in the initial DASR release and was derived from EASA AMC.</p> <p>The DASR AMC text was retained as unique AUS green text in the September 2017 release which incorporated EMAR AMC text.</p> <p>AMC M.A.201(h)1 has been deleted from EASA regulations by Issue 2 Amendment 1 to 1321/2014. Therefore this paragraph is to be changed to Not Applicable to align with current EMAR text.</p>
Current AMC text
<p>1. An Operating Organisation only needs to be approved for the management of the continuing airworthiness of the aircraft listed on its MAOC. The approval to carry out airworthiness reviews is optional.</p>
Proposed new AMC text
<p>1. NOT APPLICABLE.</p>

AMC M.A.201(h)(1) Responsibilities (paragraph 4)
Rationale
<p>This was black text in the initial DASR release and was derived from EASA AMC.</p> <p>The DASR AMC text was retained as unique AUS green text in the September 2017 release which incorporated EMAR AMC text.</p> <p>AMC M.A.201(h)1 has been deleted from EASA regulations by Issue 2 Amendment 1 to 1321/2014. Therefore this paragraph is to be changed to Not Applicable to align with current EMAR text.</p>
Current AMC text
<p>4. DASR M.A.711(a)(3)(i) contains provisions to contract/task an organisation to perform continuing airworthiness management tasks on behalf of the CAMO. The contracted/tasked organisation is considered to perform the continuing airworthiness management tasks as an integral part of the Operating Organisation's continuing airworthiness management system hence is required to work under the quality system of the CAMO. DASR M.A.711(a)(3)(ii) contains provisions for continuing airworthiness management tasks to be contracted/tasked to an organisation working under their own DASR M.A Subpart G approval. In this situation the contracted/tasked CAMO is not required to work under the quality system of the contracting/tasking CAMO. In either case, the contracting/tasking CAMO retains the responsibility for all CAMO functions irrespective of who is undertaking them. DASR M.A.201(k) contains provisions for the Operating Organisation to contract/task a DASR M.A. Subpart G approved organisation for the management of the continuing airworthiness of the aircraft it operates. In this case the contracted/tasked CAMO assumes the responsibility for all CAMO functions.</p>
Proposed new AMC text
<p>4. NOT APPLICABLE.</p>

AMC M.A.202(a) Occurrence reporting
Rationale
<p>Intent of green text to be kept and reworded.</p> <p>The proposed change is consistent with DASR 21 and clarifies that it is the relevant holder, not 'the' design org for the platform. e.g. a minor repair approval holder that may differ from the TLS contractor.</p>
Current AMC text
<p>1. Operating Organisations should ensure that the (Military) Type Certificate ((M)TC) holder or the organisation responsible for the design of the aircraft or component receives adequate reports of occurrences for that aircraft type, to enable the M(TC) holder to fulfil its DASR 21 obligations.</p>
Proposed new AMC text
<p>1. Operating Organisations should ensure that the (Military) Type Certificate ((M)TC) holder and any relevant design approval holder receives adequate reports of occurrences for that aircraft type, to enable the M(TC) holder to fulfil its DASR 21 obligations.</p>

AMC M.A.305(h) Aircraft continuing airworthiness record system

Rationale

The AMC green text is not related to Continuing airworthiness record system and DASR AMC is missing EMAR text “Records stored in microfilm or optical disc form are also acceptable.”.
The green text should be deleted and the missing EMAR AMC text is to be incorporated into DASR.

Current AMC text

Continuing airworthiness records may, in some instances, need to be kept for longer durations to support trending analyses in support of an established reliability programme.

When an CAMO arranges for the relevant DASR 145 AMO to retain copies of the continuing airworthiness records on their behalf, the CAMO will continue to be responsible for the retention of records. If they cease to be the CAMO of the aircraft, they remain responsible for transferring the records to any other CAMO of the aircraft.

Keeping continuing airworthiness records in a form acceptable to the NMAA normally means in paper form or on a computer database or a combination of both methods. All records should remain readable and accessible for the duration of the storage period.

‘Readable and accessible’ means that the organisation should possess the ability to access the stored records in their original format for the duration of the specified storage period. Where the data contained in stored records is no longer compatible with changes and/or upgrades to equipment/computer/hardware/software, the organisation should put in place provisions to ensure that sufficient equipment is retained that is compatible with the storage medium, or that the records in their original format are transferred to an alternative medium.

Paper systems should use robust material, which can withstand normal handling and filing.

Computer systems should have at least one backup system, which should be updated at least within 24 hours of any maintenance. Each terminal is required to contain program safeguards against the ability of unauthorised personnel to alter the database.

Continuing airworthiness records should be stored in a safe way with regard to damage, alteration and theft. Computer backup discs, tapes etc., should be stored in a different location from that containing the current working discs, tapes, etc., and in a safe environment. Reconstruction of lost or destroyed records can be done by reference to other records which reflect the time in service, research of records maintained by repair facilities and reference to records maintained by individual mechanics, etc. When these things have been done and the record is still incomplete, the CAMO may make a statement in the new record describing the loss and establishing the time in service based on the research and the best estimate of time in service. The reconstructed records should be submitted to the NMAA for acceptance. The NMAA may require the performance of additional maintenance if not satisfied with the reconstructed records.

Proposed new AMC text

When an Operating Organisation arranges for the relevant DASR 145 AMO to retain copies of the continuing airworthiness records on their behalf, the Operating Organisation will continue to be responsible for the retention of records. If they cease to be the Operating Organisation of the aircraft, they remain responsible for transferring the records to any other Operating Organisation of the aircraft.

Keeping continuing airworthiness records in a form acceptable to the NMAA normally means in paper form or on a computer database or a combination of both methods. Records stored in microfilm or optical disc form are also acceptable. All records should remain readable and accessible for the duration of the storage period.

'Readable and accessible' means that the organisation should possess the ability to access the stored records in their original format for the duration of the specified storage period. Where the data contained in stored records is no longer compatible with changes and/or upgrades to equipment/computer/hardware/software, the organisation should put in place provisions to ensure that sufficient equipment is retained that is compatible with the storage medium, or that the records in their original format are transferred to an alternative medium.

Paper systems should use robust material, which can withstand normal handling and filing.

Computer systems should have at least one backup system, which should be updated at least within 24 hours of any maintenance. Each terminal is required to contain program safeguards against the ability of unauthorised personnel to alter the database.

Continuing airworthiness records should be stored in a safe way with regard to damage, alteration and theft. Computer backup discs, tapes etc., should be stored in a different location from that containing the current working discs, tapes, etc., and in a safe environment. Reconstruction of lost or destroyed records can be done by reference to other records which reflect the time in service, research of records maintained by repair facilities and reference to records maintained by individual mechanics, etc. When these things have been done and the record is still incomplete, the Operating Organisation may make a statement in the new record describing the loss and establishing the time in service based on the research and the best estimate of time in service. The reconstructed records should be submitted to the NMAA for acceptance. The NMAA may require the performance of additional maintenance if not satisfied with the reconstructed records.

AMC M.A.704(a) Continuing Airworthiness Management Exposition

Rationale

There is no Anbody's CAME template so the green text is not relevant. DASR AMC should be updated to align with the EMAR text. Changing the AMC template to align with EMAR would not require any changes to current approved CAME.

AMC M.A.704(a) should also be moved to AMC M.A.704 to align with EMAR.

Current AMC text

1. The purpose of the CAME is to set forth the procedures, means and methods of the CAMO. Compliance with its contents will assure compliance with DASR M requirements.
2. 'Anybody's DASR.M CAME satisfies the regulatory requirements of a CAME and is the NMAA's preferred CAME format. The template is available from the relevant NMAA desk officer.
3. If Anybody's DASR.M CAME is not used, the NMAA should be engaged early in the process and the CAME should comprise:

Part 1 - General organisation

Part 2 - Continuing airworthiness management

Part 3 - Quality system

Part 4 - Airworthiness review (if applicable)

4. Personnel should be familiar with those parts of the CAME that are relevant to their tasks.
5. The CAMO should specify in the CAME who is responsible for the amendment of the document.
6. Unless otherwise agreed by the NMAA, the person responsible for the management of the quality system should be responsible for monitoring and amending the CAME, including any associated procedures manuals, and the submission of proposed amendments to the NMAA. The NMAA may agree a procedure, which will be stated in the amendment control section of the CAME, defining the class of amendments which can be incorporated without the prior consent of the NMAA.
7. The CAMO may use Electronic Data Processing (EDP) for publication of the CAME. The CAME should be made available to the NMAA in a form acceptable to the NMAA. Attention should be paid to the compatibility of EDP publication systems with the necessary dissemination of the CAME, both internally and externally.
8. Part 1 "General organisation" of the CAME should include a corporate commitment by the CAMO, signed by the Accountable Manager, confirming that the CAME and any associated manuals define the organisation's compliance with DASR M and will be complied with at all times.
9. The Accountable Manager's Exposition statement should embrace the intent of the following paragraph, and this statement may be used without amendment. Any modification to the statement should not alter the intent:

This exposition defines the organisation and procedures upon which the DASR M.A. Subpart G continuing airworthiness management approval is based.

These procedures are approved by the undersigned and should be complied with, as applicable, in order to ensure that all continuing airworthiness tasks of... (quote Operating Organisation's name) fleet of aircraft and/or of all aircraft under contract/tasking in accordance with DASR M.A.201(k) with ... (quote CAMO's name) ... are carried out on time to an approved standard.

It is accepted that these procedures do not override the necessity of complying with any new or amended regulation published from time to time where these new or amended regulations are in conflict with these procedures.

It is understood that the NMAA will approve this organisation whilst the NMAA is satisfied that the

procedures are being followed and the work standard is maintained. It is understood that the NMAA reserves the right to suspend, vary or revoke the M.A. Subpart G continuing airworthiness management approval of the organisation or the military air operators certificate, as applicable, if the

NMAA has evidence that the procedures are not followed and the standards not upheld.

Signed.....

Dated.....

Accountable Manager and..... (quote position).....

For and on behalf of..... (quote organisation's name).....'

10. Whenever the Accountable Manager changes, it is important to ensure that the new Accountable Manager signs the paragraph 9 statement at the earliest opportunity as part of the acceptance by the NMAA. Whenever the accountable manager is changed it is important to ensure that the new accountable manager signs the paragraph 9 statement at the earliest opportunity as part of the acceptance by the NMAA.

Failure to carry out this action invalidates the DASR M.A Subpart G continuing airworthiness management approval or the military air operators certificate.

11. The CAME should contain information as applicable, on how the CAMO complies with CDCCL instructions.

Proposed new AMC text

1. The purpose of the CAME is to set forth the procedures, means and methods of the CAMO. Compliance with its contents will assure compliance with DASR M requirements.

2. A CAME should comprise:

- Part 0 General organisation
- Part 1 Continuing airworthiness management procedures
- Part 2 Quality system
- Part 3 Contracted/tasked maintenance
- Part 4 Airworthiness review procedures (if applicable)
- Part 5 Appendices

3. Where an Operating Organisation is also approved to DASR 145, the Exposition required by DASR 145 may form the basis of the CAME in a combined document:

DASR 145 Exposition (see equivalent paragraphs in DASR AMC 145.A.70 (a))

- Part 1 Management
- Part 2 Maintenance procedures
- Part L2 Additional line maintenance procedures
- Part 3 Quality system
- Part 4 Contracts/tasking with Operating Organisations
- Part 5 Appendices
- Part 7 (Not Applicable)
- Part 8 (Not Applicable)

Part 3 should also cover the functions specified by DASR M.A.712 Quality system.

Part 4 should also cover contracted/tasked maintenance.

