



NOTICE OF PROPOSED DASR AMENDMENT

NPA 2020-023

DASR PART 145 PROPOSED AMENDMENTS AND DELETIONS AS IDENTIFIED BY DASR GREEN TEXT REVIEW

INTRODUCTION

Applicability

1. This proposal is applicable to all users of DASR 145 Requirements for Maintenance Organisations.

Purpose

2. The purpose of this NPA is to support the intent to amend and/or delete DASR 145 Regulatory, Acceptable Means of Compliance (AMC) and Guidance Material (GM) green text that does not provide any additional clarity or guidance to the associated regulation.

3. The proposed amendments and/or deletions simplify, remove superfluous text, improve clarity and guidance to the regulation in the following DASR 145 Sections:

- a. 145.A.20 Terms of approval
- b. 145.A.25 Facility requirements
- c. 145.A.30 Personnel requirements
- d. 145.A.35 Certifying staff and support staff
- e. 145.A.40 Equipment, tools and material
- f. 145.A.42 Acceptance of components
- g. 145.A.48 Performance of maintenance
- h. 145.A.55 Maintenance records
- i. 145.A.65 Safety and quality policy, maintenance procedures, quality system and safety management system
- j. 145.A.70 Maintenance Organisation Exposition (MOE)
- k. 145.A.85 Changes to the AMO
- l. 145.A.90 Continued validity of approval
- m. 145.A.95 AMO Findings by the NMAA

4. The benefits flowing from the proposal are expected to:

- a. Simplify DASR 145 by either amending or removing green text to improve readability.
- b. Improve alignment of DASR 145 to EMAR 145.

Background

5. At the time of the initial DASR release, DASR 145 contained additional green text, to assist the Defence aviation community in the transitioning from the Technical Airworthiness Regulation regulatory suite to DASR. Since DASR was introduced in Sep 2016, the understanding of regulatory principles has significantly matured.

6. The proposed changes to regulatory, AMC and GM text within this NPA removes text that either repeats the regulatory text, does not provide any additional clarity or is deemed no longer relevant. The proposed changes are expected to simplify and clarify DASR and provide closer alignment to EMAR.

Proposed Amendment / Deletions

7. The proposed amendments and/or deletions are presented at Annexes A through D. Inclusion of text direct from EMAR has been proposed in a number of instances.

Implementation Strategy

8. The proposed amendments and/or deletions are intended to be released by DASA as soon as practicable. This amendment of DASR 145 does not change the intent of the primary regulation or the compliance requirements.

HOW TO SUBMIT COMMENTS ON THIS NPA

Format

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

Timing

10. Comments on NPA 2020-023 are to be forwarded to DASA by close of business on 26 Feb 21.

Additional Information

11. Additional information concerning this NPA is available from Mr Stephen Smith: stephen.smith8@defence.gov.au or (03) 9622 7436.

DISPOSITION OF RESPONSES RECEIVED

12. 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
Tel: (03) 9282 3465

29 Jan 21

Annexes:

- A. NPA 2020-023 – Proposed Amendment of DASR 145 Regulatory Text
- B. NPA 2020-023 – Proposed Amendment of DASR 145 AMC Green Text
- C. NPA 2020-023 – Proposed Deletion of DASR 145 AMC Green Text
- D. NPA 2020-023 – Proposed Deletion of DASR 145 GM Green Text
- E. NPA 2020-023 – Response Sheet

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PROPOSED AMENDMENT DASR 145 REGULATION TEXT

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| 145.A.35(i) |
| Rationale |
| EMAR Edition 1.2 changed the first part of the sentence to remove reference to the quality system to allow the case where it is not necessarily the QA department of the AMO that issues the authorisation but another specific part of the AMO that carries out this function. Change text to align with current EMAR Edition 1.2." |
| Current Regulation text |
| The person responsible for the quality system shall also remain responsible on behalf of the maintenance organisation for issuing certification authorisations to certifying staff. Such person may nominate other persons to actually issue or revoke the certification authorisations in accordance with a procedure as specified in the MOE. |
| Proposed new Regulation text |
| The maintenance organisation shall nominate an individual who shall remain responsible on behalf of the maintenance organisation for issuing certification authorisations to certifying staff. Such person may nominate other persons to actually issue or revoke the certification authorisations in accordance with a procedure as specified in the MOE. |

