

**NOTICE OF PROPOSED AMENDMENT 03/2017 DEFENCE AVIATION SAFETY
REGULATIONS FOR
AIRCRAFT MAINTENANCE TRAINING ORGANISATIONS (DASR 147)**

Applicability

1. This proposal is applicable to all organisations which deliver aircraft maintenance training, including Initial Employment Training at RAAFSTT; post-graduate aircraft-related technical training and aircraft type training. This Notice of Proposed Amendment (NPA) is issued by the Director General Defence Aviation Safety Authority (DG DASA) for, and on behalf of the Defence Aviation Safety Authority (DASA).

Purpose

2. This NPA is the initial issue of draft DASR 147 – *Aircraft Maintenance Training Organisations* and its purpose is to seek feedback from the regulated community on the proposed regulation, with the intent of formally releasing DASR 147 in Mar 18.

Introduction of DASR

3. On Sep 13 Air Force Board noted the current Defence airworthiness regulations no longer represented best international practice and directed ‘DGTA and DACPA to provide CAF with a brief in Dec 13 recommending migration of the current airworthiness regulations to a more efficient and contemporary military airworthiness regulatory system over the next five years’. In Nov 13, the Defence Aviation Authority directed DACPA/DGTA to develop new Defence Aviation Safety Regulation (DASR) with the specific requirements that: DASR be published as a flat suite of regulations in a single Interactive Electronic Regulatory Manual (IERM); DASR to incorporate Better Practice Regulatory principles; DASR be based on contemporary regulatory framework (ICAO definitions); DASR to incorporate full EMAR (and explore EASA Regulations); DASR to be published by EOY2015; and finally DASR to be fully implemented by EOY2018.

4. With an indicative five year implementation schedule for which 2014 was used to conduct analysis and due diligence with all existing and newly proposed regulations mapped to the new DASR structure; 2015 was utilised to develop IERM (BETA version) of the new DASR; and 2016 to 2018 are being used to progressively transition organisations to the DASR.

5. Accordingly, a two phase strategy is utilized to treat identified risks as part of DASR transition. Phase 1 is associated with low risk, low benefit: Organisations will initially migrate to the DASR with minimal impact to existing management constructs, contracts and organisational structures. Phase 2 is associated with low risk, high benefit: Organisations can then exploit the flexibility and efficiencies afforded by the DASR in a manner and rate that is sensible to their unique circumstance.

Introduction of DASR 147

6. Under the previous Technical Airworthiness Regulations, Defence’s airworthiness authorities did not approve organisations which delivered aircraft maintenance training. However, both EMAR and EASA regulations require the approval of organisations which deliver aircraft-related maintenance training, in accordance with Part 147 of those requirements/ regulations. Defence Aviation Safety Regulations 147 aligns DASR with EMAR and EASA Part 147.

7. In Europe, post-secondary school technical training is based on syllabi, whereas Australia uses competencies which are delivered by Registered Training Organisations (RTO), operating in accordance with the Australian Skills Quality Authority's Standards for RTOs. Despite the different educational philosophies between Europe and Australia, there is considerable commonality between the Standards for RTOs and EMAR/EASA Part 147. DASR 147 leverages off this commonality as far as practicable.

8. Defence has training governance policies and processes and this regulation uses these policies and processes as far as practical. However, some aspects of how to implement those policies and processes are yet to be agreed. Accordingly, some Acceptable Means of Compliance and Guidance Material are marked as 'Reserved'. The absence of such clauses is not expected to have any material effect on the regulated community.

9. Initial training of aircraft maintenance personnel is based on traditional trade structures, whereas initial training under EASA/EMAR 147 is based on EASA/EMAR Pt 66 (Aircraft Maintenance Licences) syllabi. One consequence of this difference is that DASR 147 contains a number of Australian-unique clauses, AMC and GM to accommodate this difference, noting that some of this material is incomplete.

NPA 03/2017

10. This NPA introduces regulations to approve organisations which deliver aircraft-related maintenance training. The proposed regulations can be viewed using the following link:
DASR 147

How to submit comments on this NPA

11. Responses to this NPA are to be recorded on the NPA Response Sheet included at annex A.

12. Responses are to be submitted by email to [DASA](#). Hardcopies of the NPA Response Sheet are not required.

Timing

13. Comments to this NPA are to be received by close of business 15 December 2017.

Disposition of comments received

14. A Summary of Responses will be prepared and published on the DASP Internet website <http://www.defence.gov.au/dasp/>. The DASA will not individually acknowledge or respond to comments or submissions.

Original signed
5 Oct 17

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AIRCDRE
DG DASA

Tel: (03) 9282 3228

Oct 17

Annex:

A. NPA 01/2017 – Comment Sheet

NPA 03/2017 Response Sheet DASR Personnel Licensing Regulations

Please return this response sheet by 15 Dec 17, via email attachment to [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 [] ADF AEO/AMO [] Commercial AEO/AMO [] Operational HQ (WG/FEG/Command) [] Defence Regulatory, Technical or Logistics policy agency [] Other commercial entity [], Other [] Please describe:-