



DEFENCE AVIATION SAFETY AUTHORITY

NOTICE OF PROPOSED AMENDMENT FOR DASR CHANGE PROPOSAL 2024 - 015

DASA REGULATORY POSITION TO DASR AMC 145.A.30(f) ALTERNATIVE MEANS OF COMPLIANCE

INTRODUCTION

Applicability

1. This proposal is applicable to maintenance organisations who perform aircraft composite repairs.

Purpose

2. The purpose of this NPA is to enable community input into the proposed amendment of AMC1 145.A.30(f) - Personnel requirements (AUS), and associated changes to DASP Manual Volume 3 – DASP Guidance Chapter 8 Continuing Airworthiness.

Background

3. DASA received feedback via the Defence Aviation Regulations Industry Consultative Committee (DARICC) that DASR AMC1 145.A.30(f) required review – specifically, the accepted standard for qualifying personnel to carry out composite repairs was too restrictive in some circumstances. Rather than a large number of DASR 145 Maintenance Organisations (MOs) submitting an Alternative Means of Compliance (AltMoC) to DASR 145.A.30(f), DASA undertook a review to determine if amendments to the AMC or guidance may be possible.

Proposed Amendment(s)

4. This NPA proposes the amendment of DASR AMC1 145.A.30(f) to define a list of 'specialised' composite repairs and an acceptable standard to qualify specialist personnel to perform those repairs. For composite repairs that are not considered specialised (all other composite repairs), DASA will not specify an acceptable means of compliance, allowing a DASR 145 MO to define their own competency standard when authorising personnel to perform these composite repairs.

5. Additional guidance for specialised composite repairs is to be included in the DASP Manual Volume 3, Chapter 8 Continuing Airworthiness.

6. The proposed amendments are included in Annexes A and B.

Benefits of proposed changes

7. The benefits of this proposal include:

- a. limiting the need for DASR 145 MOs to submit an Alternative Means of Compliance (AltMoC) to DASR 145.A.30(f); and
- b. allowing DASR 145 MOs to define their own competency standard when authorising personnel to perform composite repairs that are not considered 'specialised'.



Implementation Strategy

8. DASA plans to release the proposed amendment on 27 Feb 25.

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 C.

10. Responses are to be submitted by email to dasa-dcartlregs@defence.gov.au, Hardcopies of the NPA Comment Sheet are not required.

Timing

11. Comments on NPA for DCP 2024 - 015 are to be forwarded to DASA by close of business 09 Nov 24.

Additional Information

12. For additional information concerning this NPA, please contact Mr Stephen Smith <mailto:stephen.smith8@defence.gov.au> or 03 9200 0394

DISPOSITION OF RESPONSES RECEIVED

13. 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

Captain, RAN
Director Continuing Airworthiness
Defence Aviation Safety Authority
Tel: (02) 5109 5415

Oct 24

Annexes:

- A. NPA for DCP 2024 - 015 - Proposed Change to AMC1 145.A.30(f)
- B. NPA for DCP 2024 - 015 - Proposed Changes to DASP Manual Volume 3 Chapter 8
- C. NPA for DCP 2024 - 015 - Response Sheet



Proposed Change to AMC1 145.A.30(f)

Change AMC1 145.30(f):

from:

AMC1 145.A.30(f) - Personnel requirements (AUS)

For the performance of composite repairs, SAE AIR4938 is an accepted standard for qualifying personnel to carry out repairs.

to:

AMC1 145.A.30(f) - Personnel requirements (AUS)

For the purposes of 145.A.30(f), DASA considers the following types of composite repairs to be a specialised task and therefore require qualification IAW officially recognised Standards.

Any repair requiring:

- Metal to metal bonds
- Core replacement
- PrePreg/Foam adhesive
- Step cut
- Scarf cut
- External or Internal wet layup patch

SAE AIR4938 is an officially recognised qualification standard for the conduct of composite specialised tasks.



Proposed Changes to DASP Manual Volume 3 Chapter 8

Change 8.3.2.22 paragraph b from:

8.3.2.22.b DASA considers that any repair involving composite materials which is of greater complexity than a 'resin wipe' is to be considered a composite repair, and a specialised task for the purposes of DASR 145.A.30(f). DASA should be consulted to confirm the complexity, and associated training requirements, of composite repairs for each platform. The complexity and training requirements for standard composite repairs should be detailed in the DASR 145 MOE.