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| 145.A.48(b) |
| Rationale |
| Current green text regulation and associated green text AMC confuses between preventative and post error capturing methods. Insertion of EMAR black text regulation in lieu of current green text is considered appropriate in the context of providing clarity between the regulation and the AMC. |
| Current Regulation text |
| An error capturing method is implemented after the performance of any critical maintenance task. |
| Proposed new Regulation text |
| An independent inspection shall be carried out after any flight safety sensitive maintenance task unless otherwise specified in this DASR or agreed by the NMAA. |

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PROPOSED AMENDMENT DASR 145 AMC GREEN TEXT

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| AMC 145.A.30(b)(2) Personnel requirements (AUS) |
| Rationale |
| The AMC is just a link to the DASR Form 4. To simply DASR delete AMC and insert link to the DASR Form 4 in the regulation text. |
| Current AMC text |
| Personnel nominations should be submitted on a DASR Form 4. |
| Proposed new AMC text |
| Delete AMC 145.A.30(b)(2) Personnel requirements (AUS) in toto. Insert link in 145.A.30(b)(2) regulatory text to DASR Form 4 “The person or persons nominated shall be identified and their credentials submitted in a form and manner established by the NMAA.” |

AMC 145.A.40(a)(1) Equipment, tools and material (AUS)

Rationale

The AMC was incorporated in an amendment to the DASR draft release and clarifies the intent of what an alternate tool is and what is required to approve the use of alternate tools.

Text should be retained and relocated to GM as it is not AMC

Current AMC text (Note proposed to move AMC text to new GM)

The agreement by the NMAA for the use of alternative tooling by the Approved Maintenance Organisation should be formalised through the approval of a detailed procedure in the Maintenance Organisation Exposition. This AMC contains principles and conditions to be taken into account for the preparation of an acceptable procedure. The procedure should include:

- Demonstration of equivalence between design/manufacturing data of alternate tools and the data/features of the tools recommended in the maintenance data of the manufacturers.
- In-house identification rules for alternate tools (manufacturers reference number and serial number).
- Alternate tools validation process.
- Register of alternate tools / tagging / relation between the references of original tools and alternate tools.
- Treatment of possible changes of maintenance data according to the new references of alternative tooling (modifications limited to the references of the tooling to be used and/or adaptation of maintenance data regarding alternative tooling). Refer to DASR AMC 145.A.45(d) paragraph 1(c).
 - Use/storage/maintenance manuals according to the need.
 - In-house approval of each alternate tooling before servicing.
 - Storage of the records of alternative tooling.

Proposed new GM text (Note AMC text moved to GM)

The agreement by the NMAA for the use of alternative tooling by the Approved Maintenance Organisation should be formalised through the approval of a detailed procedure in the Maintenance Organisation Exposition. This GM contains principles and conditions to be taken into account for the preparation of an acceptable procedure. The procedure should include:

- Demonstration of equivalence between design/manufacturing data of alternate tools and the data/features of the tools recommended in the maintenance data of the manufacturers.
- In-house identification rules for alternate tools (manufacturers reference number and serial number).
- Alternate tools validation process.
- Register of alternate tools / tagging / relation between the references of original tools and alternate tools.
- Treatment of possible changes of maintenance data according to the new references of alternative tooling (modifications limited to the references of the tooling to be used and/or adaptation of maintenance data regarding alternative tooling). Refer to DASR AMC 145.A.45(d) paragraph 1(c).
 - Use/storage/maintenance manuals according to the need.
 - In-house approval of each alternate tooling before servicing.
 - Storage of the records of alternative tooling.

AMC 145.A.42(a)(2) Acceptance of components

Rationale

DASR Part M Sub part E refers to DASR 145 to cover off on EASA M.A.605 requirements. The last 3 paragraphs of the current AMC are covered in 145.A.25, 145.A.42 and 145.A.60 and can be deleted. Adding EASA AMC M.A.605(c) paragraph 7 provides the required additional information for unserviceable components.

Current AMC text

The maintenance organisation performing maintenance should ensure proper identification of any unserviceable components.

The unserviceable status of the component should be clearly declared on a tag or other suitable means together with the component identification data and any information useful to define actions necessary to be taken. Such information should state, as applicable, in-service times, maintenance status, preservation status, failures, defects or malfunctions reported or detected, exposure to adverse environmental conditions or if the component has been involved in or affected by an accident/incident. Means should be provided to prevent unwanted separation of this tag from the component.