Additional parts should be introduced into the combined Exposition covering the following:

Part 0 General organisation

Part 6 Continuing airworthiness management procedures

Part 9 Airworthiness review procedures (if applicable)

4. Personnel should be familiar with those parts of the CAME that are relevant to their tasks.
5. The CAMO should specify in the CAME who is responsible for the amendment of the document.
6. Unless otherwise agreed by the NMAA, the person responsible for the management of the quality system should be responsible for monitoring and amending the CAME, including any associated procedures manuals, and the submission of proposed amendments to the NMAA. The NMAA may agree a procedure, which will be stated in the amendment control section of the CAME, defining the class of amendments which can be incorporated without the prior consent of the NMAA.
7. The CAMO may use Electronic Data Processing (EDP) for publication of the CAME. The CAME should be made available to the NMAA in a form acceptable to the NMAA. Attention should be paid to the compatibility of EDP publication systems with the necessary dissemination of the CAME, both internally and externally.
8. Part 0 "General organisation" of the CAME should include a corporate commitment by the CAMO, signed by the Accountable Manager, confirming that the CAME and any associated manuals define the organisation's compliance with EMAR M and will be complied with at all times.
9. The Accountable Manager's Exposition statement should embrace the intent of the following paragraph, and this statement may be used without amendment. Any modification to the statement should not alter the intent:

"This Exposition defines the organisation and procedures upon which the DASR M.A. Subpart G continuing airworthiness management approval is based.

These procedures are approved by the undersigned and should be complied with, as applicable, in order to ensure that all continuing airworthiness tasks of... (quote Operating Organisation's name) fleet of aircraft and/or of all aircraft under contract/tasking in accordance with DASR M.A.201(k) with ... (quote CAMO's name) ... are carried out on time to an approved standard.

It is accepted that these procedures do not override the necessity of complying with any new or amended regulation published from time to time where these new or amended regulations are in conflict with these procedures.

It is understood that the (NMAA*) will approve this organisation whilst the (NMAA*) is satisfied that the procedures are being followed and the work standard is maintained. It is understood that the (NMAA*) reserves the right to suspend, limit or revoke the DASR M.A. Subpart G continuing airworthiness management approval of the organisation, if the (NMAA*) has evidence that the procedures are not followed and the standards not upheld."

Signed.....

Dated.....

Accountable Manager and..... (quote position).....

For and on behalf of..... (quote organisation's name).....

Note: Where it states (NMAA*), please insert the actual name of the NMAA, for example DASA

10. Whenever the Accountable Manager changes, it is important to ensure that the new Accountable Manager signs the paragraph 9 statement at the earliest opportunity. Failure to carry out this action could invalidate the DASR M.A. Subpart G approval.
11. The CAME should contain information as applicable, on how the CAMO complies with CDCCL instructions.

AMC M.A.707(a)(1)(iii) Airworthiness review staff

Rationale

Note the last dot point green text has / will be deleted via a separate DCP 2020-016.

DASR is missing text after the fourth dot point that is in EMAR/EASA “relevant sample” means that these courses should cover typical systems embodied in those aircraft being within the scope of approval;”

Current AMC text

Formal aeronautical maintenance training means training (internal or external) supported by evidence on the following subjects:

- Relevant parts of initial and continuing airworthiness regulations; and
- Relevant parts of operational requirements and procedures, if applicable; and
- The CAME; and
- knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to DASR 66 Appendix III Level 1 General Familiarisation and could be imparted by a DASR 147 MTO, by the manufacturer, or by any other organisation accepted by the NMAA; and
- Maintenance methods; and
- Knowledge of the aircraft's type design approved by the MAA / (M)TC holder.

Proposed new AMC text

Formal aeronautical maintenance training means training (internal or external) supported by evidence on the following subjects:

- Relevant parts of initial and continuing airworthiness regulations; and
- Relevant parts of operational requirements and procedures, if applicable; and
- The CAME; and
- knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to DASR 66 Appendix III Level 1 General Familiarisation and could be imparted by a DASR 147 MTO, by the manufacturer, or by any other organisation accepted by the NMAA;

“relevant sample” means that these courses should cover typical systems embodied in those aircraft being within the scope of approval;

- Maintenance methods.

AMC M.A.709(a) Documentation (AUS)
Rationale
<p>Unique AUS AMC should be replaced with EMAR AMC. The EMAR content is based on EASA AMC M.A.709 and is more relevant than the unique DASR AMC M.A.709(a).</p> <p>The AMC should also be relocated from DASR M.A.709(a) to DASR M.A.709 to align with EMAR / EASA.</p>
Current AMC text
<p>The CAMO is responsible for ensuring that the maintenance data is current. As a consequence, it should establish appropriate procedures or provisions in the contract/tasking with the Operating Organisation/(M)TC holder / any other organisation as defined in DASR 21 as appropriate.</p>
Proposed new AMC text
<p>When a CAMO is contracted/tasked under DASR M.A.201(k) for the management of the continuing airworthiness of aircraft operated by the Operating Organisation and it uses maintenance data provided by the Operating Organisation, the CAMO is responsible for ensuring that this data is current. As a consequence, it should establish appropriate procedures or provisions in the contract/tasking with the Operating Organisation.</p> <p>The sentence "..., except when required by DASR M.A.714", means, in particular, the need to keep a copy of the Operating Organisation's data which was used to perform continuing airworthiness activities during the contract/tasking period.</p>

AMC M.A.714 Record-keeping

Rationale

Paragraph 1 - The regulation text relates to record keeping whereas the green text in the AMC is specific to CRS. DASR M.A.714(a) states "The aircraft records required by DASR M.A.305 and, if applicable, DASR M.A.306, shall be retained." DASR M.A.305 requires that the CRS is to be entered into the aircraft continuing airworthiness record system. Therefore the green text can be deleted.

Paragraph 3 - The green text should actually be black text as it is the same as EMAR. NOTE The second sentence from EMAR "AMC Records stored in microfilm or optical disc form are also acceptable." should also be included in paragraph 3 as well as the associated paragraph 6 as they do not change the intent of the AMC as it is just another option for record retention.

Current AMC text

1. The CAMO should ensure that it always receives a complete certificate of release to service (CRS) from the DASR 145 or equivalent certifying staff such that the required records can be retained. The system to retain the continuing airworthiness records should be described in the CAME.
2. When a CAMO arranges for a DASR 145 AMO to retain copies of the DASR M.A.714 continuing airworthiness records on its behalf, the CAMO will nevertheless continue to be responsible for their preservation. If another CAMO assumes responsibility for managing the continuing airworthiness of an aircraft, then the original CAMO is responsible for transferring the records.
3. Keeping continuing airworthiness records in a form acceptable to the NMAA means in paper form or on a computer database or a combination of both methods. The record should remain legible throughout the required retention period.
'Readable and accessible' is defined in AMC DASR M.A.305(h).
4. Paper systems should use robust material which can withstand normal handling and filing.
5. Computer systems should have at least one backup system which should be updated within 24 hours of any new entry. Each terminal is required to contain program safeguards against the ability of unauthorised personnel to alter the database.

Proposed new AMC text

1. The system to retain the continuing airworthiness records should be described in the CAME.
2. When a CAMO arranges for a DASR 145 AMO to retain copies of the DASR M.A.714 continuing airworthiness records on its behalf, the CAMO will nevertheless continue to be responsible for their preservation. If another CAMO assumes responsibility for managing the continuing airworthiness of an aircraft, then the original CAMO is responsible for transferring the records.
3. Keeping continuing airworthiness records in a form acceptable to the NMAA means in paper form or on a computer database or a combination of both methods. Records stored in microfilm or optical disc form are also acceptable. The record should remain legible throughout the required retention period.
'Readable and accessible' is defined in AMC DASR M.A.305(h).
4. Paper systems should use robust material which can withstand normal handling and filing.
5. Computer systems should have at least one backup system which should be updated within 24 hours of any new entry. Each terminal is required to contain program safeguards against the ability of unauthorised personnel to alter the database.
6. Microfilming or optical storage of continuing airworthiness records may be carried out at any time. The records should be as legible as the original record and remain so for the required retention period.

AMC M.A.901 Aircraft airworthiness review (AUS)

Rationale

The green text was mainly to support transition to DASR and the compliance grace period of three years was in relation to when an airworthiness reviews would be due. The purpose of the grace period was to allow time for DASA and CAMOs to develop the capability to perform airworthiness reviews. As the grace period is now over and DASA has provided airworthiness review training and have formally accepted CAMO airworthiness review staff.

First sentence of the AMC should be retained as it provides AMC in regards to when the initial airworthiness review is due. The remaining green text can be deleted as it is DASR transitional information.

Current AMC text

The initial airworthiness review is due within 12 months of the issue date of the aircraft's initial Military Restricted Certificate of Airworthiness (MRCoA) or Military Certificate of Airworthiness (MCoA). To support transition to DASR, a compliance grace period of three years exists from the release of provisional DASR. This assumes that the extant Certificate of Airworthiness (or equivalent Special Flight Permit (SFP) coverage) for individual Defence registered aircraft is valid at the time of DASR release. The compliance flexibility allows time for the NMAA, CAMO and contracted/tasked continuing airworthiness support organisations to develop the capability to perform airworthiness reviews and agree on a baseline of what is considered acceptable for individual aircraft. The following provides further clarity:

- a. for aircraft on the Defence register operating under a Military Type-certificate at the time of release of provisional DASR, then the initial military airworthiness review is due three years from release of the provisional DASR,
- b. for aircraft on the Defence register operating under a SFP at the time of release of provisional DASR, then the initial military airworthiness review is due on the latter of:
 - i. three years from release of the provisional DASR, or
 - ii. one year from the issue of a DASR MRCoA, or MCoA within the grace period.
- c. for aircraft to be loaded onto the Defence register during the three year grace period, then the initial military airworthiness review is due on the latter of:
 - i. three years from release of the provisional DASR; or
 - ii. one year from the issue of a DASR MRCoA, or DASR MCoA within the grace period.
- d. for aircraft loaded onto the Defence register three years after the release of provisional DASR, then the initial military airworthiness review is due one year from the issue of a DASR MRCoA, or DASR MCoA

Proposed new AMC text

The initial airworthiness review is due within 12 months of the issue date of the aircraft's initial Military Restricted Certificate of Airworthiness (MRCoA) or Military Certificate of Airworthiness (MCoA).

AMC M.A.901(d) Aircraft airworthiness review (sub paragraph g, fifth dot point)
Current AMC text
Rationale
AMC to be amended to align with EMAR and to include "(weight and balance statement)" as green text.
- the valid weight and and balance statement reflecting the current configuration of the aircraft; and
Proposed new AMC text
- the valid weight and centre of gravity schedule (weight and balance statement) reflecting the current configuration of the aircraft; and

Appendix II to AMC M.A.201(h)(1) Contracting/tasking of continuing airworthiness management tasks (paragraph 1.1)
Rationale
Paragraph 1.1 is N/A in EMAR. EASA Regulations are applicable to a wide variety of commercial organisations whereas EMAR and DASR are generally contracting / tasking applicable to a limited number of approved organisations and DASR CAMOs should have the appropriate competent staff. As military CAMO should have competent staff who are competent in the disciplines associated with DASR M.A. Subpart G, paragraph 1.1 should be N/A in DASR to align with EMAR.
Current AMC text
1.1 To actively control the standards of the sub-contracted/tasked organisation the Continuing Airworthiness Management Organisation (CAMO) should employ a person or group of persons who are trained and competent in the disciplines associated with M.A Subpart G. As such they are responsible for determining what maintenance is required, when it has to be performed and by whom and to what standard, in order to ensure the continued airworthiness of the aircraft being operated.
Proposed new AMC text
1.1 NOT APPLICABLE

NPA 2020-016

PROPOSED AMENDMENT OF DASR M GM TEXT

GM M.A.301(a)8 Continuing airworthiness tasks (AUS)
Rationale
Amend and simply content to clarify that a maintenance check flight is different to a flight test. Provide a link to DASR 21.A.135 Flight Tests.
Current GM text
Conducting 'maintenance check flights when necessary' means conducting maintenance check flights when required by Instructions for Continuing Airworthiness (ICA), however ICA may use different terminology. Note, there may be other check flights conducted in service that are not required by ICA; these flights are not a regulatory requirement. Maintenance check flight is not to be confused with flight test which is covered under DASR 21.
Proposed new GM text
Maintenance check flight is not to be confused with a flight test which is covered under DASR 21.A.35 – Flight Tests.

