



Australian Government  
Department of Defence  
Defence Aviation Safety Authority

Defence Aviation Safety Authority

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# ADVISORY CIRCULAR

**AC 001/2021 v1.2**

## **Certification of On-Aircraft Structural Repairs Interim Arrangements**

BP45008934

V1.2 – December 2024

# CERTIFICATION OF ON-AIRCRAFT STRUCTURAL REPAIRS INTERIM ARRANGEMENTS

An Advisory Circular is issued by the Authority to promulgate important information to the Defence Aviation community, but does not mandate any action. This includes informing the community on aviation safety / airworthiness matters, information that enhances compliance understanding for existing regulation, or policy guidance for aviation issues not yet regulated that requires further understanding.

## Audience

This Advisory Circular (AC) is relevant to:

- This Advisory Circular is issued under the authority vested under Joint Directive 21/2021 and under delegation from the ADF Airworthiness Authority.

## Purpose

This Advisory Circular describes a framework for DASR 145 MO to apply interim arrangements for the certification of on-aircraft structural repairs.

## Scope and Limitations

This AC covers:

- The concept, minimum requirements for issue, and application of interim Military Maintenance Authority (iMMA) for certification of on-aircraft structural repairs.
- DASA requirements for DASR 145 MO interim arrangements governing the authorisation of iMMA holders to issue a CRS (or act as support staff) for on-aircraft structural repairs.
- Additional governance reporting requirements for oversight purposes.

This AC should not be used in any of the following circumstances:

- When a DASR 145 MO has sufficient category B1 MAML holders without E2.5/E2.6 exclusions; or
- For maintenance activities other than on-aircraft structural repairs; or
- For contractor DASR 145 MO, any maintenance activity outside of the scope of their contract with the Commonwealth.

## Further information

For further information on this AC, contact: [DASA.DCA Regs](#)

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**Status**

This AC will remain current until cancelled by DASA.

Version	Date Approved	Approved By	Details
1.0	April 2021	AIRCDRE J. Medved DG DASA	Initial release
1.1	November 2023	AIRCDRE J. Medved DG DASA	Update AltMOC Sunset date
1.2	December 2024	AIRCDRE J. Medved DG DASA	Removal of incorrect references to AltMOC and extension of AC sunset date to allow for transition to new arrangements communicated in separate correspondence

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## 1 Reference material

### 1.1 Acronyms

The acronyms and abbreviations used in this AC are listed in the table below.

Acronym	Description
CRS	Certificate of Release to Service
iMMA	Interim Military Maintenance Authority
MAML	Military Aircraft Maintenance Licence

### 1.2 Definitions

Terms that have specific meaning within this AC are defined in the table below.

Term	Definition
Interim Military Maintenance Authority	A limited (in scope and duration) authorisation issued by DASA that enables DASR 145 MOs, in combination with an approved process, to provide certification authorisation to individuals for on-aircraft structural repairs.

### 1.3 Reference

#### 1.3.1 DASP Manual, Volume 3, Section 8.3.3 *Certification of Maintenance*

Unless specified otherwise, all regulation references in this AC refer to the Defence Aviation Safety Regulation (DASR).

### 1.4 Responsibilities

#### 1.4.1 **DASR 145 MOs** are responsible for:

1.4.1.1 Submitting applications for iMMA for staff that meet the requirements, and

1.4.1.2 Developing and implementing processes approved by DASA.

#### 1.4.2 **DASA** is responsible for:

1.4.2.1 Issuing iMMA, and

1.4.2.2 Approving DASR 145 MO's processes.

## 2 Introduction

### 2.1 Background

- 2.1.1 A MAML coverage gap exists for some DASR 145 MOs when certifying on-aircraft structural repairs. Many ADF category B1 MAML holders have minor structural repair exclusions on their licence. The MAML coverage gap for on-aircraft structural repairs became apparent in 2020 during the development of NPA 01/2020 and AC 005/2020 (now Reference 1.3.1), which clarified that certification of maintenance occurs when issuing a CRS.
- 2.1.2 A category B1 MAML holder may only issue a CRS (or act as support staff) within the scope of their licence – specifically they cannot issue a CRS (or act as support staff) if their licence has an exclusion for that work.
- 2.1.3 A category B1 MAML holder who has minor structural repair privileges (exclusion removed), may be authorised to issue a CRS (or act as support staff) for both minor and major on-aircraft structural repairs<sup>1</sup>. Note: privileges for minor structural repairs are granted separately for pressurised aircraft and unpressurised aircraft, but privileges for pressurised aircraft extend automatically to unpressurised aircraft.

