



DEFENCE AVIATION SAFETY AUTHORITY

NOTICE OF PROPOSED AMENDMENT FOR DASR CHANGE PROPOSAL 2024-033

DASR PART M PROPOSED AMENDMENTS TO ADF UNIQUE ACCEPTABLE MEANS OF COMPLIANCE AND GUIDANCE MATERIEL

INTRODUCTION

Applicability

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

Purpose

2. The purpose of this NPA is communicate intended rationalisation of ADF unique DASR M Acceptable Means of Compliance (AMC) and Guidance Material (GM), prior to the introduction of content from European Military Airworthiness Requirements (EMAR) M Edition 2.0 and EMAR CAMO Edition 1.0.

3. The proposed amendments impact ADF unique green text in the following DASR M Subparts:

- a. Subpart B – Occurrence Reporting
- b. Subpart C – Continuing Airworthiness
- c. Subpart H – Aircraft Continuing Airworthiness Record System
- d. Subpart G – Continuing Airworthiness Management Organisation (CAMO)
- e. Subpart I – Military Airworthiness Review Certificate (MARC)

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

- a. Simplify and clarify DASR M by rationalising (amend, remove or relocate) ADF unique green text
- b. Facilitate introduction of EMAR M Edition 2.0 and EMAR CAMO Edition 1.0 into DASR.

Background

5. To assist the Defence aviation community in initially transitioning to DASR, unique Australian AMC and GM green text was developed. This content has been the subject of review – the result of which have determined that some green text should be amended, removed or relocated to improve clarity and readability.

Proposed Amendment(s)

6. The proposed amendments and/or deletions are presented at Annexes A and B.

Implementation Strategy

7. The proposed amendments are intended to be released by DASA in the February 2025 DASR release. This amendment of DASR M does not change the intent of the regulation or any



compliance requirements. If green text contains useful background information or educational value, consideration will be given to moving the text to the DASP Manual Volume 3.

HOW TO SUBMIT COMMENTS ON THIS NPA

Format

8. Responses to this NPA are to be recorded on the NPA Response Sheet at Annex C.
9. Responses are to be submitted by email to dasa.dasr@defence.gov.au. Hardcopies of the NPA Comment Sheet are not required.

Timing

10. Comments on NPA for DCP 2024-033 are to be provided by close of business 13 Dec 24.

Additional Information

11. Please send any requests for additional information or questions concerning this NPA to DASA at dasa.dasr@defence.gov.au

DISPOSITION OF RESPONSES RECEIVED

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

A Newman

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Nov 24

Annexes:

- A. NPA for DCP 2024-033 - Proposed Changes to DASR AMC
- B. NPA for DCP 2024-033 - Proposed Changes to DASR GM
- C. NPA for DCP 2024-033 - Response Sheet



NPA for DCP 2024-033

PROPOSED CHANGES TO DASR M AMC

AMC M.A.202(c)
Rational
Correct the form name
Current AMC Text
Form 44 – Technical Occurrence Report, as established by the MAA, or
Proposed AMC Text
Form 44 –Occurrence Report, as established by the MAA, or

AMC M.A.301(a)(1)
Rational
DASR paragraph 3, second last sentence ' <i>If a component of the pre-flight inspection is accomplished by the DASR 145 AMO, it should be incorporated into the AMP.</i> ' is not in EMAR. The text was originally green text in the initial DASR release. The AMC has been amended over time and the text has been black for most earlier versions. Text is overly prescriptive and may lead to inefficiencies in the management of the AMP.
Current AMC Text
If a component of the pre-flight inspection is accomplished by the DASR 145 AMO, it should be incorporated into the AMP.
Proposed AMC Text
Nil

AMC M.A.706(d)
Rational
It is a duplicate of the text in AMC M.A.706 plus " <i>Additionally, the Continuing Airworthiness Manager (CAM) requires Engineering Executive (EngExec) status with the Institute of Engineers Australia or an equivalent professional body recognised by the IEAust.</i> " that will be relocated to AMC M.A.706 as part of a separate DCP.