GM M.A.305(c) Aircraft continuing airworthiness record system (AUS)
Rationale
Amend 'Engine Structural Integrity Management Plans (ESIMP)' to Propulsion System Management Plans (PSIMP)' and change MAA to DASA.
Current GM text
For clarification 'other airworthiness data as required by the MAA' includes other usage parameters that may be required to be captured to support continuing airworthiness, eg strain data, G exceedances, full stop landings versus touch and go. A list of airworthiness data required by the MAA can be found in the Aircraft Structural Integrity Management Plan (ASIMP) and Engine Structural Integrity Management Plans (ESIMP) for each Defence platform.
Proposed new GM text
Other airworthiness data as required by DASA includes other usage parameters that may be required to be captured to support continuing airworthiness, eg strain data, G exceedances, full stop landings versus touch and go. A list of airworthiness data required by DASA can be found in the Aircraft Structural Integrity Management Plan (ASIMP) and Propulsion System Management Plans (PSIMP) for each Defence platform.

GM M.A.702(b)(2) Application (AUS)
Rationale
<p>This GM is the same as GM M.A.708(b)(2) and is to be amended as per the changes to GM M.A.708(b)(2). As this GM is not in EMAR all text should be green.</p> <p>The green text "For clarification, the default Defence position is that the CAMO develops and controls the NMAA approved Aircraft Maintenance Programme (AMP) for the aircraft managed." is to be amended by deleting "For clarification". The third and fourth paragraphs do not provide any clarification and are to be deleted.</p>
Current GM text
<p>It is possible that the AMP will be provided to the CAMO for some aircraft types whilst for other aircraft types the AMP is to be 'developed and controlled' by the CAMO. This will be identified by the NMAA on a platform-by-platform basis. In these cases it is possible that the CAMO's responsibilities towards the 'development and control' of the AMP of the aircraft types for which it is responsible will differ. These differences are to be clearly identified in the CAME.</p> <p>For clarification, the default Defence position is that the CAMO develops and controls the NMAA approved Aircraft Maintenance Programme (AMP) for the aircraft managed.</p> <p>The source EMAR also introduced the concept of the participating Member State (or sovereign nation) determining requirements levied on a CAMO in lieu of the NMAA. This concept allows the military possibilities of the CAMO not producing the AMP – rather it may be generated by another Government organisation.</p> <p>DASR GM M.A.708(b)(2)(ii) provides clarification on amending the AMP.</p>
Proposed new GM text
<p>It is possible that the Aircraft Maintenance Programme (AMP) will be provided to the CAMO for some aircraft types whilst for other aircraft types the AMP is to be 'developed and controlled' by the CAMO. This will be identified by the NMAA on a platform-by-platform basis. In these cases it is possible that the CAMO's responsibilities towards the 'development and control' of the AMP of the aircraft types for which it is responsible will differ. These differences are to be clearly identified in the CAME.</p> <p>The default Defence position is that the CAMO develops and controls the DASA approved AMP for the aircraft managed.</p>

New GM M.A.708 Continuing airworthiness management (AUS)
Rationale
<p>Green text for AMC M.A.201(h) paragraph 4 was derived from EASA AMC/GM Initial issue and Issue 2.</p> <p>AMC M.A.201(h) was deleted from EASA regulations by Issue 2 Amendment 1 to 1321/2014 on the 11 Jul 16, with paragraph 4 contents moved to new GM M.A.708 (EASA considered this material necessary guidance for any CAMO managing the continuing airworthiness of aircraft).</p> <p>As the green text is to be deleted from DASR AMC M.A.201(h) paragraph 4 and EASA has moved paragraph 4 in their regulations to EASA GM M.A.708, new GM M.A.708 to be added to DASR.</p>
Current GM text
Not applicable this is new GM
Proposed new GM text
<p>The CAMO should have adequate knowledge of the design status (type specification, customer options, airworthiness directives (ADs), airworthiness limitations contained in the aircraft instructions for continuing airworthiness, modifications, major repairs, operational equipment) and of the required and performed maintenance. The status of aircraft design and maintenance should be adequately documented to support the performance of the quality system.</p> <p>For CS-25 aeroplanes, adequate knowledge of the airworthiness limitations should cover those contained in CS-25 Book 1, Appendix H, paragraph H25.4 and fuel tank system airworthiness limitations including critical design configuration control limitations (CDCCL).</p>

GM M.A.708(b)(2) Continuing airworthiness management
Rationale
<p>The green text "For clarification, the default Defence position is that the CAMO develops and controls the NMAA approved Aircraft Maintenance Programme (AMP) for the aircraft managed." is to be amended by deleting "For clarification". The third and fourth paragraphs do not provide any clarification and are to be deleted.</p>
Current GM text
<p>It is possible that the AMP will be provided to the CAMO for some aircraft types whilst for other aircraft types the AMP is to be 'developed and controlled' by the CAMO. This will be identified by the NMAA on a platform-by-platform basis. In these cases it is possible that the CAMO's responsibilities towards the 'development and control' of the AMP of the aircraft types for which it is responsible will differ. These differences are to be clearly identified in the CAME.</p> <p>For clarification, the default Defence position is that the CAMO develops and controls the NMAA approved Aircraft Maintenance Programme (AMP) for the aircraft managed.</p> <p>The source EMAR also introduced the concept of the participating Member State (or sovereign nation) determining requirements levied on a CAMO in lieu of the NMAA. This concept allows the military possibilities of the CAMO not producing the AMP – rather it may be generated by another Government organisation.</p> <p>DASR GM M.A.708(b)(2)(ii) provides clarification on amending the AMP.</p>
Proposed new GM text
<p>It is possible that the AMP will be provided to the CAMO for some aircraft types whilst for other aircraft types the AMP is to be 'developed and controlled' by the CAMO. This will be identified by the NMAA on a platform-by-platform basis. In these cases it is possible that the CAMO's responsibilities towards the 'development and control' of the AMP of the aircraft types for which it is responsible will differ. These differences are to be clearly identified in the CAME.</p> <p>The default Defence position is that the CAMO develops and controls the DASA approved Aircraft Maintenance Programme (AMP) for the aircraft managed.</p>

GM M.A.708(b)(2)(ii) Continuing airworthiness management (AUS)

Rationale

Paragraph 2 must be removed as:

1. It is inconsistent with black text DASR 21 regulation - only the MTC holder or Authority has the ability to amend or approve changes to the Master ICA.
2. MDOA holders cannot amend the master ICA, but only ICA supplements for which they are responsible and the servicing intervals contained within.
3. All servicing intervals which are the result of an AwL can only be approved by the Authority as a Major Change to the MTC.

Current GM text

1. Consistent with DASR M.A.704(c) the indirect approval procedure shall define the eligible amendments,(ie scope of changes) to the AMP, be established by the CAMO as part of the CAME and be approved by the NMAA.
2. The requirements for AMP and maintenance data are reflected in DASR 21.A.57—Manuals, DASR 21.A.61—Instructions for Continuing Airworthiness, DASR M.A.304—Data for modifications and repairs, and DASR 145.A.45—Maintenance data. While ICA and manuals are initially produced and distributed by the MTC holder, the authority to amend ICA and manuals depends on their nature as follows:
 - a. Airworthiness Limitations (AwL), Critical Design Configuration Control Limitations (CDCCL) and Certification Maintenance Requirements (CMR) are mandatory requirements identified and set by the NMAA at the point of initial type certification, and hence may only be changed by the NMAA.
 - b. Servicing intervals. The extension of servicing intervals beyond those set at the point of type certification may only be approved by the NMAA, or MDOA holder or equivalent supporting the Military Type-certificate holder. CAMOs may reduce servicing intervals from those set by the MTC holder, eg to combine servicings and package maintenance events, without the MTC holder's approval. CAMOs may also be granted a NMAA privilege through an indirect approval procedure to use Maintenance Steering Group 3 (MSG3) or Reliability Centred Maintenance (RCM) philosophy to amend intervals (including extensions) based on data from similar parts and appliances in service.
 - c. Changes to serviceability criteria such as the type of inspection, amount of acceptable wear, required torque or pressure etc are design changes and hence may only be approved by the applicable MDOA holder or equivalent.

d. Other permitted amendments. Other amendments may be made by the CAMO or DASR 145 AMO or equivalent if there is no material effect to the outcome of the maintenance procedure (including serviceability and other quantitative criteria), for example:

- i. Where the original intent can be carried out in a more practical or efficient manner.
- ii. Where the original intent cannot be achieved by following the instructions as written.
- iii. The use of alternative tools/equipment to that specified.

Proposed new GM text

1. Consistent with DASR M.A.704(c) the indirect approval procedure shall define the eligible amendments (ie scope of changes) to the AMP, be established by the CAMO as part of the CAME and be approved by the NMAA.

NPA 2020-016

**PROPOSED DELETION OF DASR M.A.301(A)(4) CONTINUING
AIRWORTHINESS TASKS TEXT**

M.A.301(a)(4) Continuing Airworthiness tasks

- Delete the green text “approved”.

Amend the content below:

M.A.301(a)(4) Continuing Airworthiness tasks

4. the analysis of the effectiveness of the DASR M.A.302 ~~approved~~ AMP;

NPA 2020-016

**PROPOSED DELETION OF AMC DASR M SUBPART B –
ACCOUNTABILITY TEXT**

AMC M.A.201(d) Responsibilities
Rationale
The green text was in DASR since its release when there was no EMAR AMC, the EMAR AMC 'Qualified person' in this context means an individual who has received appropriate training for the relevant pre-flight inspection tasks to a standard as described in DASR AMC M.A.301(a)(1) subparagraph 3.'. This makes the current DASR green text redundant so it shall be deleted.
Current AMC text
'Qualified person' in this context means an individual who has received appropriate training for the relevant pre-flight inspection tasks to a standard as described in DASR AMC M.A.301(a)(1) subparagraph 3. This is inclusive of the type qualified pilot. Non-pilot aircrew are able to perform the pre-flight inspection subject to a qualification process. The training standard and qualification process for personnel performing the pre-flight inspection should be described in the CAME.
Proposed new AMC text
'Qualified person' in this context means an individual who has received appropriate training for the relevant pre-flight inspection tasks to a standard as described in DASR AMC M.A.301(a)(1) subparagraph 3.