### 2.2 Remediation

- 2.2.1 The end-state for addressing the MAML coverage gap for on-aircraft structural repairs requires either:
  - 2.2.1.1 removing the relevant minor structural repair exclusion from category B1 MAML holders, or
  - 2.2.1.2 achieving any required competencies and relevant type rating for ADF Aircraft Structural Technicians to gain and use a category B1 MAML

### 2.3 Interim Arrangements

- 2.3.1 DASR 145 MOs can apply for interim arrangements to DASR 145.A.30 and 145.A.35, in order to authorise selected personnel to issue CRS (or act as support staff) for on-aircraft structural repairs.
- 2.3.2 To support the DASR 145 interim arrangements, and to provide additional assurance, DASA will issue an interim Military Maintenance Authority (iMMA) to individuals, who meet minimum requirements.

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<sup>1</sup> DASA is currently amending the DASA MAML Exclusions, Inclusions and Endorsements Manual to reflect this.

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- 2.3.3 DASA considers the issue of iMMA to be similar in nature to a MAML scope change and therefore subject to the flexibility requirements of AMC to DASR 145.A.35(b).

### 2.4 Implementation.

- 2.4.1 Interim arrangements should be an addition or variation to the existing maintenance management system described in the DASR 145 MOEs.
- 2.4.2 The interim arrangements proposed by DASR 145 MOs must ensure that, in the absence of personnel with relevant MAML privileges, only individuals that hold iMMA are authorised to issue CRS (or act as support staff) for on-aircraft structural repairs.
- 2.4.3 DASR 145 MOs will be required to ensure that the authorisation of iMMA holders, to issue CRS (or act as support staff), minimises risk SFARP. This must consider the iMMA holder's shortfalls in aircraft type rating and ensure any aircraft system affected, impacted or disturbed during the conduct of the on-aircraft structural repair has been identified and recorded.

### 2.5 Approvals and Authorisations

#### Note

*HQAC A9 is sponsoring approved interim arrangements for Air Command DASR 145 MOs to use (and others to consider) in order to comply with the AC requirements. DASR 145 MOs that adopt the approved HQAC A9 interim arrangements will only be required to notify their respective DASA continuing airworthiness desk officer once the approved HQAC A9 interim arrangement is in use (separate interim arrangement re-approval in this instance is not required)*

- 2.5.1 Applicants should use the form at Enclosure 1 to apply for iMMA.
- 2.5.2 Competency requirements for iMMA are detailed at Enclosure 2.

#### Note

*DASR 145 MOs should prioritise iMMA applications based on actual operational need, to allow all DASR 145 MOs fair and equal access to obtain timely iMMA authorisations from DASA.*

- 2.5.3 DASA will issue an iMMA to approved applicants. These should be managed as maintenance organisation personnel records.

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**2.6 Reporting Requirements**

- 2.6.1 Maintenance organisations are required to report any maintenance incidents or issues arising from the use of interim arrangements related to this AC. This must be reported as soon as practical directly to their designated DASA desk officer.

**2.7 Extension of AC 001/2021**

- 2.7.1 This AC has been extended to 01 Jul 25, to allow time for DASR 145 MOs to transition to new arrangements for certification of on-aircraft structural repairs that have been detailed in separate correspondence.

**2.8 AC Sunset**

- 2.8.1 This AC remains in force until 01 Jul 25, at which time it will be cancelled and all iMMA will be revoked.

**Enclosures:**

1. Application for iMMA
2. Minimum Requirements for iMMA