Current AMC Text

The Continuing Airworthiness Manager (CAM) and the nominated deputy require formal acceptance by the MAA which is granted through the corresponding DASR Form 4—Acceptance of Nominated Management Personnel.

The Continuing Airworthiness Manager (CAM) should have:

1. practical experience and expertise in the application of aviation safety standards and safe operating practices;
2. a comprehensive knowledge of:
 - a. relevant parts of operational requirements and procedures;
 - b. the MAOC holder's Operations Specifications when applicable;
 - c. the need for, and content of, the relevant parts of the MAOC holder's Operations Manual when applicable;
3. knowledge of quality systems;
4. five years relevant work experience of which at least two years should be from the aeronautical industry in an appropriate position;
5. a relevant engineering degree or an aircraft maintenance technician qualification with additional education acceptable to the MAA. 'relevant engineering degree' means an engineering degree from aeronautical, mechanical, electrical, electronic, avionic or other studies relevant to the maintenance and continuing airworthiness of aircraft/aircraft components;
6. The above recommendation may be replaced by five years of experience additional to those already recommended by paragraph 4 above. These five years should cover an appropriate combination of experience in tasks related to aircraft maintenance and/or continuing airworthiness management (engineering) and/or surveillance of such tasks;
7. Chartered Professional Engineer (CPEng), Chartered Engineering Technologist (CEngT) or Chartered Engineering Associate (CEngA) status with the Institute of Engineers Australia (IEAust) or an equivalent professional body recognised by the IEAust. Additionally, the Continuing Airworthiness Manager (CAM) requires Engineering Executive (EngExec) status with the Institute of Engineers Australia or an equivalent professional body recognised by the IEAust;
8. thorough knowledge with the organisation's continuing airworthiness management exposition;
9. 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 General Familiarisation and could be imparted by a DASR 147 organisation, by the manufacturer, or by any other organisation accepted by the MAA.

"Relevant sample" means that these courses should cover typical systems embodied in those aircraft being within the scope of approval
10. knowledge of maintenance methods;
11. knowledge of applicable regulations.

Proposed AMC Text

Nil



AMC M.A.708(c) paragraph 4 - 6)
Rational
Green Text paragraphs 4 thru 6 is overly prescriptive and adds no value in the context of regulation content and existing EMAR AMC.
Current AMC Text
<p>4 For line maintenance, the actual layout of the line maintenance contract/tasking the IATA Standard Ground Handling Agreement may be used as a basis, but this does not preclude the MAA from ensuring that the content of the contract/tasking is acceptable to them, and especially that the contract/tasking allows the CAMO to properly exercise its maintenance responsibility. Those parts of a contract/tasking that have no bearing on the technical or operational aspects of airworthiness are outside the scope of this paragraph.</p> <p>5 It is possible to contract/task another Operating Organisation that is not directly approved under DASR 145. In this case the CAMO's continuing airworthiness management exposition should include appropriate procedures to ensure that all this contracted/tasked maintenance is ultimately performed on time by organisations approved under DASR 145 in accordance with the contract/tasking CAMO's data. In particular the quality system procedures should place great emphasis on monitoring compliance with the above. The list of DASR 145 approved contract/tasking, or a reference to this list, should be included in the CAMO's continuing airworthiness management exposition.</p> <p>6. Such a maintenance arrangement does not absolve the Operating Organisation from its overall continuing airworthiness responsibility unless exception clause DASR M.A.201(k) is enacted. Specifically, in order to accept the maintenance arrangement, the MAA should be satisfied that such an arrangement allows the Operating Organisation to ensure full compliance with responsibilities pursuant to DASR M.A.201—Responsibilities.</p>
Proposed AMC Text
Nil

AMC M.A.710(a)(1)
Rational
Delete AMC as it repeats the intent of the regulation
Current AMC Text
Determine whether the information about the utilisation of the aircraft has been recorded properly. The records should be examined to the extent necessary to determine if the information is up to date and accurate.
Proposed AMC Text
Nil
AMC M.A.710(a)(3) paragraph 1, 2, 5, 6 & 7
Rational
Delete AMC as it repeats the intent of the regulation and is overly prescriptive. Delete Heading above paragraph 7