AMC M.A.201(h) Responsibilities (paragraph 4)
Rationale
<p>The green text was derived from EASA AMC/GM Initial issue and Issue 2. Green text retained when EMAR released their AMC Reference U8417679.</p> <p>AMC M.A.201(h) was deleted from EASA regulations by Issue 2 Amendment 1 to 1321/2014 on the 11 Jul 16, with paragraph 4 contents moved to new GM M.A. 708 (EASA considered this material necessary guidance for any CAMO managing the continuing airworthiness of aircraft).</p> <p>The green text shall be deleted from paragraph 4 to align with EMAR.</p> <p>EASA GM M.A.708 Continuing airworthiness management, which includes the green text to be removed from paragraph 4, is to be added as DASR GM M.A708 Continuing airworthiness management.</p>
Current AMC text
<p>4. The CAMO should therefore have adequate knowledge of the design status (type design data, variance in certification basis, service bulletins issued by other relevant MAAs, Airworthiness Directives (AD), airworthiness limitations from the certification programme, ICA airworthiness limitations, eg as described in CS-25 Book 1, Appendix H, paragraph H25.1, fuel tank system airworthiness limitations including Critical Design Configuration Control Limitations (CDCCL), modifications, repairs, operational equipment and, required and performed maintenance). The Status of aircraft design and maintenance should be adequately documented to support the performance of the quality system.</p>
Proposed new AMC text
<p>4. The CAMO should therefore have adequate knowledge of the design status (type design data, Airworthiness Directives (AD), airworthiness limitations from the certification programme, fuel tank system airworthiness limitations including Critical Design Configuration Control Limitations (CDCCL), modifications, repairs, operational equipment and, required and performed maintenance).</p>

AMC M.A.201(h)(1) Responsibilities (paragraph 7)
Rationale
<p>The AMC is derived from EASA AMC and was in the initial DASR release with AUS unique text added to the last sentence. AMC M.A.201(h)1 was deleted from EASA regulations by Issue 2 Amendment 1 to 1321/2014 on the 11 Jul 16.</p> <p>The green text shall be deleted as the original EASA regulation has been deleted. The deletion of the green text does not affect the clarity of the AMC and will align DASR with EMAR.</p>
Current AMC text
<p>7. The Operating Organisation's management controls associated with contracted/tasked continuing airworthiness management activities should be reflected in the associated written contract/tasking and be in accordance with the Operating Organisation's policy and procedures defined in their Continuing Airworthiness Management Exposition (CAME). When such tasks are contracted/tasked the Operating Organisation's continuing airworthiness management system is considered to be extended to the contracted/tasked organisation unless the contracted/tasked organisation is working under their own CAMO approval per DASR M.A.711(a)3.ii.</p>

Proposed new AMC text

7. The Operating Organisation's management controls associated with contracted/tasked continuing airworthiness management activities should be reflected in the associated written contract/tasking and be in accordance with the Operating Organisation's policy and procedures defined in their Continuing Airworthiness Management Exposition (CAME). When such tasks are contracted/tasked the Operating Organisation's continuing airworthiness management system is considered to be extended to the contracted/tasked organisation.

AMC M.A.201(h)(1) Responsibilities (paragraph 9)

Rationale

The green text in DASR was originally inserted to provide extra information about contracting. AMC M.A.201(h)1 was deleted from EASA regulation by Issue 2 Amendment 1 to 1321/2014 on the 11 Jul 16 and it is likely EMAR would also be amended to align with EASA in the future. It is recommended that the DASR unique green text be deleted as it is not AMC but rather GM about contracting.

Current AMC text

Contracts/taskings should not authorise the contracted/tasked organisation to further contract/task to other organisations elements of the continuing airworthiness management tasks. **To clarify in ADF context, when CASG are contracting a through life support (TLS) provider, CASG are acting as a contracting arm of the Operating Organisation.**

Proposed new AMC text

Contracts/taskings should not authorise the contracted/tasked organisation to further contract/task to other organisations elements of the continuing airworthiness management tasks.

AMC M.A.201(k) Responsibilities (paragraph 5.2. Obligations of the Operating Organisation:)

Rationale

The paragraphs in DASR are not suitable as AMC and shall be changed to align with EMAR.
Paragraphs 5.2.1, 5.2.2, 5.2.5 shall be changed to NOT APPLICABLE to align with EMAR
Paragraph 5.2.6 delete "aircraft continuing airworthiness record system" as the generic term "aircraft technical log" is sufficient to indicate the document used to report to the CAMO.

Current AMC text

5.2. Obligations of the Operating Organisation:

1. have a general understanding of the approved maintenance programme;
2. have a general understanding of this DASR M;
3. present the aircraft to the DASR 145 AMO agreed with the CAMO at the due time designated by the CAMO's request;
4. not modify the aircraft without first consulting the CAMO;
5. inform the CAMO of all maintenance exceptionally carried out without the knowledge and control of the CAMO;
6. report to the CAMO through the aircraft technical log / aircraft continuing airworthiness record system all defects found during operations;
7. inform the NMAA whenever the present arrangement is denounced by either party;
8. inform the NMAA and the CAMO whenever the aircraft is no longer operated by the Operating Organisation;
9. carry out all applicable mandated occurrence reporting;
10. inform on a regular basis the CAMO about the aircraft flying hours and any other utilisation data, as agreed with the CAMO;
11. NOT APPLICABLE;
12. NOT APPLICABLE.

Proposed new AMC text

5.2. Obligations of the Operating Organisation:

1. NOT APPLICABLE;
2. NOT APPLICABLE;
3. present the aircraft to the DASR 145 AMO agreed with the CAMO at the due time designated by the CAMO's request;
4. not modify the aircraft without first consulting the CAMO;
5. NOT APPLICABLE;
6. report to the CAMO through the aircraft technical log all defects found during operations;
7. inform the NMAA whenever the present arrangement is denounced by either party;
8. inform the NMAA and the CAMO whenever the aircraft is no longer operated by the Operating Organisation;
9. carry out all applicable mandated occurrence reporting;
10. inform on a regular basis the CAMO about the aircraft flying hours and any other utilisation data, as agreed with the CAMO;

11. NOT APPLICABLE;
12. NOT APPLICABLE.

AMC M.A.201(k) Responsibilities (paragraph 6)

Rationale

The green text at the end of the paragraph in DASR is not AMC and shall be deleted so the paragraph aligns with EMAR.

Current AMC text

6. The contracted / tasked CAMO should be approved in accordance with DASR M.A. Subpart G. However, this approval does not prevent the CAMO contracting / tasking certain continuing airworthiness management tasks to other competent organisations. This activity is considered as an integral element of the CAMO's DASR M.A. Subpart G approval. The regulatory monitoring is exercised through the CAMO's DASR M.A. Subpart G approval. The contracts / tasks should be acceptable to the NMAA. Contracts / taskings should not authorise the contracted/tasked organisation to further contract / task to other organisations elements of the continuing airworthiness management tasks. Appendix II to DASR AMC M.A.201(h)1 provides information on the contracting / tasking of continuing airworthiness management. **To clarify in ADF context, when CASG are contracting a through life support (TLS) provider, CASG are acting as a contracting arm of the Operating Organisation.**

Proposed new AMC text

6. The contracted / tasked CAMO should be approved in accordance with DASR M.A. Subpart G. However, this approval does not prevent the CAMO contracting / tasking certain continuing airworthiness management tasks to other competent organisations. This activity is considered as an integral element of the CAMO's DASR M.A. Subpart G approval. The regulatory monitoring is exercised through the CAMO's DASR M.A. Subpart G approval. The contracts / tasks should be acceptable to the NMAA. Contracts / taskings should not authorise the contracted/tasked organisation to further contract / task to other organisations elements of the continuing airworthiness management tasks. Appendix II to DASR AMC M.A.201(h)1 provides information on the contracting / tasking of continuing airworthiness management.

AMC M.A.202(a) Occurrence reporting

Rationale

DAVENG recommend that the last paragraph could be deleted as the intent of this paragraph is to provide guidance to assist CAMOs in determining what constitutes a reportable occurrence. GM M.A.202(a) already directs readers to the guidance in BR Appendix 1 Sections II and III, which includes sufficient and more extensive examples of reportable occurrences for structures and propulsion.

As per the DAVENG recommendation the green text shall be deleted.

Current AMC text

Operating Organisations should ensure that the (Military) Type Certificate ((M)TC) holder **or the organisation responsible for the design of the aircraft or component** receives adequate reports of occurrences for that aircraft type, to enable the M(TC) holder to fulfil its DASR 21 obligations.

Liaison with the (M)TC holder should be established to determine whether published or proposed service information will resolve the problem or to obtain a solution to a particular problem.

An approved CAMO should assign responsibility for co-ordinating action on airworthiness occurrences and for initiating any necessary further investigation and follow-up activity to a qualified person with clearly defined authority and status.

'Qualified person' in this context means an individual who has received appropriate training and has relevant experience in the management of airworthiness occurrences detailed in DASR M.A.202. In the case of a contracted/tasked CAMO, close coordination between the CAMO and the Operating Organisation is needed to define the appropriate training and relevant experience and to ensure that such person is officially on record at the CAMO.

'Endanger flight safety' means any instance where safe operation could not be assured or which could lead to an unsafe condition. It typically includes, but is not limited to, significant cracking, deformation, corrosion or failure of primary structure, any evidence of burning **(including overheating)**, electrical arcing, significant hydraulic fluid or fuel leakage and any emergency system or total system failure. An Airworthiness Directive overdue for compliance is also considered a hazard to flight safety.

For Aircraft Structural and Propulsion Systems Integrity, unless there is pre-approved data from a DASR21J Approved Design Organisation or equivalent (including pre-approved repairs in the Structural Repair manual, Service Bulletins, Airworthiness Directives, etc.), it should be assumed that any structural non-compliance to Critical Structure, Primary Structure or Principle Structural Elements (PSE), could 'endanger flight safety'. Definition of what constitutes Critical Aircraft Structure may be found in the weapon system approved Aircraft Structural Integrity Management Plan (ASIMP), while Critical Propulsion System Parts may be found in the Guidance Material to DASR 21.A.41.

Proposed new AMC text

Operating Organisations should ensure that the (Military) Type Certificate ((M)TC) holder or the organisation responsible for the design of the aircraft or component receives adequate reports of occurrences for that aircraft type, to enable the M(TC) holder to fulfil its DASR 21 obligations.

Liaison with the (M)TC holder should be established to determine whether published or proposed service information will resolve the problem or to obtain a solution to a particular problem.

An approved CAMO should assign responsibility for co-ordinating action on airworthiness occurrences and for initiating any necessary further investigation and follow-up activity to a qualified person with clearly defined authority and status.

'Qualified person' in this context means an individual who has received appropriate training and has relevant experience in the management of airworthiness occurrences detailed in DASR M.A.202. In the case of a contracted/tasked CAMO, close coordination between the CAMO and the Operating Organisation is needed to define the appropriate training and relevant experience and to ensure that such person is officially on record at the CAMO.

'Endanger flight safety' means any instance where safe operation could not be assured or which could lead to an unsafe condition. It typically includes, but is not limited to, significant cracking, deformation, corrosion or failure of primary structure, any evidence of burning (including overheating), electrical arcing, significant hydraulic fluid or fuel leakage and any emergency system or total system failure. An Airworthiness Directive overdue for compliance is also considered a hazard to flight safety.

NPA 2020-016

**PROPOSED DELETION OF AMC DASR M SUBPART C –
CONTINUING AIRWORTHINESS TEXT**

AMC M.A.301(a)(1) Continuing airworthiness tasks (paragraph 1.a.)
Rationale
The green text is a note added to the end of the paragraph stating that a pre-flight inspection is not maintenance. Paragraph 3 of the AMC states that the operating organisation should publish guidance to personnel performing pre-flight inspections defining their responsibilities. Therefore the green text shall be deleted as it adds no value.
Current AMC text
a walk-around type inspection of the aircraft, its emergency equipment and any stores/weapons carried for condition including, in particular, any obvious signs of wear, damage or leakage. In addition, the presence of all required equipment, including emergency equipment, should be established and the security of attachment of any stores/weapons carried should be checked. Note, the pre-flight inspection is not considered maintenance, it is a continuing airworthiness task;
Proposed new AMC text
a walk-around type inspection of the aircraft, its emergency equipment and any stores/weapons carried for condition including, in particular, any obvious signs of wear, damage or leakage. In addition, the presence of all required equipment, including emergency equipment, should be established and the security of attachment of any stores/weapons carried should be checked.

AMC M.A.301(a)5(iii) Continuing airworthiness tasks
Rationale
The green text is a specific reference to DAAD. The green text shall be deleted as the second paragraph states "any other continued airworthiness requirement made mandatory by the NMAA".
Current AMC text
Operational directives with a continuing airworthiness impact include operating rules such as Extended Twin-engine Operations (ETOPS) / Long Range Operations (LROPS), Reduced Vertical Separation Minima (RVSM), Minimum Navigation Performance Specification (MNPS), All Weather Operations (AWOPS), Area Navigation (RNAV), etc. Any other continued airworthiness requirement made mandatory by the NMAA includes (M)TC related requirements such as: Certification Maintenance Requirements (CMR), certification life limited parts, airworthiness limitations from the aircraft type-certification basis, fuel tank system airworthiness limitations including Critical Design Configuration Control Limitations (CDCCL), etc. Defence Aviation Authority Directives are considered operational directives that may have a continuing airworthiness impact.

