



DEFENCE AVIATION SAFETY AUTHORITY

NOTICE OF PROPOSED AMENDMENT FOR DASR CHANGE PROPOSAL 2021-035

IMPROVEMENTS TO DASR M SUBPART H AND LINKED REGULATIONS

INTRODUCTION

Applicability

1. This proposal is applicable to all Continuing Airworthiness Management Organisations (CAMO) and DASR 145 Maintenance Organisations involved in the issue of Certificate of Release to Service (CRS).

Purpose

2. The purpose of this Notice of Proposed Amendment (NPA) is to allow for community consultation on the proposed amendments that provide additional clarity and guidance to the Regulation, Acceptable Means of Compliance (AMC) and Guidance Material (GM) concerning aircraft and component CRS issued by an organisation that does not hold a DASR 145 maintenance organisation approval or DASR 21 production approval.

3. This proposal clarifies DASR regulations M.A.708, M.A.710 and M.A.802.

4. The proposed amendments are specifically intended to:

- a. simplify and clarify the Regulation, AMC and GM relating to the issue of CRS; and
- b. introduce AMC for Alternate Artefacts from production organisations.

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

- a. improve understanding on compliance with DASR in regards to the issue of CRS; and
- b. provide CAMOs and DASR 145 Maintenance Organisations a defensible and agile framework for acceptance of aircraft and component CRS, issued by an organisation that does not hold a DASR 145 maintenance organisation approval or DASR 21 production approval.

Background

6. To aid DASR uptake and enable transition by the regulated community, numerous green text additions were added to DASR that resulted in a significant amount of additional information being introduced into DASR. The initial green text included DASR M.A. Subpart H, which provided regulations for aircraft and component CRS to be issued by a non DASR 145 maintenance organisation.

7. European Military Airworthiness Requirements (EMAR) M does not include any information in Subpart H. The reason is that the EMAR rationale assumes that only EMAR 145 approved maintenance organisations will exist therefore Subpart H is not applicable in EMAR M.

Benefits of proposed change

8. In line with DASA's regulatory strategy, continuing airworthiness regulations are moving towards closer alignment with EMAR. This is achieved through review of existing Australian unique content, and reduction where practicable. The proposed changes are expected to improve clarity on DASR



compliance requirements in regards to CRS and provide regulated entities greater flexibility in meeting capability outcomes.

Proposed Amendment

9. The proposed amendment to DASR M is presented at Annex A.

Implementation Strategy

10. The proposed change is intended to be released by DASA in the July 2023 DASR release. Training material on Certificate of Release to Service will be revised in conjunction with the respective DASR release. The proposed amendment of DASR M does not change 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 B.

12. Responses are to be submitted by email to dasa.dasr@defence.gov.au. Hardcopies of the NPA Comment Sheet are not required.

Timing

13. Comments on this NPA are to be forwarded to DASA by close of business 09 Jun 23.

Additional Information

14. Additional information on this NPA is available via dasa-dcarltregs@dpe.protected.mil.au.



DISPOSITION OF RESPONSES RECEIVED

15. A Comment Response Document will be prepared and published on the [DASA Website](#). DASA will not individually acknowledge or respond to comments or submissions.

M. MCGUINNESS

Commander
Acting Director Continuing Airworthiness
Defence Aviation Safety Authority
Tel: (02) 9537 6042

May 23

Annexes:

- A. NPA for DCP 2021-035 - Proposed Changes to DASR M.
- B. NPA for DCP 2021-035 - Response Sheet



NPA for DCP 2021-035 - Proposed Changes to DASR M

DASR CLAUSE: New GM1 M.A.708

RATIONALE FOR CHANGE

GM M.A.708(c) text to be moved to new GM1 M.A.708 as the text is applicable to all of M.A.708. Minor change for language consistency.

CURRENT REGULATION TEXT

N/A this is new GM

REVISED REGULATION TEXT

GM1 M.A.708 - Continuing airworthiness management AUS)

In the context of this regulation, a DASR 145 AMO also includes another maintenance organisation accepted by DASA in accordance with DASR M.A.201(g).

DASR CLAUSE: DASR M.A.708(b) paragraph 4.