<p>Current AMC Text</p> <p>1. Examine the records of compliance with the maintenance program to determine whether each maintenance task due to be carried out in accordance with the aircraft's maintenance program has been carried out and properly certified.</p> <p>2. If the record of compliance with the maintenance program is kept in a computerised system, then a report generated by the computerised system may be used to comply with this requirement; provided the report clearly shows when the maintenance was last carried out, when it is next due and highlight any overdue task. The airworthiness review staff carrying out the review should ensure that such computer-generated reports include all maintenance tasks required to be carried out under the aircraft's maintenance program.</p> <p>5. Examples of documents that may substantiate maintenance has been carried out include:</p> <ol style="list-style-type: none"> maintenance records for maintenance carried out on the aircraft; copies of authorised release certificates for product, parts or appliances; log books for products such as engines and propellers; and log cards for landing gear <p>6. For product, parts or appliances, the document that substantiates that the maintenance has been carried out on the product, parts or appliances should relate to the product that is identified in the records kept by part number and serial number if applicable.</p> <p>ERROR CAPTURING METHODS</p>
<p>Proposed AMC Text</p> <p>Nil</p>
<p>AMC M.A.710(a)(4)</p>
<p>Rational</p> <p>Repeats the intent of the regulation but useful educational materiel - to be moved to DASPMAN Vol 3</p>
<p>Current AMC Text</p> <p>RECTIFICATION OF DEFECTS</p> <p>Examine the aircraft's continuing airworthiness record system to determine whether there is any defect in the aircraft that needs rectification before flight. Defects that require rectification before flight should be rectified before the issue of an airworthiness review certificate.</p> <p>DEFERRED DEFECTS</p> <p>Examine the existing deferred defects as recorded in the aircraft's continuing airworthiness record system to determine whether deferral of rectification has been done.</p>
<p>Proposed AMC Text</p> <p>Nil</p>
<p>AMC M.A.710(a)(5)</p>
<p>Rational</p> <p>Repeats the intent of the regulation but useful educational materiel – to be moved to DASPMAN Vol 3</p>



Current AMC Text
<p>1. Examine the records containing compliance with Airworthiness Directives (AD) to determine whether actions required by each AD that applies to the aircraft, product, parts or appliances fitted to the aircraft have been complied with. An examination of documents that substantiate each AD has been complied with should be carried out to verify that information kept is correct. Examples of documents that may substantiate an AD has been complied with, includes:</p> <ul style="list-style-type: none"> a. maintenance records for maintenance carried out on the aircraft; b. copies of authorised release certificates for product, parts or appliances; and c. log books for products such as engines and propellers. <p>2. For a product, parts or appliances, the document that substantiates that the AD has been complied with in relation to the product, parts or appliances should relate to the product that is identified in the records by part number and serial number if applicable.</p> <p>3. Where an AD requires compliance with requirements contained in another document such as a service bulletin (SB), a record of compliance with the service bulletin would be acceptable as evidence of compliance with the AD.</p>
Proposed AMC Text
Nil
AMC M.A.710(a)(6)
Rational
Repeats content from M.A.304 but useful educational materiel - to be moved to DASPMAN Vol 3.
Current AMC Text
Examine the records of modifications kept to determine whether there is a DASR 21 (see DASR M.A.304 —Data for modifications and repairs) approval for each design of the modification. For the purpose of this paragraph, a modification includes a repair that involves change to the approved design of the aircraft.
Proposed AMC Text
Nil
AMC M.A.710(a)(7)
Rational
Repeats the intent of the regulation but useful educational materiel - to be moved to DASPMAN Vol 3