Proposed new AMC text

Operational directives with a continuing airworthiness impact include operating rules such as Extended Twin-engine Operations (ETOPS) / Long Range Operations (LROPS), Reduced Vertical Separation Minima (RVSM), Minimum Navigation Performance Specification (MNPS), All Weather Operations (AWOPS), Area Navigation (RNAV), etc.

Any other continued airworthiness requirement made mandatory by the NMAA includes (M)TC related requirements such as: Certification Maintenance Requirements (CMR), certification life limited parts, airworthiness limitations from the aircraft type-certification basis, fuel tank system airworthiness limitations including Critical Design Configuration Control Limitations (CDCCL), etc

AMC M.A.302(d) Aircraft Maintenance Programme
Rationale
A Reliability Centred Maintenance report could be considered to be an equivalent report. Therefore the associated green text should be deleted. Green text related to AMP will be moved to Advisory Circular Aircraft Maintenance Programme and Reliability Programme.
Current AMC text
<p>1. An Operating Organisation's AMP should normally be based upon the Maintenance Review Board (MRB)/Reliability Centred Maintenance (RCM) report or equivalent report where applicable, the Maintenance Planning Document (MPD), the relevant chapters of the maintenance manual or any other maintenance data containing information on scheduling. Furthermore, an Operating Organisation's AMP should also take into account any maintenance data containing information on scheduling for components.</p> <p>2. Instructions issued by the NMAA can encompass all types of instructions from a specific task for a particular aircraft to complete recommended maintenance schedules for certain aircraft types that can be used by the CAMO directly. These instructions may be issued by the NMAA in the following cases:</p> <ul style="list-style-type: none"> - in the absence of specific recommendations of the (Military) Type Certificate Holder; - to provide alternative instructions to those described in the subparagraph 1 above, with the objective of providing flexibility to the Operating Organisation. <p>3. Where an aircraft type has been subjected to the MRB/RCM report process, the initial AMP should normally be based upon the MRB/RCM report.</p> <p>4. Where an aircraft is maintained in accordance with an AMP based upon the MRB/RCM report process, any associated programme for the continuous surveillance of the reliability, or health monitoring of the aircraft should be considered as part of the AMP.</p> <p>5. AMPs for aircraft types subjected to the MRB/RCM report process should contain identification cross reference to the MRB/RCM report tasks such that it is always possible to relate such tasks to the current AMP. This does not prevent the AMP from being developed in the light of service experience to beyond the MRB/RCM report recommendations but will show the relationship to such recommendations. However, consideration should also be given to Defence Configuration, Role, and operating Environment (CRE) and scheduled utilisation compared with the assumptions used at the commencement of the MRB/RCM process.</p> <p>6. Some AMPs, not developed from the MRB/RCM process, utilise reliability programmes. Such reliability programmes should be considered as a part of the AMP.</p> <p>7. Alternative and/or additional instructions to those defined in DASR M.A.302(d)1 and (2), proposed by the Operating Organisation, may include but are not limited to the following:</p> <ul style="list-style-type: none"> - Extension of the interval for certain tasks based on reliability data or other supporting information. Appendix I recommends that the AMP contains the corresponding extension procedures. The extension in periodicity of these tasks is directly approved by the NMAA, including ALIs (Airworthiness Limitation Items). - Reduced intervals from those proposed by the (M)TC holder as a result of the reliability data or because of a more stringent operational environment. - Additional tasks at the discretion of the Operating Organisation.

- For Aircraft Structural Integrity, Airworthiness Limitations are cited in the weapon system approved Aircraft Structural Integrity Management Program (ASIMP), while cited in the TCDS for the affected Propulsion System. Airworthiness Limitations (including safe life limit or safety by inspection program parameter for aircraft structure and dynamic components as defined in the weapon system ASIMP, critical inspection requirements or retirement times of propulsion system critical parts as defined in DASR GM 21.A.41— Type-certificate and restricted type-certificate, CMRs or other Airworthiness Limitations) are outside the scope of the reliability program and cannot be modified without engagement of an approved design organisation and NMAA approval.
- Note: Take care with escalation for Structural Integrity. Structure requires different logic to systems, especially for 'nil findings'. For ASI, a history of 'nil findings' on an aircraft is not evidence for escalation of the inspection interval, because it is not evidence that there is any conservatism in any of the variables in the ICA's 'damage tolerance' analysis. The chance of damage developing and growing only increases with time.

8. 'Field Evaluation' data from other military Operating Organisations using the same aircraft type in a similar manner may have been used to develop an initial Aircraft Maintenance Programme. However, where an aircraft has been procured from a foreign nation, security constraints or other nationally imposed limitations may result in a lack of complete data being available to support the AMP. In these cases, the Operating Organisation should **evaluate the available data and confirm that appropriate controls exist, or identify additional data that implements necessary controls, so that associated risks are either eliminated or minimised So Far As is Reasonably Practicable (SFARP)**.

Proposed new AMC text

1. An Operating Organisation's AMP should normally be based upon the Maintenance Review Board (MRB) report or equivalent report where applicable, the Maintenance Planning Document (MPD), the relevant chapters of the maintenance manual or any other maintenance data containing information on scheduling. Furthermore, an Operating Organisation's AMP should also take into account any maintenance data containing information on scheduling for components.
2. Instructions issued by the NMAA can encompass all types of instructions from a specific task for a particular aircraft to complete recommended maintenance schedules for certain aircraft types that can be used by the CAMO directly. These instructions may be issued by the NMAA in the following cases:
 - in the absence of specific recommendations of the (Military) Type Certificate Holder;
 - to provide alternative instructions to those described in the subparagraph 1 above, with the objective of providing flexibility to the Operating Organisation.
3. Where an aircraft type has been subjected to the MRB report process, the initial AMP should normally be based upon the MRB report.
4. Where an aircraft is maintained in accordance with an AMP based upon the MRB report process, any associated programme for the continuous surveillance of the reliability, or health monitoring of the aircraft should be considered as part of the AMP.

5. AMPs for aircraft types subjected to the MRB report process should contain identification cross reference to the MRB report tasks such that it is always possible to relate such tasks to the current AMP. This does not prevent the AMP from being developed in the light of service experience to beyond the MRB report recommendations but will show the relationship to such recommendations.

6. Some AMPs, not developed from the MRB process, utilise reliability programmes. Such reliability programmes should be considered as a part of the AMP.

7. Alternative and/or additional instructions to those defined in DASR M.A.302(d)1 and (2), proposed by the Operating Organisation, may include but are not limited to the following:

- Extension of the interval for certain tasks based on reliability data or other supporting information. Appendix I recommends that the AMP contains the corresponding extension procedures. The extension in periodicity of these tasks is directly approved by the NMAA, including ALIs (Airworthiness Limitation Items).

- Reduced intervals from those proposed by the (M)TC holder as a result of the reliability data or because of a more stringent operational environment

- Additional tasks at the discretion of the Operating Organisation.

- For Aircraft Structural Integrity, Airworthiness Limitations are cited in the weapon system approved Aircraft Structural Integrity Management Program (ASIMP), while cited in the TCDS for the affected Propulsion System. Airworthiness Limitations (including safe life limit or safety by inspection program parameter for aircraft structure and dynamic components as defined in the weapon system ASIMP, critical inspection requirements or retirement times of propulsion system critical parts as defined in DASR GM 21.A.41—Type-certificate and restricted type-certificate, CMRs or other Airworthiness Limitations) are outside the scope of the reliability program and cannot be modified without engagement of an approved design organisation and NMAA approval.

- Note: Take care with escalation for Structural Integrity. Structure requires different logic to systems, especially for 'nil findings'. For ASI, a history of 'nil findings' on an aircraft is not evidence for escalation of the inspection interval, because it is not evidence that there is any conservatism in any of the variables in the ICA's 'damage tolerance' analysis. The chance of damage developing and growing only increases with time.

8. 'Field Evaluation' data from other military Operating Organisations using the same aircraft type in a similar manner may have been used to develop an initial Aircraft Maintenance Programme. However, where an aircraft has been procured from a foreign nation, security constraints or other nationally imposed limitations may result in a lack of complete data being available to support the AMP. In these cases, the Operating Organisation should evaluate the available data and confirm that appropriate controls exist, or identify additional data that implements necessary controls, so that associated risks are either eliminated or minimised So Far As is Reasonably Practicable (SFARP).

AMC M.A.305(d) Aircraft continuing airworthiness record system (text after paragraph (i))

Rationale

DAVENG recommend deleting the green text as associated ICA cited in the AMP (flight manual, AMM) is expected to adequately advise the requirements for and means of accomplishing a symmetry check.

Therefore the green text shall be deleted.

Current AMC text

A symmetry check is equivalent to a mensuration check or alignment check which is typically covered in the applicable Aircraft Maintenance Programme (AMP).

Some gas turbine engines are assembled from modules and a true total time in service for a total engine is not kept. When Operating Organisations wish to take advantage of the modular design, then total time in service and maintenance records for each module are to be maintained. The continuing airworthiness records as specified are to be kept with the module and should show compliance with any mandatory requirements pertaining to that module.

For some gas turbine engines, especially turbo-shaft engines, the true total time of continuous operation for particular power settings is to be maintained if applicable.

Proposed new AMC text

Some gas turbine engines are assembled from modules and a true total time in service for a total engine is not kept. When Operating Organisations wish to take advantage of the modular design, then total time in service and maintenance records for each module are to be maintained. The continuing airworthiness records as specified are to be kept with the module and should show compliance with any mandatory requirements pertaining to that module.

For some gas turbine engines, especially turbo-shaft engines, the true total time of continuous operation for particular power settings is to be maintained if applicable.

AMC M.A.305(d)(5) Aircraft continuing airworthiness record system (AUS)

Rationale

The regulation clause is a simple clear statement and the current AMC adds no additional clarity and shall be deleted.

Current AMC text

The weight and balance statement should be the current aircraft weight factoring in the last weigh and any subsequent changes (modifications, component removals etc), for example the aircraft weight and balance Chart C (if used).

Proposed new AMC text

Delete AMC M.A.305(d)(5) Aircraft continuing airworthiness record system (AUS) in toto.

NPA 2020-016

**PROPOSED DELETION OF AMC DASR M SUBPART G –
CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION
(CAMO) TEXT**

AMC M.A.707(a) Airworthiness review staff (paragraph 4)
Rationale
Has been in DASR since 31 Jan 17. In the Sep 17 release the text was to be retained until the full release of DASR 66. As DASR 66 has been released the text is no longer relevant to the AMC and shall be deleted.
Current AMC text
4. An appropriate MAML in compliance with DASR 66 is any one of the following: <ul style="list-style-type: none">• a category B1 licence in the subcategory of the aircraft reviewed, or• a category B2 or C licence. It is not necessary to satisfy the experience requirements of DASR 66.A.20(b)(2) at the time of the review. <p>Note: A 'national equivalent' to DASR 66 licence is defined in DASR 145.A.30— Personnel requirements.</p>
Proposed new AMC text
4. An appropriate MAML in compliance with DASR 66 is any one of the following: <ul style="list-style-type: none">• a category B1 licence in the subcategory of the aircraft reviewed, or• a category B2 or C licence. It is not necessary to satisfy the experience requirements of DASR 66.A.20(b)(2) at the time of the review.