Procedures shall be defined by the organisation describing the decision process for the status of unserviceable components. This procedure shall identify at least the following:

- a. role and responsibilities of the persons managing the decision process;
- b. description of the decision process to choose between maintaining, storing or mutilating a component;
- c. traceability of decision.

Storage / segregation and management of any unserviceable component shall be ensured according to the pertinent procedure approved to that organisation.

Where the unserviceability has resulted in an occurrence report, the component shall be retained by the maintenance organisation until such time as investigation into the failure, malfunction or defect has determined that the component is not required to be retained for further examination.

NOTE: 'A secure location under the control of an approved maintenance organisation' means a secure location for which security is the responsibility of the approved maintenance organisation. This may include facilities established by the approved maintenance organisation at locations different from the main maintenance facilities. These locations should be identified in the relevant procedures of the approved maintenance organisation.

Proposed new AMC text

The maintenance organisation performing maintenance should ensure proper identification of any unserviceable components.

The unserviceable status of the component should be clearly declared on a tag or other suitable means together with the component identification data and any information useful to define actions necessary to be taken. Such information should state, as applicable, in-service times, maintenance status, preservation status, failures, defects or malfunctions reported or detected, exposure to adverse environmental conditions or if the component has been involved in or affected by an accident/incident. Means should be provided to prevent unwanted separation of this tag from the component.

Procedures shall be defined by the organisation describing the decision process for the status of unserviceable components. This procedure shall identify at least the following:

- a. role and responsibilities of the persons managing the decision process;

- b. description of the decision process to choose between maintaining, storing or mutilating a component;
- c. traceability of decision.

Once unserviceable components or materials have been identified as unsalvageable, the organisation should establish secure areas in which to segregate such items and to prevent unauthorised access. Unsalvageable components should be managed through a procedure to ensure that these components receive the appropriate final disposal. The person responsible for the implementation of this procedure should be identified.

AMC 145.A.48(b) Performance of maintenance (first paragraph green text)

Rationale

Current green text regulation and associated green text AMC confuses between preventative and post error capturing methods.

Removal of reference to 302(d)(3) is considered pertinent noting that this regulation is about preventative error capture not post error recording. Further removal of green text prior to 302(d)(3) reference is also required to aid in clarity of the regulation and AMC intent.

Current AMC text (first paragraph green text)

Independent inspection is one possible error-capturing method following the performance of any critical maintenance. See DASR AMC M.A.302(d)(3)

Proposed new AMC text

Delete first paragraph green text in toto.

AMC 145.A.70(a) Maintenance Organisation Exposition (paragraph 3.16)

Rationale

Text to be changed to "3.16 Procedure for the issue of a recommendation to the NMAA for the issue of a DASR 66 licence."

AMC 145.A.70(a) MOE and Appendix V to DASR AMC 145.A.70(a) to have the same changes to maintain alignment.

Current AMC text

3.16 Procedure for the issue of a recommendation to the NMAA for the issue of a DASR 66 licence in accordance with [DASA Instructions \(to be issued\)](#).

Proposed new AMC text

3.16 Procedure for the issue of a recommendation to the NMAA for the issue of a DASR 66 licence.

**Appendix V to DASR AMC 145.A.70 - Maintenance Organisation Exposition - PART 3
QUALITY SYSTEM PROCEDURES (Paragraph 3.16)**

Rationale

Text to be changed to "3.16 Procedure for the issue of a recommendation to the NMAA for the issue of a DASR 66 licence."

AMC 145.A.70(a) MOE and Appendix V to DASR AMC 145.A.70(a) to have the same changes to maintain alignment.

Current Appendix V to DASR AMC 145.A.70 text

3.16 Procedure for the issue of a recommendation to the NMAA for the issue of a DASR 66 licence in accordance with [DASA Instructions \(to be issued\)](#).

Proposed new Appendix V to DASR AMC 145.A.70 text

3.16 Procedure for the issue of a recommendation to the NMAA for the issue of a DASR 66 licence.

AMC 145.A.85(a) - Changes to the AMO (AUS)

Rationale

The AMC simply provides a link to AMC 145.A.15 Application. It is proposed to delete the AMC and provide the link in the regulation text "notify".