Current AMC Text
<p>1. Examine the records of life-limited components kept to determine whether part number, serial number, has correctly identified each life-limited part and whether the life limit has been exceeded for any of the parts.</p> <p>2. In addition, documents that have been used to substantiate remaining life at installation should be checked to verify that information kept for life-limited components is correct. Examples of such substantiating documents include:</p> <ul style="list-style-type: none"> a. maintenance records for installation of the parts; b. authorised release certificates for the parts; and c. life limited component history/log card.
Proposed AMC Text
Nil
AMC M.A.710(a)(10)
Rational
Repeats the intent of the regulation but useful educational materiel - to be moved to DASPMAN Vol 3
Current AMC Text
Examine the aircraft's continuing airworthiness records to determine whether the aircraft's configuration as recorded complies with the specification mentioned in military type certificate data sheet (TCDS) for the aircraft, engine and propeller. Any variation of configuration from MTC should be supported by a DASR 21 approval.
Proposed AMC Text
Nil



AMC M.A.713(a)
Rational
<p>The first sentence is based on EASA AMC M.A.713 and was included in the initial DASR release, it is N/A in EMAR as the content is in EMAR AMC M.B.706 Changes.</p> <p>Second sentence was added as per DCP 2018-050 and maintains consistency with DASR AMC 145.A.85(a) to use a DASR Form 2</p> <p>Deleting the first paragraph to maintain alignment with EMAR as the regulation clause is a clear statement, and keep the 2nd paragraph as it provides a link DASR Form 2.</p>
Current AMC Text
<p>1 This paragraph covers scheduled changes to the continuing airworthiness organisations (CAMO) approval. The primary purpose of this paragraph is to enable the CAMO to remain approved if agreed by the MAA during negotiations about any of the specified changes. Without this paragraph the approval would automatically be suspended in all cases.</p> <p>2 All changes referred to in DASR M.A.713(a), should be notified to the MAA on the same form and in the same manner used for application, see DASR AMC M.A.702(a).</p>
Proposed AMC Text
<p>1 All changes referred to in DASR M.A.713(a), should be notified to the MAA on the same form and in the same manner used for application, see DASR AMC M.A.702(a)!</p>



GM M.A.301(a)(3)
Rational
GM is related to the management of an AMP IAW M.A.302(d) and M.A.708(b)(4) – to be moved to DASPMAN Vol 3
Current GM Text
<p>1. The situation may arise where a contracted/tasked maintenance organisation advises the CAMO that the contracted/tasked maintenance cannot be carried out by the required contracted/tasked timeframe and seeks a one-off extension of the promulgated maintenance interval. In processing the request for a maintenance interval extension the CAMO has the following options available:</p> <ul style="list-style-type: none"> a. where the packaged/promulgated interval is less than the engineering justified interval, extend the interval up to a maximum of the engineering interval; b. extend the task interval using the CAMO's indirect approval procedure, if suitably privileged, either once-off or permanently, c. request DASR 21J design support for the requested interval extension; or d. utilise the Command Clearance process to operate the aircraft IAW DASR M.A.301(a)(2) <p>2. Extending the Packaged Interval. Interval flexibility may exist between a maintenance task's packaged/promulgated interval and its engineering/design interval in the AMP. The task may be packaged at a lesser interval maintenance efficiency due to tasks required in the same area or aligning maintenance to be conducted in blocks. If this is the case, and provided the CAMO has the underlying analysis that identifies the engineering interval and the reasons why the task was packaged at a lesser interval, the CAMO may authorise an extension to the packaged interval up to a maximum of the recorded engineering interval.</p> <p>3. Extend the AMP Task Interval. If the AMP task interval has been reached, the CAMO may have sufficient data to extend the AMP task interval either once off, for a defined period, or permanently. To amend the AMP the CAMO must have the privilege from the MAA and sufficient scope as agreed in the indirect approval procedure. Note: where a task's interval has been extended permanently, the task may still be packaged as desired (not exceeding the extended interval).</p> <p>4. Request DASR 21J Design Support. If the two options at para 1a and b above are not applicable, the CAMO may request DASR 21J design support to either extend the interval once off, for a defined period, or permanently.</p> <p>5. Utilise the Command Clearance process. DASR M.A.301(a)(2).contains provisions for the Operating Organisation to deviate from the Initial/Continued/Continuing regulations.</p> <p>6. For servicings with multiple tasks, the decision on extending the interval and the method used will be dependent on the individual circumstances of each task within the servicing. A combination of para 1a to d may be necessary.</p> <p>7. It is important to note that extending a maintenance task beyond its promulgated interval may reduce the preventive effect of the task by increasing the risk of exposure to the failure consequences of the failure mode being addressed. In certain situations extension of maintenance could adversely affect the operational capability and/or safety of the aircraft. Also, the percentage by which the interval is extended does not universally reflect the increase in risk in exposure to the failure consequences of the failure mode(s) the task is addressing. The increase in risk with the extension of a task's interval needs to be assessed individually based on the underlying Reliability Centred Maintenance (RCM) analysis that justified the existing interval and the context in which the interval extension is being asked.</p>
Proposed GM Text
Nil