AMC M.A.707(a)(1)(iii) Airworthiness review staff
Current AMC text
Rationale
The associated regulation clause requires staff to have acquired formal aeronautical maintenance training. The AMC lists the relevant training and the green text is knowledge of the Type Design. As agreed by DIA this not a type of training. The green text shall be deleted. For consistency with EMAR the start of the dot points shall be changed to lower case.
<p>Formal aeronautical maintenance training means training (internal or external) supported by evidence on the following subjects:</p> <ul style="list-style-type: none"> - Relevant parts of initial and continuing airworthiness regulations; and - Relevant parts of operational requirements and procedures, if applicable; and - The CAME; and - knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to DASR 66 Appendix III Level 1 General Familiarisation and could be imparted by a DASR 147 MTO, by the manufacturer, or by any other organisation accepted by the NMAA; and - Maintenance methods; and - Knowledge of the aircraft's type design approved by the MAA / (M)TC holder.
Proposed new AMC text
<p>Formal aeronautical maintenance training means training (internal or external) supported by evidence on the following subjects:</p> <ul style="list-style-type: none"> - relevant parts of initial and continuing airworthiness regulations; and - relevant parts of operational requirements and procedures, if applicable; and - the CAME; and - knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to DASR 66 Appendix III Level 1 General Familiarisation and could be imparted by a DASR 147 MTO, by the manufacturer, or by any other organisation accepted by the NMAA; and - maintenance methods.

AMC M.A.708(b)(3) Continuing airworthiness management (AUS)
Rationale
The regulation clause is related to the accomplishment of modifications and repairs and list the requirements in the actual performance of these tasks. The AMC adds no value as any modification or repair must be performed by a DASR 145 IAW applicable instructions. The AMC shall be deleted.
Current AMC text
When managing the accomplishment of modifications or repairs the organisation should ensure that Critical Design Configuration Control Limitations (CDCCL) (if applicable) are taken into account.
Proposed new AMC text
Delete AMC M.A.708(b)(3) Continuing airworthiness management (AUS) in toto.

AMC M.A.710(a) Airworthiness review (paragraph 1)
Rationale
<p>DASR September 2017 release was to incorporate EMAR AMC therefore the DASR green text shall be deleted. RAMP team also agreed that the text “and associated reliability program” is not required as associated reliability program would be included in the AMP.</p>
Current AMC text
<p>A review is a check of at least the following categories of documents:</p> <ul style="list-style-type: none"> - registration papers (where applicable); - DASR M.A.305 aircraft continuing airworthiness record system; - DASR M.A.306 aircraft technical log; - list of deferred defects, MEL and CDL (if applicable); - aircraft flight manual and / or any other manuals required by the NMAA including aircraft configuration; - AMP and associated reliability program; - maintenance data; - relevant work packages; - AD status; - modification and SB status (or national equivalent); - modification and repair approval sheets; - list of service life-limited components (to include list of engine and / or propeller modules where appropriate); - relevant DASR Form 1s or equivalent; - weight and balance report and installed equipment list; - aircraft, engine and propeller (M)TC Data Sheets; - if applicable, latest symmetry report. <p>As a minimum, sample checks within each document category should be carried out. If discrepancies are found during the sample check, further investigation should be carried out to the extent necessary to determine the level of the discrepancy and such discrepancies are to be recorded within the organisations QMS findings management system.</p>
Proposed new AMC text
<p>A review is a check of at least the following categories of documents:</p> <ul style="list-style-type: none"> - registration papers (where applicable); - DASR M.A.305 aircraft continuing airworthiness record system; - DASR M.A.306 aircraft technical log; - list of deferred defects, MEL and CDL (if applicable); - aircraft flight manual and / or any other manuals required by the NMAA including aircraft configuration; - AMP; - maintenance data; - relevant work packages;

- AD status;
- modification and SB status (or national equivalent);
- modification and repair approval sheets;
- list of service life-limited components (to include list of engine and / or propeller modules where appropriate);
- relevant DASR Form 1s or equivalent;
- weight and balance report and installed equipment list;
- aircraft, engine and propeller (M)TC Data Sheets;
- if applicable, latest symmetry report.

As a minimum, sample checks within each document category should be carried out.

AMC M.A.710(b) and (c) Airworthiness review (paragraph 4)
Rationale
EMAR and EASA both have similar AMC and neither have anything matching the DASR green text. The green text does not add any additional clarity and shall be deleted.
Current AMC text
4. To ensure compliance the physical survey of the aircraft may include relevant sample checks of items. The relevant physical sample checks of items should be comparing the aircraft condition and configuration in relation to the samples identified and checked during the document review conducted in DASR M.A.710(a).
Proposed new AMC text
4. To ensure compliance the physical survey of the aircraft may include relevant sample checks of items.

AMC M.A.711(b) Privileges of the organisation (AUS)
Rationale
Derived from EASA AMC Annex I (PART-M) to Regulation (EU) No 1321/2014 Issue 2 of 17 Dec 2015 Annex I to ED Decision 2015/029/R. The AMC is also not applicable in EMAR. As ADF CAMOs conduct airworthiness reviews the green text AMC shall be deleted.
Current AMC text
An organisation may be approved for the privileges of DASR M.A.711(a) only, without the privilege to carry out airworthiness reviews. The conduct of airworthiness reviews can be contracted to another appropriately approved CAMO (for that aircraft type). In these instances, the subcontracted CAMO issues a recommendation for the airworthiness review to the NMAA.
In order to be approved for the privileges of DASR M.A.711(b) for a particular aircraft type, it is necessary to be approved for the privileges of DASR M.A.711(a) for that aircraft type. As a consequence, the normal situation in this case is that the organisation will be performing continuing airworthiness management tasks and performing airworthiness reviews on every aircraft type contained in the approval certificate.
Proposed new AMC text
Delete AMC M.A.711(b) Privileges of the organisation (AUS) in toto.

Appendix XI to AMC M.A.708(c) - Contracted/tasked maintenance

Paragraph 2.20 Release to service documentation

Rationale

The last point shall be deleted as the listed dot points are not intended to be an exhaustive list and maintenance visit report is not a defined term.

Current AMC text

2.20 Release to service documentation

The release to service has to be performed by the DASR 145 AMO in accordance with its MOE procedures. The contract/tasking should, however, specify which aircraft documentation should be used (e.g. Aircraft technical log,) and the documentation the DASR 145 AMO should provide to the CAMO upon delivery of the aircraft. This may include, but not limited to:

- Certificate of Release to Service — mandatory,
- maintenance check flight report,
- list of modifications embodied,
- list of repairs,
- list of ADs incorporated,
- engine test report.
- maintenance visit report.

Proposed new AMC text

2.20 Release to service documentation

The release to service has to be performed by the DASR 145 AMO in accordance with its MOE procedures. The contract/tasking should, however, specify which aircraft documentation should be used (e.g. Aircraft technical log,) and the documentation the DASR 145 AMO should provide to the CAMO upon delivery of the aircraft. This may include, but not limited to:

- Certificate of Release to Service — mandatory,
- maintenance check flight report,
- list of modifications embodied,
- list of repairs,
- list of ADs incorporated,
- engine test report.

NPA 2020-016

PROPOSED DELETION OF AMC APPENDIX I TO DASR AMC M.A.302 - CONTENT OF THE AIRCRAFT MAINTENANCE PROGRAM TEXT

Paragraph 2. Aircraft Maintenance Plan Basis
Rationale
As per AMC M.A.302(d) Aircraft Maintenance Programme green text RCM shall be deleted.
Current AMC text
<p>2.1 An AMP should normally be based upon the MRB / RCM report (or equivalent), where applicable, and the MTC holder MPD or the manufacturer's recommended maintenance programme.</p> <p>The structure and format of these maintenance recommendations may be re-written to better suit the operation and control of the particular AMP.</p> <p>2.2 For a newly type-certificated aircraft where no previously approved AMP exists, it will be necessary to comprehensively appraise the manufacturer's recommendations (and the MRB / RCM report or equivalent where applicable), together with other airworthiness information, in order to produce a realistic AMP for approval.</p>
Proposed new AMC text
<p>2.1 An AMP should normally be based upon the MRB report (or equivalent), where applicable, and the MTC holder MPD or the manufacturer's recommended maintenance programme.</p> <p>The structure and format of these maintenance recommendations may be re-written to better suit the operation and control of the particular AMP.</p> <p>2.2 For a newly type-certificated aircraft where no previously approved AMP exists, it will be necessary to comprehensively appraise the manufacturer's recommendations (and the MRB report or equivalent where applicable), together with other airworthiness information, in order to produce a realistic AMP for approval.</p>

Paragraph 5. Periodic review of AMP contents (paragraph 5.1)
Rationale
As per AMC M.A.302(d) Aircraft Maintenance Programme green text RCM shall be deleted.
Current AMC text
5.1 Approved AMPs should be subject to periodic review to ensure that they reflect current M(S)TC holder recommendations, revisions to the MRB / RCM report (or equivalent) if applicable, mandatory requirements and the maintenance needs of the aircraft.
Proposed new AMC text
5.1 Approved AMPs should be subject to periodic review to ensure that they reflect current M(S)TC holder recommendations, revisions to the MRB report (or equivalent) if applicable, mandatory requirements and the maintenance needs of the aircraft.

Paragraph 6.2 Applicability for small fleets of aircraft (paragraph 6.2.5(b), 3rd dot point)
Rationale
Review by RAMP it is well understood now that "Operating Organisations/CAMOs of the same aircraft type" extends to international equivalents/operators. Therefore it is not necessary to specifically mention international equivalents as such shall be deleted.
Current AMC text
- In making an engineering judgement, contact should be established and comparisons made with other Operating Organisations/CAMOs (or international equivalents) of the same aircraft type, where possible and relevant. Making comparison with data provided by the manufacturer may also be possible.
Proposed new AMC text
- In making an engineering judgement, contact should be established and comparisons made with other Operating Organisations/CAMOs of the same aircraft type, where possible and relevant. Making comparison with data provided by the manufacturer may also be possible.

Paragraph 6.2 Applicability for small fleets of aircraft (paragraph 6.2.6)
Rationale
Review by RAMP it is well understood now that "other CAMO(s) or Operating Organisations" extends to other Military Operating Organisations such as USN, USAF, etc. Therefore it is not necessary to specifically mention international equivalents as such shall be deleted.
Current AMC text
6.2.6 In order to obtain accurate reliability data, it should be recommended to pool data and analysis with one or more other Operating Organisations/CAMOs, eg other Military Operating Organisation such as USN. Paragraph 6.6 of this Appendix specifies under which conditions it is acceptable that Operating Organisations/CAMOs share reliability data.
Proposed new AMC text
6.2.6 In order to obtain accurate reliability data, it should be recommended to pool data and analysis with one or more other Operating Organisations/CAMOs. Paragraph 6.6 of this Appendix specifies under which conditions it is acceptable that Operating Organisations/CAMOs share reliability data.

6.3 Engineering Judgement (paragraph 6.3.1)
Rationale
Review by RAMP it is well understood now that responsibilities with respect to the AMP maybe contracted out to another organisation. Therefore it is not necessary to specifically mention other organisations under contract as such shall be deleted.
Current AMC text
6.3.1 Engineering judgement is itself inherent to reliability programmes as no interpretation of data is possible without judgement. In approving the maintenance and reliability programmes, the NMAA is expected to ensure that the organisation responsible for developing and controlling the AMP (or organisation under contract) has sufficiently qualified personnel with appropriate engineering experience and understanding of reliability concepts.
Proposed new AMC text
6.3.1 Engineering judgement is itself inherent to reliability programmes as no interpretation of data is possible without judgement. In approving the maintenance and reliability programmes, the NMAA is expected to ensure that the organisation responsible for developing and controlling the AMP has sufficiently qualified personnel with appropriate engineering experience and understanding of reliability concepts.

6.5.5 Performance Standards and Establishing Alert Levels

Rationale

As per RAMP review 6.5.5 Performance Standards and Establishing Alert Levels can be deleted as the text is information only. This information is to be moved to Advisory Circular Aircraft Maintenance Programme and Reliability Programme.

Current AMC text

6.5.5 Performance Standards and Establishing Alert Levels

6.5.5.1 Performance standards/alerts require engineering judgement for their application and typically apply to component monitoring, Pilot Reports, etc. A reliability alert level (or equivalent title, eg Performance Standard, Control Level, Reliability Index, Upper Limit, is purely an indicator, which when exceeded indicates that there has been an apparent deterioration in the normal behaviour pattern of the item with which it is associated. There are several recognised methods of calculating alert levels, any one of which may be used provided that the method chosen is fully defined in the CAME.