Current AMC text

[An application for change to the AMO, for those listed in DASR 145.A.85\(a\), shall be made in a form and manner established by the MAA, see AMC 145.A.15.](#)

Proposed new AMC text

Delete AMC 145.A.85(a) - Changes to the AMO (AUS) in toto and insert the link to AMC 145.A.15 Application in the 145.A.85 directly in the regulation text "notify".

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PROPOSED DELETION OF DASR 145 AMC GREEN TEXT

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| AMC 145.A.20 Terms of approval (AUS) |
| Rationale |
| <p>The first paragraph is redundant as it just repeats text to the actual regulation clause. "(Appendix II to this DASR contains a table of all classes and ratings)".</p> <p>Paragraph 3 green text is similar to EASA and EMAR AMC 145.A .10 Scope. EASA AMC defines Line and Base maintenance (sub paras (a) and (b)) whereas EMAR refers to EMAD 1. In the case of DASR the green text shall be deleted as it is conflicting information and AC 007/2018 Line and Base maintenance contains adequate information.</p> |
| Current AMC text |
| <p>1. Appendix II to DASR 145.A.20 details the Class and rating system to be used to determine the scope of approval for Maintenance Organisations.</p> <p>2. Table 1 in Appendix II of DASR 145 identifies the S1000D Chapter Reference for the Category C component rating. If the maintenance manual (or equivalent document) does not follow the S1000D Chapter reference, the corresponding subjects still apply to the applicable C rating.</p> <p>3. Line maintenance should be understood as any maintenance that is carried out before flight to ensure that the aircraft is fit for the intended flight.</p> <p>a. Line maintenance may include:</p> <ul style="list-style-type: none">- Trouble shooting.- Defect rectification.- Component replacement with use of external test equipment if required. Component replacement may include components such as engines and propellers.- Scheduled maintenance and/or checks including visual inspections that will detect obvious unsatisfactory conditions/discrepancies but do not require extensive in depth inspection. It may also include internal structure, systems and power plant items which are visible through quick opening access panels/doors.- Minor repairs and modifications which do not require extensive disassembly and can be accomplished by simple means. <p>b. For temporary or occasional cases (AD's, SB's) the Quality Manager may accept base maintenance tasks to be performed by a line maintenance organisation provided all requirements are fulfilled as defined by the NMAA.</p> <p>c. Maintenance tasks falling outside these criteria are considered to be base maintenance.</p> <p>d. Aircraft maintained in accordance with "progressive" type programmes should be individually assessed in relation to this paragraph. In principle, the decision to allow some "progressive" checks to be carried out should be determined by the assessment that all tasks within the</p> |

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| particular check can be carried out safely to the required standards at the designated line maintenance station. |
| Proposed new AMC text |
| Table 1 in Appendix II of DASR 145 identifies the S1000D Chapter Reference for the Category C component rating. If the maintenance manual (or equivalent document) does not follow the S1000D Chapter reference, the corresponding subjects still apply to the applicable C rating. |

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| AMC 145.A.25(d) Facility requirements |
| Rationale |
| <p>The green text at the start of the 2nd paragraph does not add any value or clarification to the regulation and should be deleted.</p> <p>The 4th paragraph repeats the intent of the regulation clause and shall be deleted.</p> |
| Current AMC text |
| <ol style="list-style-type: none"> 1. Storage facilities for serviceable aircraft components should be clean, well ventilated and maintained at a constant dry temperature to minimise the effects of condensation. Manufacturer's storage recommendations should be followed for those aircraft components identified in such published recommendations. With regards to deployed military operations these requirements should be met as far as practicable. 2. Adequate storage racks must be provided and should be strong enough to hold aircraft components and provide sufficient support for large aircraft components such that the component is not distorted during storage. 3. All aircraft components, wherever practicable, should remain packaged in protective material to minimise damage and corrosion during storage. 4. Once unserviceable components, or materials have been identified as unsalvageable in accordance with DASR 145.A.42(d), the organisation shall establish secure storage / segregation areas^{Show1} in which to store such items, and prevent unauthorised access. The person responsible for the implementation of this procedure must be identified. |
| Proposed new AMC text |
| <ol style="list-style-type: none"> 1. Storage facilities for serviceable aircraft components should be clean, well ventilated and maintained at a constant dry temperature to minimise the effects of condensation. Manufacturer's storage recommendations should be followed for those aircraft components identified in such published recommendations. With regards to deployed military operations these requirements should be met as far as practicable. 2. Storage racks should be strong enough to hold aircraft components and provide sufficient support for large aircraft components such that the component is not distorted during storage. 3. All aircraft components, wherever practicable, should remain packaged in protective material to minimise damage and corrosion during storage. |