GM M.A.301(a)(8)
Rational
GM repeats the glossary definition for maintenance check flights and is not required
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 GM Text
Nil

GM M.A.305(h)
Rational
This is the same GM as M.A.305(h), M.A.306(c), M.A.707(e), M.A.712(c), M.A.714, 145.A.35(j), 145.A.55(c) and 145.55(c)(3). Not regulatory materiel - to be moved to DASPMAN Vol 3.
Current GM Text
Other legislative requirements, overriding DASR, may require an organisation to keep records for a longer period of time.
Proposed GM Text
Nil

GM M.A.306(c)
Rational
This is the same GM as M.A.305(h), M.A.306(c), M.A.707(e), M.A.712(c), M.A.714, 145.A.35(j), 145.A.55(c) and 145.55(c)(3). Not regulatory materiel - to be moved to DASPMAN Vol 3.
Current GM Text
Other legislative requirements, overriding DASR, may require an organisation to keep records for a longer period of time.
Proposed GM Text
Nil



GM M.A.704(c)
Rational
As the indirect approval procedure is approved by DASA, the GM adds no value.
Current GM Text
The indirect approval procedure may not include any changes to the CAMO defined in DASR M.A.713(a) .
Proposed GM Text
Nil

GM M.A.707(e)
Rational
This is the same GM as M.A.305(h), M.A.306(c), M.A.707(e), M.A.712(c), M.A.714, 145.A.35(j), 145.A.55(c) and 145.55(c)(3). Not regulatory materiel - to be moved to DASPMAN Vol 3.
Current GM Text
Other legislative requirements, overriding DASR, may require an organisation to keep records for a longer period of time
Proposed GM Text
Nil

GM M.A.708(b)(2)
Rational
GM is largely EMAR content – editorial change
Current GM Heading
GM M.A.708(b)(2) - Continuing airworthiness management (AUS)
Proposed GM Heading
GM M.A.708(b)(2) - Continuing airworthiness management.



GM M.A.708(b)(2)(ii)
Rational
GM repeats the regulation but useful educational materiel – to be deleted
Current GM Text
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 MAA
Proposed GM Text
Nil

GM M.A.708(b)(4)
Rational
Same as GM M.A.301(a)(3) – to be moved to DASPMAN Vol 3