6.5.5.2 Alert levels should, where possible, be based on the number of events, which have occurred during a representative period of safe operation of the aircraft fleet. They should be up-dated periodically to reflect operating experience, product improvement and changes in procedures etc.

6.5.5.3 When establishing alert levels based on operating experience, the normal period of operation taken is between two and three years dependent on fleet size and utilisation. The alert levels should usually be so calculated as to be appropriate to events recorded in one- monthly or three-monthly periods of operation. Large fleets will generate sufficient information much sooner than small fleets.

6.5.5.4 Where there is insufficient operating experience, or when a program for a new aircraft type is being established, the following approach may be used:

(a) For a new aircraft type, during the first two years of operation, alert levels should be established in conjunction with the aircraft type certificate holder and Operating Organisations experience if appropriate and should be closely monitored for effectiveness during the induction period. Program data should still be accumulated for future use.

(b) For an established aircraft type with a new Operating Organisation, the experience of other Operating Organisations may be utilised until the new Operating Organisation has accumulated a sufficient period of own experience. Alternatively, experience gained from operation of a similar aircraft model may be used.

6.5.5.5 While setting alert levels for the latest aircraft designs, computed values based on the degree of system and component in-service expected reliability assumed in the design of the aircraft might also be used. These computed values are normally quoted in terms of Mean Time Between Unscheduled Removals or Mean Time Between Failure, for both individual components and complete systems. These initial predictions should be replaced when sufficient in-service experience has been accumulated.

6.5.5.6 When an alert level is exceeded an assessment should be made to determine if corrective action should be taken. It is important to realise that alert levels are not minimum acceptable airworthiness levels. When alert levels are based on a representative period of safe operation (during which failures may well have occurred) they may be considered as a form of protection against erosion of the design aims of the aircraft in terms of system function availability. In the case of a system designed to a multiple redundancy philosophy it should not be misunderstood that, as redundancy exists, an increase in failure rate can always be tolerated without corrective action being taken.

6.5.5.7 Alert levels can range from 0.00 failure rate per 1,000 hours both for important components, where failures in service have been extremely rare, and to perhaps as many as 70 Pilot Reports per 1,000 hours on a systems basis for ATA 100 Chapter 25 - Equipment/Furnishings, or for 20 removals of passenger entertainment units in a like period. For structural or significant non-routine findings from major checks, a non-statistical review may identify an alert condition.

6.5.5 Performance Standards and Establishing Alert Levels (continued)
Proposed new AMC text
Delete paragraph 6.5.5 Performance Standards and Establishing Alert Levels (including sub paragraphs 6.5.5.1 to 6.5.5.7) in toto.

6.5.6 Recalculation of Alert Levels
Rationale
As per RAMP review 6.5.6 Recalculation of Alert Levels can be deleted as the text is information only. This information is to be moved to Advisory Circular Aircraft Maintenance Programme and Reliability Programme.
Current AMC text
<p>6.5.6 Recalculation of Alert Levels</p> <p>6.5.6 .1 Both the method used for establishing an alert level, and the associated qualifying period, apply when the level is re-calculated to reflect current operating experience. However if, during the period between re-calculation of an alert level, a significant change in the reliability of an item is experienced which may be related to the introduction of a known action, eg modification, changes in maintenance or operating procedures, then the alert level applicable to the item should be re-assessed and revised on the data subsequent to the change.</p> <p>6.5.6.2 Procedures for changes in alert levels should be outlined in the approved reliability program and the procedures, periods and conditions for re-calculation should be defined in each program.</p>
Proposed new AMC text
Delete paragraph 6.5.6 Recalculation of Alert Levels (including sub paragraphs 6.5.6.1 to 6.5.6.2) in toto.

6.5.13 Evaluation and review (last sub paragraph (h))
Rationale
RAMP review recommended remove "(h) Changes to configuration, role or operating environment". Reason for recommendation it is now well understood that CRE is included as a part of Reliability Programme evaluation and reviews.
Current AMC text
(h) Changes to configuration, role or operating environment.
Proposed new AMC text
Delete the last sub paragraph in toto.

NPA 2020-016

**PROPOSED DELETION OF GM DASR M SUBPART B –
ACCOUNTABILITY TEXT**

GM M.A.201(a)(2) Responsibilities (AUS)
Rationale
The associated regulation clause is a clear statement "any operational and emergency equipment fitted is correctly installed and serviceable or clearly identified as unserviceable". The GM does not provide any extra clarity and shall be deleted.
Current GM text
'Operational and emergency equipment' is also referred to as role equipment. Role equipment requirements are detailed in DASR ORO.75(a).
Proposed new GM text
Delete GM M.A.201(a)(2) Responsibilities (AUS) in toto.

GM M.A.201(g) - Alternate artefact
Rationale
GM is a single sentence that refers back to the AMC in regards to alternate artefact. As alternate artefact is just referenced in the AMC and not else where in M.A.201(g) the GM shall be deleted.
Current GM text
Alternate artefact (see AMC paragraph c) will only be applicable for organisations outside AUS.
Proposed new GM text
Delete GM M.A.201(g) - Alternate artefact in toto.

GM M.A.201(k) Responsibilities (AUS)
Rationale
The GM does not provide any additional clarity and shall be deleted.
Current GM text
This clause only covers the contracting out of the whole CAMO function for an aircraft type(s) listed on the Operating Organisation's MAOC. If this derogation clause is utilised, that contracted CAMO is still able to subcontract tasks in accordance with DASR M.A.201(h)(1).
Proposed new GM text
Delete GM M.A.201(k) Responsibilities (AUS) in toto.

NPA 2020-016

**PROPOSED DELETION OF GM DASR M SUBPART C –
CONTINUING AIRWORTHINESS TEXT**

GM M.A.301(b)(2) Continuing airworthiness tasks (AUS)
Rationale
The regulation clause is a clear statement and the GM only states what the type design is. As type design is well documented the GM adds no value and shall be deleted.
Current GM text
'The type design approved by the NMAA' is the configuration of the type design at the award of a Military Type Certificate and any changes or repairs approved under M.A.304.
Proposed new GM text
Delete GM M.A.301(b)(2) Continuing airworthiness tasks (AUS) in toto.

GM M.A.302(b) Aircraft Maintenance Program (AMP) (AUS)
Rationale
The GM does not provide guidance about producing or amending an AMP. It simply references M.A.704 and M.A. 708 and the last sentence is also in M.A.708(b)(2)(ii). As the information is covered in M.A.708 the GM shall be deleted.
Current GM text
The AMP and its amendments are required be approved by the NMAA, unless covered by an indirect approval procedure at DASR M.A.708(b)(2)(ii). Consistent with DASR M.A.704(c), the indirect approval procedure shall define the eligible amendments, ie scope of changes, to the AMP, be established by the CAMO as part of the CAME and be approved by the NMAA.
Proposed new GM text
Delete GM M.A.302(b) Aircraft Maintenance Program (AMP) (AUS) in toto.

GM M.A.302(f) Aircraft Maintenance Program
Rationale
<p>Based on EASA AMC M.A.302(g) paragraph 1 and includes additional term reliability centred maintenance (RCM). EMAR has paragraph 1 as not applicable. Paragraph 1 green text shall be changed to black text NOT APPLICABLE to align with EMAR as RCM information is to be included in a separate Advisory Circular.</p> <p>Paragraph 7 derived from EASA AMC M.B.301(d) Maintenance programme and included as an added paragraph (7) to DASR MAC 302(f). RAMP review recommended deleting green text paragraph as content is to be included in the Advisory Circular.</p>
Current GM text
<ol style="list-style-type: none"> 1. Reliability programmes should be developed for aircraft maintenance programmes based upon maintenance steering group (MSG)/reliability centred maintenance (RCM) logic or those that include condition monitored components or that do not contain overhaul time periods for all significant system components. 2. NOT APPLICABLE. 3. The purpose of a reliability programme is to ensure that the AMP tasks are effective and their periodicity is adequate. 4. The reliability programme may result in the extension or reduction of a maintenance task interval, as well as the deletion or addition of a maintenance task. 5. A reliability programme provides an appropriate means of monitoring the effectiveness of the AMP. 6. Appendix I to AMC M.A.302 provides further guidance. 7. Programmes and all associated airworthiness data, including that data used for substantiating the escalation of programmes should be made available to the NMAA upon request.
Proposed new GM text
<ol style="list-style-type: none"> 1. NOT APPLICABLE 2. NOT APPLICABLE. 3. The purpose of a reliability programme is to ensure that the AMP tasks are effective and their periodicity is adequate. 4. The reliability programme may result in the extension or reduction of a maintenance task interval, as well as the deletion or addition of a maintenance task. 5. A reliability programme provides an appropriate means of monitoring the effectiveness of the AMP. 6. Appendix I to AMC M.A.302 provides further guidance.

GM M.A.305(a) Aircraft continuing airworthiness record system (AUS)
Rationale
This is not guidance it just provides CAMM 2 as an example of an aircraft continuing airworthiness record system used by the ADF. The GM shall be deleted.
Current GM text
An example of an aircraft continuing airworthiness record system utilised in the Australian Defence Force is Computer Aided Maintenance Management System 2 (CAMM2).
Proposed new GM text
Delete GM M.A.305(a) Aircraft continuing airworthiness record system (AUS) in toto.

GM M.A.305(d)(5) Aircraft continuing airworthiness record system (AUS)
Rationale
The term 'Weight and Balance Report' is clear in that it refers to weight and balance therefore the GM shall be deleted.
Current GM text
The 'Weight and Balance Report' is to be interpreted as the 'Weight and Balance Statement' to ensure consistent terminology across DASR M.
Proposed new GM text
Delete GM M.A.305(d)(5) Aircraft continuing airworthiness record system (AUS) in toto.

GM M.A.307 (b) Transfer of aircraft continuing airworthiness records (AUS)
Rationale
The regulation clause is a clear statement and the GM does not appear to provide any additional clarity. The GM shall be deleted.
Current GM text
This regulation is applicable when the derogation clause in DASR M.A.201(k) is being enacted.
Proposed new GM text
Delete GM M.A.307 (b) Transfer of aircraft continuing airworthiness records (AUS) in toto.

NPA 2020-016

**PROPOSED DELETION OF GM DASR M SUBPART G –
CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION
(CAMO) TEXT**

GM M.A.702(b)(3) Application (AUS)
Rationale
The regulation clause is a simple clear statement and handling of electronic documents is well known and a basic business process. Therefore the GM does not add any value and shall be deleted.
Current GM text
The aircraft technical log may not be a physical document, rather it may be an electronic system. In this case, submitting the technical log may simply involve a description of the system, functionality and relevant user interface screen shots.
Proposed new GM text
Delete GM M.A.702(b)(3) Application (AUS) in toto.

GM M.A.703(a) Extent of approval (AUS)
Rationale
The regulation is a clear statement on where approval is indicated. The GM does not appear relevant or add any value and shall be deleted.
Current GM text
The approval would typically be granted concurrent with issue of the Military Air Operator Certificate (MAOC) issued by the NMAA, for the aircraft operated.
Proposed new GM text
Delete GM M.A.703(a) Extent of approval (AUS) in toto.

GM M.A.704(a)(3) and GM M.A.704(a)(5) Continuing Airworthiness Management Exposition (AUS)
Rationale
The regulation clause about the information that should be included in the CAME such as “the title(s) and name(s) of person(s) referred to in DASR M.A.706(a), M.A.706(c), M.A.706(d) and M.A.706(i);” is a clear and simple statement. The GM does not appear to provide any additional clarity and shall be deleted.
Current GM text
The names of personnel satisfying this regulation can be located in a database or document separate to the CAME providing the database or document is referenced in the CAME and the NMAA is notified of any changes to the person(s) in these positions.
Proposed new GM text
Delete GM M.A.704(a)(3) and GM M.A.704(a)(5) Continuing Airworthiness Management Exposition (AUS) in toto

GM M.A.704(a)(10) Continuing Airworthiness Management Exposition (AUS)
Rationale
The regulation clause about the information that should be included in the CAME such as “a list of all contractors/tasked organisations (where applicable)” is a clear and simple statement. The GM does not appear to provide any additional clarity and shall be deleted.
Current GM text
This includes organisations contracted/tasked to carry out continuing airworthiness management tasks in accordance with DASR M.A.711(a)3.
Proposed new GM text
Delete GM M.A.704(a)(10) Continuing Airworthiness Management Exposition (AUS) in toto.