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| AMC 145.A.35(n) Certifying staff and support staff |
| Rationale |
| The green text shall be deleted as it is repeating the information in the regulation text. |
| Current AMC text |
| <ol style="list-style-type: none"> 1. It is the responsibility of the AMO issuing the Category A certifying staff authorisation to ensure that the task training received by this person covers all the tasks to be authorised. This is particularly important in those cases where the task training has been provided by a DASR 147 MTO or by an AMO different from the one issuing the authorisation. 2. "Appropriately approved in accordance with DASR 147" means an MTO holding an approval to provide Category A task training for the corresponding aircraft type. 3. "Appropriately approved in accordance with DASR 145" means an AMO holding a maintenance organisation approval for the corresponding aircraft type. 4. It is acceptable to substitute task training with type training, provided that the type training meets the requirements of paragraph 1 |
| Proposed new AMC text |
| <ol style="list-style-type: none"> 1. It is the responsibility of the AMO issuing the Category A certifying staff authorisation to ensure that the task training received by this person covers all the tasks to be authorised. This is particularly important in those cases where the task training has been provided by a DASR 147 MTO or by an AMO different from the one issuing the authorisation. 2. "Appropriately approved in accordance with DASR 147" means an MTO holding an approval to provide Category A task training for the corresponding aircraft type. 3. "Appropriately approved in accordance with DASR 145" means an AMO holding a maintenance organisation approval for the corresponding aircraft type. |

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| AMC 145.A.35(o) Certifying and support staff paragraph 4 |
| Rationale |
| The green text shall be removed without affecting the intent of DASR as it is repeating the intent of the first sentence. |
| Current AMC text |
| <ol style="list-style-type: none"> 4. The term "6 months of experience" can include either full-time employment or part-time employment. The important aspect is that the person has been involved for the equivalent of a 6 month period in those tasks which are going to be part of the authorisation. |
| Proposed new AMC text |
| <ol style="list-style-type: none"> 4. The term "6 months of experience" can include either full-time employment or part-time employment. The important aspect is that the person has been involved in those tasks which are going to be part of the authorisation. |

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| AMC 145.A.42(a)(1) Acceptance of components (AUS) |
| Rationale |
| This AMC repeats the content of AMC 145.A.42(b) and there is an AC 008/2018 Acceptance of Aircraft Components, therefore the AMC shall be deleted. |
| Current AMC text |
| <ol style="list-style-type: none"> 1. To ensure a component is in a satisfactory condition, the approved maintenance organisation should ensure that authorised certifying staff perform checks and verifications. 2. Performance of above checks and verifications should take place before the component is installed on the aircraft. 3. The following list, though not exhaustive, contains typical checks and verifications to be performed: <ol style="list-style-type: none"> a. verify the general condition of components and their packaging in relation to damages that could affect the integrity of the components; b. verify that the shelf life of the component has not expired; c. verify that items are received in the appropriate package in respect of the type of component i.e. electrostatic sensitive devices are packed in electro sensitive packaging when necessary; d. verify that component has all plugs and caps appropriately installed to prevent damage or internal contamination. Tape should not be used to cover electrical connections or fluid fittings/openings because adhesive residues can insulate electrical connections and contaminate hydraulic or fuel units. 4. The purpose of the DASR Form 1 is to release components after manufacture and to release maintenance work carried out on such components under the approval of an NMAA and to allow components removed from one aircraft/component to be fitted to another aircraft/ component. |
| Proposed new AMC text |
| Delete AMC 145.A.42(a)(1) Acceptance of components (AUS) in toto. |