Current GM Text	
1.	<p>The situation may arise where a contracted/tasked maintenance organisation advises the CAMO that the contracted/tasked maintenance cannot be carried out by the required contracted/tasked timeframe and seeks a one-off extension of the promulgated maintenance interval. In processing the request for a maintenance interval extension the CAMO has the following options available:</p> <ol style="list-style-type: none"> a. where the packaged/promulgated interval is less than the engineering justified interval, extend the interval up to a maximum of the engineering interval; b. extend the task interval using the CAMO's indirect approval procedure, if suitably privileged, either once-off or permanently, c. request DASR 21J design support for the requested interval extension; or d. utilise the Command Clearance process to operate the aircraft IAW DASR M.A.301(a)(2) <p>2. Extending the Packaged Interval. Interval flexibility may exist between a maintenance task's packaged/promulgated interval and its engineering/design interval in the AMP. The task may be packaged at a lesser interval maintenance efficiency due to tasks required in the same area or aligning maintenance to be conducted in blocks. If this is the case, and provided the CAMO has the underlying analysis that identifies the engineering interval and the reasons why the task was packaged at a lesser interval, the CAMO may authorise an extension to the packaged interval up to a maximum of the recorded engineering interval.</p> <p>3. Extend the AMP Task Interval. If the AMP task interval has been reached, the CAMO may have sufficient data to extend the AMP task interval either once off, for a defined period, or permanently. To amend the AMP the CAMO must have the privilege from the MAA and sufficient scope as agreed in the indirect approval procedure. Note: where a task's interval has been extended permanently, the task may still be packaged as desired (not exceeding the extended interval).</p> <p>4. Request DASR 21J Design Support. If the two options at para 1a and b above are not applicable, the CAMO may request DASR 21J design support to either extend the interval once off, for a defined period, or permanently.</p> <p>5. Utilise the Command Clearance process. DASR M.A.301(a)(2) contains provisions for the Operating Organisation to deviate from the Initial/Continued/Continuing regulations.</p> <p>6. For servicings with multiple tasks, the decision on extending the interval and the method used will be dependent on the individual circumstances of each task within the servicing. A combination of para 1a to d may be necessary.</p> <p>7. It is important to note that extending a maintenance task beyond its promulgated interval may reduce the preventive effect of the task by increasing the risk of exposure to the failure consequences of the failure mode being addressed. In certain situations extension of maintenance could adversely affect the operational capability and/or safety of the aircraft. Also, the percentage by which the interval is extended does not universally reflect the increase in risk in exposure to the failure consequences of the failure mode(s) the task is addressing. The increase in risk with the extension of a task's interval needs to be assessed individually based on the underlying Reliability Centred Maintenance (RCM) analysis that justified the existing interval and the context in which the interval extension is being asked.</p>
Proposed GM Text	
Nil	



GM M.A.710(a)
Rational
The first sentence repeats the intent of the regulation and can be deleted. The remainder to be moved to DASPMAN Vol 3.
Current GM Text
<p>The airworthiness review staff of the CAMO are required to examine the continuing airworthiness records for the aircraft to determine whether continuing airworthiness requirements are being met for the aircraft.</p> <p>For many aircraft, the quantity of records that must be examined and the level of examination required will be extensive. It is anticipated that the airworthiness review staff will be assisted by other employees of the CAMO and/or appropriately experienced personnel in this regard. This does not prevent other personnel from assisting to retrieve records, compile information and prepare reports etc. for the examination by the airworthiness review staff. However, it is up to the airworthiness review staff carrying out the airworthiness review to be satisfied with the source, authenticity and accuracy of the information made available to them.</p> <p>The airworthiness review staff are expected to have a level of understanding of the continuing airworthiness records system for the aircraft that allows them to carry out the review without error.</p>
Proposed GM Text
Nil
GM M.A.710(e)
Rational
The regulation clause is a simple statement with sub clauses about when a MARC can be issued. The GM is not in EMAR or EASA M regulations. It provides information about the airworthiness review and was probably included in the early releases of DASR as there was no a lot of information on how to conduct the review – to be moved to DASPMAN Vol 3.
Current GM Text
<p>A DASR Form 15b—Military Airworthiness Review Certificate, must be used when a CAMO has a privilege to issue a MARC. DASR Form 15a—Military Airworthiness Review Certificate - Issue Recommendation, is to be used when a CAMO does not have a privilege and the MAA issues the MARC. In the case of not having the privilege, the CAMO can subcontract/task another CAMO that has approved scope to conduct MARCs, but by definition cannot issue the MARC for the contracting/tasking CAMO.</p> <p>During airworthiness review of an aircraft, the airworthiness review staff must examine continuing airworthiness records for the aircraft and perform a physical survey of the aircraft to determine whether the aircraft continues to comply with the airworthiness requirements as set out in DASR M.A.710(a) and DASR M.A.710(b).</p> <p>All findings discovered during an airworthiness review should be documented and managed in accordance with the CAMO's quality management system / safety management system, consistent with requirements of M.A.905.</p>
Proposed GM Text
Nil