GM M.A.704(a)(11) Continuing Airworthiness Management Exposition (AUS)
Rationale
The regulation sub clause is a clear statement “the names of all Operating Organisations to which CAMO support activities are provided (if applicable).” The GM does not provide any guidance to the sub clause and shall be deleted.
Current GM text
This regulation is only applicable if DASR M.A.201(k) is enacted or if a CAMO provides continuing airworthiness management services to another Operating Organisation.
Proposed new GM text
Delete GM M.A.704(a)(11) Continuing Airworthiness Management Exposition (AUS) in toto.

GM M.A.706(i) Personnel requirements (AUS)
Rationale
The associated clause is clear statement and the GM does not add any clarity as it simply references M.A.707(b) and shall be deleted.
Current GM text
NOTE: requirements detailed in DASR M.A.707(b) for MARC staff.
Proposed new GM text
Delete GM M.A.706(i) Personnel requirements (AUS) in toto.

GM M.A.707(a)(1)(iv) Airworthiness review staff (AUS)
Rationale
The associated clause is related to what airworthiness review staff shall have acquired to perform the review. The GM is simply stating they can have another role in the CAMO and does not provide any clarity to the regulation clause and shall be deleted.
Current GM text
The airworthiness review staff can be 'dual hatted' with other continuing airworthiness management responsibilities within the CAMO.
Proposed new GM text
Delete GM M.A.707(a)(1)(iv) Airworthiness review staff (AUS) in toto.

GM M.A.708(b) Continuing airworthiness management (AUS)
Rationale
The regulation clause lists the things a CAMO is required to do to manage their aircraft. The GM text is not relevant to the regulation clause and shall be deleted.
Current GM text
NOTE: Appendix II to AMC M.A.201(h)1 contains details on subcontracting/tasking continuing airworthiness management tasks.
Proposed new GM text
Delete GM M.A.708(b) Continuing airworthiness management (AUS) in toto.

GM M.A.708(b)(6) Continuing airworthiness management (AUS)
Rationale
The text has been in DASR since 31 Jan 17. It was retained in the Sep 17 release and it was noted that the GM should be deleted "Delete at Future Release after consultation with recognition team" The GM is no longer applicable and shall be deleted.
Current GM text
In the context of this regulation, a DASR 145 AMO also includes one assessed to be equivalent at DASR M.A.201(g).
Proposed new GM text
Delete GM M.A.708(b)(6) Continuing airworthiness management (AUS) in toto.

GM M.A.708(b)(7) Continuing airworthiness management (AUS)
Rationale
The text has been in DASR since 31 Jan 17. It was retained in the Sep 17 release and it was noted that the GM should be deleted "Delete at Future Release after consultation with recognition team" The GM is no longer applicable and shall be deleted.
Current GM text
In the context of this regulation, a DASR 145 AMO also includes one assessed to be equivalent at DASR M.A.201(g).
Proposed new GM text
Delete GM M.A.708(b)(7) Continuing airworthiness management (AUS) in toto.

GM M.A.708(b)(8) Continuing airworthiness management (AUS)
Rationale
The regulation clause is a clear statement and the GM does not add any value as it is just stating that at the end of the approved service life the component must be removed for maintenance or disposal. The GM shall be deleted.
Current GM text
REPLACEMENT OF SERVICE LIFE LIMITED PARTS
At the end of the approved service life, the component must be removed from the aircraft for maintenance, or for disposal in the case of components with a certified life limit. The exception is if the service life has been extended or a repair solution has been approved according to DASR M.A.304—Data for modifications and repairs
Proposed new GM text
Delete GM M.A.708(b)(8) Continuing airworthiness management (AUS) in toto.

GM M.A.709(a) Documentation (AUS)
Rationale
The regulation clause is a clear statement that the CAMO only needs access to the data for the duration of the contract. The GM does not provide any relevant guidance and shall be deleted.
Current GM text
The last sentence of DASR M.A.709(a) caters for the scenario where a CAMO is contracted/tasked by an Operating Organisation (see DASR M.A.201(k)). When the contract/tasking expires, the CAMO no longer needs to retain the data, subject to the requirements of DASR M.A.714—Record keeping.
Proposed new GM text
Delete GM M.A.709(a) Documentation (AUS) in toto.

GM M.A.710(c)(4) Airworthiness review (AUS)
Rationale
The regulation clause is clear statement and the GM does not add provide any additional clarity and shall be deleted.
Current GM text
The statement 'reasonably expected to be addressed' means the defect was adequately managed under DASR M.A.708(b)6. It is important to note that the 'physical survey' is a survey and is not a detailed maintenance inspection of the aircraft.
Proposed new GM text
Delete GM M.A.710(c)(4) Airworthiness review (AUS) in toto.

GM M.A.715(a)(1) Continued validity of approval (AUS)
Rationale
The GM text is more applicable to DASA as it describes the actions to be taken by DASA as the NMAA. It is not in EMAR, EASA or CASA and shall be deleted without impacting the regulation.
Current GM text
<p>1. When during audits or by other means, evidence is found showing non-compliance to the DASR M requirements, the NMAA shall take the following actions:</p> <p>a. For level 1 findings, immediate action shall be taken by the NMAA to revoke, limit or suspend in whole or in part, depending upon the extent of the level 1 finding, the CAMO approval, until successful corrective action has been taken by the CAMO.</p> <p>b. For level 2 findings, the corrective action period granted by the NMAA must be appropriate to the nature of the finding but in any case initially must not be more than three months. In certain circumstances and subject to the nature of the finding the NMAA may extend the three month period subject to a satisfactory corrective action plan agreed by the NMAA.</p> <p>c. Observations will not require immediate action by the holder of the CAMO approval. If appropriate, the NMAA will specify a compliance time.</p> <p>2. Action shall be taken by the NMAA to suspend, in whole or part, the approval in case of failure to comply within the timescale granted by the NMAA.</p>
Proposed new GM text
Delete GM M.A.715(a)(1) Continued validity of approval (AUS) in toto.

GM M.A.716(d) CAMO findings by the NMAA (AUS)
Rationale
The text states that the NMAA in addition to making findings may also make observations this is more applicable to DASA. Observations may simply be suggestions for improvements and the GM does not appear to be relevant to regulation and shall be deleted.
Current GM text
Further to the findings listed in DASR M.A.716(b) and DASR M.A.716(c), the NMAA may make observations where it has been identified, by objective evidence, to contain potential problems that could lower the safety standard and possibly hazards the flight safety. Observations do not require corrective action however if left unaddressed may result in subsequent findings by the NMAA.
Proposed new GM text
Delete GM M.A.716(d) CAMO findings by the NMAA (AUS) in toto.

NPA 2020-016

PROPOSED DELETION OF GM DASR M SUBPART I – MILITARY AIRWORTHINESS REVIEW CERTIFICATE (MARC) TEXT

GM M.A.901 Aircraft airworthiness review (AUS)
Rationale
The first sentence is basically the same as regulation clause and the second sentence should no longer be necessary as this information is included in the airworthiness review. The GM shall be deleted.
Current GM text
In order to ensure the validity of the aircraft airworthiness certificate, DASR M.A.901 requires performing periodically an airworthiness review of the aircraft and its continuing airworthiness records, which results in the issuance of a Military Airworthiness Review Certificate (MARC) valid for one year. Note the airworthiness review is a survey of individual aircraft tails and not an audit of the CAMO or CAMO processes. Issues associated with the CAMO or CAMO processes may be identified during the conduct of an aircraft airworthiness review, these issues should be raised and corrected through the quality system, not through the airworthiness review process.
Proposed new GM text
Delete GM M.A.901 Aircraft airworthiness review (AUS) in toto.

GM2 M.A.905(a) Findings from an aircraft airworthiness review carried out by the NMAA (AUS)
Rationale
GM2 is related to NMAA actions and is not relevant to the regulated community. It is based on EASA M.B.903 which is currently not applicable to DASR. The GM2 shall be deleted.
Current GM text
If during aircraft surveys or by other means evidence is found showing non-compliance to a DASR M requirement, the NMAA shall take the following actions: a. for level 1 findings, the NMAA shall require appropriate corrective action to be taken before further flight and immediate action shall be taken by the NMAA to revoke or suspend the airworthiness review certificate. b. for level 2 findings, the corrective action required by the NMAA shall be appropriate to the nature of the finding.
Proposed new GM text
Delete GM2 M.A.905(a) Findings from an aircraft airworthiness review carried out by the NMAA (AUS) in toto.

GM M.A.905(a)(2) Findings from an aircraft airworthiness review carried out by the NMAA (AUS)

Rationale

The GM provides information on root cause analysis. Although useful, root cause analysis is an established process and does not require detailed information in DASR. Therefore the green text shall be deleted.

Current GM text

ROOT CAUSE ANALYSIS

1. It is important that the analysis does not primarily focus on establishing who or what caused the non-compliance but why it was caused. Establishing the root cause or causes of a non-compliance often requires an overarching view of the events and circumstances that lead to it, to identify all possible systemic and contributing factors (regulatory, human factors, organisational, managerial, cultural, technical, etc.) in addition to the direct factors. A narrow focus on single events or failures, or the use of a simple, linear model, such as fault tree, to identify the chain of events that lead to the non-compliance may not properly reflect the complexity of the issue, and, therefore, bears the risk that important factors required to be addressed in order to prevent reoccurrence will be ignored.

2. Such inappropriate or partial root cause analysis often leads to defining 'quick fixes' addressing the symptoms of the nonconformity only. A peer review of the results of the root cause analysis may increase its reliability and objectivity.

3. A system description of the organisation considering organisational structures, processes and their interfaces, procedures, staff, equipment, facilities, and the environment in which the organisation operates will support both effective root cause (reactive) and hazard (proactive) analysis.

Proposed new GM text

Delete GM M.A.905(a)(2) Findings from an aircraft airworthiness review carried out by the NMAA (AUS) in toto.

NPA 2020-016 Response Sheet

DASR PART M PROPOSED AMENDMENTS AND DELETIONS AS IDENTIFIED BY DASR GREEN TEXT REVIEW

Please forward this sheet to DASA as an email attachment to [DASA](#) by 26 Mar 21.

Please indicate your acceptance or otherwise of this proposal by ticking the appropriate box below. Additional comments, suggested amendments or alternative action are welcome and may be provided on this response sheet or by separate correspondence.

- The proposal is **acceptable without change.**
- The proposal is **acceptable but would be improved if the following changes were made:**
- The proposal is **not acceptable but would be acceptable if the following changes were made:**

LSN	NPA Reference: (i.e Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation
1			
2			
3			
4			
5			

RESOURCE IMPLICATIONS

Please provide specific comment on any significant resource implications that this proposal may have for your organisation, for both its implementation and ongoing compliance. Your comments should address both financial and human resource considerations.

Resource implications – Proposal implementation	
Resource implications – Proposal sustainment	

RESPONDENT DETAILS

Your name:	
Submission date:	
Your organisation:	
Email address:	
Postal address:	
Phone:	
Whose views are represented in your response? i.e. Is your response the authoritative response from your organisation?	Responding on behalf of : Individual [] Regulated Military entity [] Regulated Commercial entity [] Wing HQ [] Group HQ [] ADF Regulatory, Technical or Logistics policy agency [] Other commercial entity [], Other [] Please describe:
Do you consent to your name being published as an NPA respondent within the NPA Summary of Responses:	YES [] NO []