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| AMC2 145.A.42(a)(4) Acceptance of components (AUS) |
| Rationale |
| AMC2 duplicates paragraphs (a) and (b) in AMC1 and information in regards to standard parts is in AC 008/2018 Acceptance of Aircraft Components. Therefore AMC2 shall be deleted. |
| Current AMC text |
| <p>1. Standard parts are:</p> <p>a. Parts manufactured in complete compliance with an established industry, agency, NMAA or other Government specification which includes design, manufacturing, test and acceptance criteria, and uniform identification requirements. The specification should include all information necessary to produce and verify conformity of the part. It should be published so that any party may manufacture the part. Examples of specifications are National Aerospace Standards (NAS), Army-Navy Aeronautical Standard (AN), Society of Automotive Engineers (SAE), SAE Sematec, Joint Electron Device Engineering Council, Joint Electron Tube Engineering Council, and American National Standards Institute (ANSI), EN Specifications etc...</p> <p>b. Not Applicable</p> <p>2. To designate a part as a standard part the Type Certificate (TC) holder may issue a standard parts manual accepted by the NMAA of the original TC holder or may make reference in the parts catalogue to a national/international specification (such as a standard diode/capacitor etc) not being an aviation only specification for the particular part.</p> <p>3. Documentation accompanying standard parts should clearly relate to the particular parts and contain a conformity statement plus both the manufacturing and supplier source. Some material is subject to special conditions such as storage condition or life limitation etc. and this should be included on the documentation and / or material packaging.</p> <p>4. A DASR Form 1, or equivalent is not normally issued and therefore none should be expected.</p> |
| Proposed new AMC text |
| Delete AMC2 145.A.42(a)(4) Acceptance of components (AUS) in toto. |

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| AMC 145.A.42(b) Acceptance of components (paragraph (d)(ii)) hyper-linked Note 1) |
| Rationale |
| The hyper-linked note is not applicable to the regulation clause as it is a prescriptive statement that a shelf life system must be used and identity tags used on components. The intent of the regulation clause is clear in that the shelf life has not expired. Therefore the hyper-linked note does not add any value and shall be deleted. |
| Current AMC text (Note 1) |
| A shelf life control system must be utilised, and identity tags used to identify components. |
| Proposed new AMC text |
| Delete AMC 145.A.42(b) Acceptance of components (paragraph (d)(ii)) hyper-linked Note 1) in toto. |

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| AMC 145.A.48(a) Performance of maintenance (AUS) |
| Rationale |
| The green text is generic in nature and basically has the same intent as the regulation therefore it shall be deleted. |
| Current AMC text |
| <p>1. The general maintenance and inspection standards applied to individual maintenance tasks should meet the recommended standards and practices of the organisation responsible for the type design which are normally published in the maintenance manuals.</p> <p>2. In the absence of maintenance and inspection standards published by the organisation responsible for the type design maintenance personnel should refer to the relevant aircraft airworthiness standards and procedures published or used as guidance by the NMAA. The maintenance standards used should contain methods, techniques and practices acceptable to the NMAA for the maintenance of aircraft and its components.</p> |
| Proposed new AMC text |
| Delete AMC 145.A.48(a) Performance of maintenance (AUS) in toto. |

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| AMC 145.A.65(b)(4) Safety and quality policy, maintenance procedures, quality system and safety management system (AUS) |
| Rationale |
| The regulation clause is clear in that damage is to be assessed and modifications and repairs are carried out using data specified in DASR M.A.304. If damage is beyond limits then either the aircraft or component will be unserviceable. Any repairs not covered by approved data will require further investigation and approval before repairs can be carried out. As AMC just restates the regulation clause the AMC shall be deleted |
| Current AMC text |
| Procedures should be established to ensure that all damage to aircraft or components is assessed against published approved repair data and the action to be taken if the damage is beyond the limits or outside the scope of such data. This could involve any one or more of the following options; repair by replacement of damaged parts, requesting technical support from the CAMO, the type certificate holder, from an organisation approved in accordance with DASR 21 and finally agency approval of the particular repair data. |
| Proposed new AMC text |
| Delete AMC 145.A.65(b)(4) Safety and quality policy, maintenance procedures, quality system and safety management system (AUS) in toto. |

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| AMC 145.A.95(a) AMO Findings by the NMAA (AUS) |
| Rationale |
| The AMC is not relevant to the regulation clause and shall be deleted. |
| Current AMC text |
| The corrective action plan defined by the organisation should address the effects of the non-compliance, as well as its root cause(s) and contributing factors. |
| Proposed new AMC text |
| Delete AMC 145.A.95(a) AMO Findings by the NMAA (AUS) in toto. |

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PROPOSED DELETION OF DASR 145 GM GREEN TEXT