RATIONALE FOR CHANGE

This change aligns DASR with EMAR by including the text DASR 145 and retaining the flexibility of DASR M Subpart H.

CURRENT REGULATION TEXT

4. ensure that all maintenance is carried out in accordance with the AMP and released in accordance with [DASR M.A.Subpart H—Certificate of Release to Service \(CRS\) \(AUS\)](#);

REVISED REGULATION TEXT

4. ensure that all maintenance is carried out in accordance with the AMP and released in accordance with DASR 145 [or DASR M.A Subpart H](#);

DASR CLAUSE: GM M.A.708(c)

RATIONALE FOR CHANGE

GM M.A.708(c) to be deleted as the text will be moved to new GM1 M.A.708.

CURRENT REGULATION TEXT

In the context of this regulation, a DASR 145 AMO also includes one assessed to be equivalent at DASR M.A.201(g).

REVISED REGULATION TEXT

N/A GM M.A.708(c) - Continuing airworthiness management (AUS) to be deleted.

DASR CLAUSE: M.A.710(a) paragraph 8

RATIONALE FOR CHANGE

This change promotes clarity in the DASR and more closely aligns with EMAR, that maintenance is released IAW DASR 145 and retaining the flexibility of DASR M Subpart H.

CURRENT REGULATION TEXT

8. all maintenance has been released in accordance with [DASR M.A.Subpart H](#); and

REVISED REGULATION TEXT

8. all maintenance has been released in accordance with DASR 145 or [DASR M.A Subpart H](#); and

DASR CLAUSE: M.A.802**RATIONALE FOR CHANGE**

The proposed amendment is to clarify this regulation regarding to the issue of a component certificate of release to service issued by an organisation that does not hold a DASR 145 maintenance organisation approval or DASR 21 production approval.

CURRENT REGULATION TEXT

A certificate of release to service shall be issued at the completion of any maintenance carried out on an aircraft component by a maintenance organisation approved in accordance with DASR 145, or equivalent in accordance with DASR M.A.201(g).
The authorised release certificate identified as DASR Form 1, constitutes the component certificate of release to service, except when such maintenance on aircraft components has been performed in accordance with DASR M.A.201(g) in which case the maintenance is subject to aircraft release procedures in accordance with DASR M.A.801.

REVISED REGULATION TEXT

Except for aircraft components released to service by a DASR 145 maintenance organisation or DASR 21 production approval, the certificate of release to service / authorised release certificate shall be issued according to this Subpart.

A certificate of release to service shall be issued at the completion of any maintenance carried out on an aircraft component by a maintenance organisation approved in accordance with DASR 145, or another maintenance organisation accepted by DASA in accordance with DASR M.A.201(g).

For new components, an authorised release certificate identified as DASR Form 1, or required artefact from another production organisation accepted by DASA, constitutes the component certificate of release to service.

DASR CLAUSE: New AMC1 M.A.802**RATIONALE FOR CHANGE**

This change will provide AMC for the acceptability of parts manufactured by organisations that do not have a DASR 21 production approval. This change will support the application of the provisions of DASA recognition certificates with respect to the production of aviation parts not accompanied with a DASR Form 1.

CURRENT REGULATION TEXT

N/A this is new AMC

REVISED REGULATION TEXT**AMC1 M.A.802 - Component certificate of release to service (AUS)**

1. A production organisation is accepted by DASA if:
 - a. the organisation is oversighted by a recognised airworthiness authority; and
 - b. 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 production 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 production organisation to become a DASR Subpart G production organisation or produce components in accordance with DASR Subpart F,
 - b. the production organisation is unable to provide the alternate artefact under an existing DASR 21G organisation approval using the sub-contractor provisions of DASR 21.A.139 — Quality System,
 - c. the production 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.

NPA FOR DCP 2021 - 035 Response Sheet

IMPROVEMENTS TO DASR M SUBPART H AND LINKED REGULATIONS

Please forward this sheet as an email attachment to [DASA](#) by 09 Jun 23. A word version of this response sheet can be found via obj no: [BO3960659](#) or alternatively contact [DASA](#).

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 []