GM M.A.711(a)(3)
Rational
GM repeats the intent of both M.A.711(a)(3) and M.A.201(k) and can be deleted.
Current GM Text
GM M.A.711(a)(3) - Privileges of the organisation (AUS)
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.
Proposed GM Text
Nil

GM.A.712(b)
Rational
GM is overly prescriptive and can be deleted.
Current GM Text
Monitoring of contracted / tasked DASR M Subpart G activities need not involve independent audit of procedures managed by external organisations. Other methods such as sampling and monitoring the suitability of products may be acceptable to DASA. The method used to monitor contracted / tasked DASR M Subpart G activities should be described in the CAME.
Proposed GM Text
Nil

GM M.A.712(c)
Rational
This is the same GM as M.A.306(c), M.A.707(e), M.A.712(c), M.A.714, 145.A.35(j), 145.A.55(c) and 145.55(c)(3). Not regulatory materiel - to be moved to DASPMAN Vol 3.



Current GM Text
Other legislative requirements, overriding DASR, may require an organisation to keep records for a longer period of time.
Proposed GM Text
Nil

GM M.A.712(e)
Rational
The green text was in the initial DASR release for transitional purposes. GM to be deleted.
Current GM Text
The phrase 'unless the MAA approves otherwise' allows for the case where the entire CAMO is tasked to an organisation separate from the Operating Organisation (see DASR M.A. 201(k)).
Proposed GM Text
Nil

GM M.A.712(g)
Rational
The green text was in the initial DASR release for transitional purposes. GM to be deleted.
Current GM Text
The phrase 'unless the MAA approves otherwise' allows for the case where the entire CAMO is tasked to an organisation separate from the Operating Organisation (see DASR M.A. 201(k)). In this instance the CAMO will be required to establish and maintain a Safety Management System (SMS), in accordance with DASR SMS .
NOTE: that 'Operating Organisation' is the 'Military Air Operator (MAO)' in Defence context.
Proposed GM Text
Nil



GM M.A.713(a)(6)
Rational
Regulation is a clear and simple clause. The GM does not add value and is to be deleted.
Current GM Text
This includes organisations providing CAM services on behalf of the CAMO.
Proposed GM Text
Nil

GM M.A.713(a)(7)
Rational
The regulation clause clearly states 'any change that affects the approval certificate'. The green text adds no value and is to be deleted.
Current GM Text
Changes that affect the Approval Certificate may include: <ol style="list-style-type: none"> 1. a change to the aircraft type and/or model, or 2. A change to the continuing airworthiness services provided.
Proposed GM Text
Nil

GM M.A.714
Rational
This is the same GM as M.A.306(c), M.A.707(e), M.A.712(c), M.A.714, 145.A.35(j), 145.A.55(c) and 145.55(c)(3). Not regulatory materiel - to be moved to DASPMAN Vol 3.
Current GM Text
Other legislative requirements, overriding DASR, may require an organisation to keep records for a longer period of time.
Proposed GM Text
Nil



NPA FOR DCP 2024-033 Response Sheet

DASR PART M PROPOSED AMENDMENTS AND DELETIONS to AMC and GM AS IDENTIFIED BY DASR GREEN TEXT REVIEW

Please forward this sheet as an email attachment to dasa.dasr@defence.gov.au by 13 Dec 24. 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 [<input type="checkbox"/>] Regulated Military entity [<input type="checkbox"/>] Regulated Commercial entity [<input type="checkbox"/>] Wing HQ [<input type="checkbox"/>] Group HQ [<input type="checkbox"/>] ADF Regulatory, Technical or Logistics policy agency [<input type="checkbox"/>] Other commercial entity [<input type="checkbox"/>], Other [<input type="checkbox"/>] Please describe:
Do you consent to your name being published as an NPA respondent within the NPA Summary of Responses:	YES [<input type="checkbox"/>] NO [<input type="checkbox"/>]