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| GM 145.A.55(c)(2) Maintenance records (AUS) |
| Rationale |
| The regulation clause relates to the storage of backups and that they remain in good condition. The GM is about when hardware or software changes that all data continues to be accessible, this is unrelated to the clause. As the GM is unrelated to the regulation clause it shall be deleted. |
| Current GM text |
| When hardware or software changes take place, special care should be taken that all necessary data continues to be accessible at least through the required retention period. |
| Proposed new GM text |
| Delete GM 145.A.55(c)(2) Maintenance records (AUS) in toto. |

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| GM 145.A.70(a) Maintenance Organisation Exposition (paragraph 1) |
| Rationale |
| The DASA Website Templates simply refers back to DASR 145.A.70(a) Maintenance Organisation Exposition (MOE), therefore the green text shall be deleted. |
| Current GM text |
| 1. The purpose of the Maintenance Organisation Exposition (MOE) is to detail the procedures, means and methods of the organisation. A MOE template is available from the relevant NMAA desk officer. |
| Proposed new GM text |
| 1. The purpose of the Maintenance Organisation Exposition (MOE) is to detail the procedures, means and methods of the organisation. |

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| GM 145.A.90(a)(1) Continued validity of approval (AUS) |
| Rationale |
| The GM text is applicable to airworthiness authorities rather than regulated organisations, therefore the GM shall be deleted. |
| Current GM text |
| <p>1. When during audits or by other means evidence is found showing non-compliance with the requirements of DASR 145, the NMAA shall take the following actions:</p> <ul style="list-style-type: none"> 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 maintenance organisational approval, until successful corrective action has been taken by the organisation. 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. c. Observations will not require immediate action by the holder of the DASR 145 AMO approval. If appropriate, the NMAA will specify a compliance time. <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 145.A.90(a)(1) Continued validity of approval (AUS) in toto. |

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| GM 145.A.95(a) AMO Findings by the NMAA (AUS) |
| Rationale |
| The GM just defines three terms which are not really relevant to the regulation text nor does it provide any guidance. Therefore the GM shall be deleted. |
| Current GM text |
| <p>1. 'Preventive action' is the action to eliminate the cause of a potential non-compliance, or other undesirable potential situation.</p> <p>2. 'Corrective action' is the action to eliminate or mitigate the root cause(s), and prevent recurrence of an existing detected non-compliance, or other undesirable condition or situation. Proper determination of the root cause(s) is crucial for defining effective corrective actions to prevent reoccurrence.</p> <p>3. 'Correction' is the action to eliminate a detected non-compliance.</p> |
| Proposed new GM text |
| Delete GM 145.A.95(a) AMO Findings by the NMAA (AUS) in toto. |

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| GM 145.A.95(a)(1) AMO Findings by the NMAA (AUS) |
| Rationale |
| The GM is a brief description on root cause analysis. Though this may be useful, root cause analysis should be a well known process and is not required in DASR. |
| Current GM text |
| <p>ROOT CAUSE ANALYSIS</p> <p>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.</p> <p>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.</p> <p>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.</p> |
| Proposed new GM text |
| Delete GM 145.A.95(a)(1) AMO Findings by the NMAA (AUS) in toto. |

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|---|
| GM 145.A.95(a)(2) AMO Findings by the NMAA (AUS) |
| Rationale |
| The regulation clause is a simple clear requirement “Define a corrective action plan” the GM does not add any value or guidance and shall be deleted. |
| Current GM text |
| The corrective action plan defined by the organisation should address the effects of the non-compliance, as well as its root cause. |
| Proposed new GM text |
| Delete GM 145.A.95(a)(2) AMO Findings by the NMAA (AUS) in toto. |

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| GM 145.A.95(c) AMO Findings by the NMAA (AUS) |
| Rationale |
| The GM is stating that in addition to findings listed in 145.A.95(b) and (c), DASA may make observations. This is not relevant to the regulation clause, 145.A.95 is related to findings by the NMAA. EMAR and EASA do not mention observations, any observations along with findings would be communicated to the AMO. Therefore the GM adds no value and shall be deleted. |
| Current GM text |
| Further to the findings listed in DASR 145.A.95(b) and DASR 145.A.95(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 145.A.95(c) AMO Findings by the NMAA (AUS) in toto. |

NPA 2020-023 Response Sheet
DASR PART 145 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 Feb 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 [] |