To:

8.3.2.22.b DASA considers that any repair involving composite materials which is of greater complexity than a 'resin wipe' is to be considered a composite repair, and a requiring metal to metal bonds, core replacement, PrePreg/Foam adhesive, step cut, scarf cut, or external or internal wet layup patch, is a specialised task for the purposes of DASR 145.A.30(f). DASA should be consulted to confirm the complexity, and associated training requirements, of composite repairs for each platform. The complexity and training requirements for non-specialised composite repairs should be detailed in the DASR 145 MOE.

Change 8.3.2.34 from:

8.3.2.34 **Recognised Composite Repair Qualification Standards.** The repair of composite structure is considered a specialised task and therefore personnel conducting composite repairs require appropriate qualification in accordance with an officially recognised standard. DASA recognises SAE AIR4938 - Composite and Bonded Structure Technician Specialist Training Document as an officially recognised standard for qualification of personnel who carry out composite repairs (refer AMC1 145.A.30(f)).

To:

8.3.2.34 **Recognised Composite Repair Qualification Standards.** Some types of of composite structure The repair is are considered a specialised task and therefore personnel conducting those types of composite repairs require appropriate qualification in accordance with an officially recognised standard. DASA recognises SAE AIR4938 - Composite and Bonded Structure Technician Specialist Training Document as an officially recognised standard for qualification of personnel who carry out composite repairs (refer AMC1 145.A.30(f)).



Change 8.3.2.36 from:

8.3.2.36 Organisations that wish to use an alternative composite repair personnel qualification standard should apply to DASA with a proposed AltMoC. Organisations should note DASA consider MEA405 an introductory composites course only and therefore DASA does not recognise MEA405 / Cert IV AME Structures as a suitable equivalent to SAE AIR4938 for the conduct of complex composite repairs. The complexity of composite repairs, and associated training requirements will vary for each platform. Where suitable controls can be identified to ensure ongoing airworthiness, a lower standard than SAE AIR4938 may be recognised as suitable for specific circumstances. Such controls could include:

- a. Type of structure being repaired
- b. Type or complexity of composite repair being conducted
- c. Specific nature of training undertaken
- d. Experience of personnel
- e. Supervision requirements
- f. OEM or aircraft type specific training

To:

8.3.2.36 Organisations that wish to use an alternative **to SAE AIR4938 for the qualification of composite repair personnel qualification standard to conduct specialised composite repairs** should apply to DASA with a proposed AltMoC. Organisations should note DASA consider MEA405 an introductory composites course only and therefore DASA does not recognise MEA405 / Cert IV AME Structures as a suitable equivalent to SAE AIR4938 for the conduct of **specialised complex** composite repairs. The complexity of composite repairs, and associated training requirements will vary for each platform. Where suitable controls can be identified to ensure ongoing airworthiness, a lower standard than SAE AIR4938 may be recognised as suitable for specific circumstances. Such controls could include:

- a. Type of structure being repaired
- b. Type or complexity of composite repair being conducted
- c. Specific nature of training undertaken
- d. Experience of personnel
- e. Supervision requirements
- f. OEM or aircraft type specific training

Change 8.3.2.38 from:

8.3.2.38 **Composite Repair Personnel Training.** Prior to authorising staff to perform composite repairs, the DASR 145 MO should ensure that staff are trained in accordance with SAE AIR49385 or approved AltMOC. Composite repair training and certification procedures should be specified in the MOE.

To:

8.3.2.38 **Composite Repair Personnel Training.** Prior to authorising staff to perform composite repairs, the DASR 145 MO should ensure that staff are trained **and qualified** in accordance with **appropriate standards. For specialised composite repairs** SAE AIR49385 or approved AltMOC. Composite repair training and certification procedures **for specialised and non-specialised composite repairs** should be specified in the MOE.



NPA FOR DCP 2024 - 015 Response Sheet

DASA REGULATORY POSITION TO DASR AMC 145.A.30(f) ALTERNATIVE MEANS OF COMPLIANCE

Please forward this sheet as an email attachment to dasa-dcartregs@defence.gov.au by 09 Nov 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"/>]

