



Australian Government
Department of Defence
Defence Aviation Safety Authority



Defence Aviation Safety Authority

Capability First, Safety Always

ADVISORY CIRCULAR

AC 001/2026 v1.0

DASR SMS Transition and Change Management Arrangements

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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:

- Approved Organisations required to comply with *DASR SMS*
- Design Organisations (DASR 21J)
- Production Organisations (DASR 21G)
- Military Type Certificate Holder Organisations (DASR 21C)
- Continuing Airworthiness Management Organisations (DASR M)
- Maintenance Organisations (DASR 145)
- Military Air Operators (MAOs - DASR ARO.100)
- Aerodrome Operators (DASR 139)
- Air Navigation Service Providers (DASR ANSP)
- Air Cargo Delivery Service Providers (DASR ACD)
- Uncrewed Aircraft System operators (DASR UAS)

Purpose

The purpose of this Advisory Circular (AC) is to inform the safety community of transitional arrangements relating to *DASR SMS* (Feb 26 release).

Further information

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Status

This AC will remain current until cancelled by DASA.

Version	Date Approved	Approved By	Details
1.0	Mar 2026	GPCAPT Nicholas Pausina DAVNOPS	Initial release

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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
AC	Advisory Circular
AM	Accountable Manager
AMC	Acceptable Means of Compliance
ASIR	Aviation Safety Investigation Report
DASM	Defence Aviation Safety Manual
DASPMAN	Defence Aviation Safety Program Manual
DASR	Defence Aviation Safety Regulation
GM	Guidance Material
SMS	Safety Management System

1.2 Definitions

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

Term	Definition
Nil	

1.3 References

- 1.3.1 Defence Flight Safety Bureau (DfSB) Aviation Safety Investigation Report (ASIR): *6th Aviation regiment – NHIndustries MRH-90 Taipan A40-040, Spatial Disorientation leading to Controlled Flight Into terrain (CFIT), Whitsunday Islands, QLD, 28 July 2023 (BP44206784)*
- 1.3.2 *Defence Aviation Safety Manual* Ed 3 AL1, of 01 Apr 2024
- 1.3.3 *DASA AC 003/2018 Risk Management in the Defence Aviation Safety Program*, of 24 Sep 2018

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

2 Introduction

2.1 Overview

- 2.1.1 This AC describes changes in *DASR SMS* transition arrangements for approved organisations subject to DASR SMS.
- 2.1.2 The *DASR SMS* update satisfies DASA's requirement to provide approved organisations with effective SMS regulation and policy, enabling Accountable Managers to meet their WHS Act 2011 (Commonwealth) obligations in the Defence Aviation context.
- 2.1.3 At completion of the *DASR SMS* transition period DASA will cancel this Advisory Circular.

2.2 *DASR SMS* compliance requirements

- 2.2.1 DASA will require approved organisations to demonstrate compliance to new *DASR SMS* requirements by the end of the transition period. Mechanisms to do this will be discussed by DASA Desk Officers during transition period consultation, and may require Accountable Manager (AM) compliance attestations dependent on extant domain DASR requirements.¹
- 2.2.2 Approved organisations should remain compliant to the previous version of *DASR SMS* until they have gained DASA agreement to transition to the new *DASR SMS*. A copy of the previous *DASR SMS*, as well as relevant excerpts from *DASR 21, M & 145*, are provided at Annex A.

2.3 Purpose of Transition and Change Management Plan

- 2.3.1 The purpose of the attached *DASR SMS* Transition and Change Management Plan is to inform the Defence Aviation Safety Community (hereafter simply called 'safety community') of likely transitional considerations that will need contextualisation in each organisation. In particular, the plan provides considerations for:
- transition schedule
 - organisational design, accountabilities and responsibilities
 - training, mentoring and communication

¹ From the referenced MRH-90 ASIR, which identifies regulatory transitional arrangements as an area for improvement. Specifically, processes used by organisations transitioning to new or updated regulations.

- policy, plans and process changes
- compliance, conformance and performance systems.

2.4 Complementary publication and hyperlink changes

- 2.4.1 DASA will withdraw the *DASM* and DASA AC 003/2018 *Risk Management* in February 2027, to coincide with the date all organisations will need be compliant with the new *DASR SMS* (Feb 2026 release). Accordingly, DASA has transferred, or will transfer, material from the extant *DASM* and AC 003/2018 to *DASR SMS* regulation, AMC, GM and DASA web pages as appropriate before this date.
- 2.4.2 The DASA SMS web site is undergoing complementary changes during the new *DASR SMS* (Feb 2026 release) transition period. This will likely result in changes to the web address of extant specific content. Accordingly, DASA advises organisation's web links should only point to the DASA SMS web page (<https://dasa.defence.gov.au/safety-management-systems>).

2.5 DASA support to the safety community

- 2.5.1 The [DASP Policy and Guidance Portal](#) hosts the updated *DASR SMS* (Feb 2026 release) with supporting guidance material in [DASP Manual, Volume 3 - Chapter 14](#).
- 2.5.2 The previous version of *DASR SMS* regulation, AMC and GM and excerpts from *DASR 145* and *DASR M* are located at Annexes A and B.
- 2.5.3 *DASR SMS* Transition and Change Management Plan is located at Enclosure 1.
- 2.5.4 *DASM-to-DASPMAN* Volume 2 and 3 cross-reference matrix for the new *DASR SMS* (Feb 2026 release) is located on the [DASA SMS Website](#). The cross-reference matrix is a 'live' document, which will continue to undergo updates during the transition period.

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Annexes

- A. Previous version of *DASR SMS* regulation, AMC, and GM
- B. Excerpts from *DASR 145* & *DASR M*

Enclosures

1. *DASR SMS* Transition and Change Management Plan.

Annex A: Previous version of *DASR SMS* regulation, **AMC**, and **GM**

SMS.A.10 - Scope (AUS)

- a. This section specifies Safety Management System (SMS) requirements that must be met by an organisation to qualify for the issue or continuation of an approval. This section only applies to organisations where the DASR SMS is listed as a requirement from the relevant section of the DASR.

SMS.A.25 - Safety Management System (AUS)

- a. The approved organisation shall establish and maintain a Safety Management System (SMS). The SMS of the approved organisation shall: AMC

AMC SMS 25(a) - The Defence Aviation Safety Manual

1. Compliance with Defence's corporate aviation Safety Management System (SMS) solution, the Defence Aviation Safety Manual (DASM), currently satisfies the SMS requirements for the issue of an MAOC. Those entities subject to the DASR.SMS regulations and currently assessed against the DASM, are to continue using the Aviation Safety Management System (ASMS) prescribed in the DASM, while it continues to evolve as a corporate SMS solution that incorporates all DASR.SMS elements.

1. be established in accordance with the 4 components and 12 elements contained in paragraph (b);
2. be commensurate with the size of the organisation and the complexity of its aviation products and/or services; **GM** and

GM SMS.A.25(a)(2) - Size and complexity considerations (AUS)

1. Every organisation should ensure that its SMS is tailored for its size, the nature of its operations and the complexity of its aviation products and services. There is no 'one size fits all' SMS.
2. Larger or more diverse organisations may require several safety management levels and/or safety committees. Conversely, small organisations may not need dedicated safety staff, instead relying on a number of employees to perform the multiple functions required. In very small organisations, maintaining independence in safety oversight and improvement functions may not be possible, in which case these functions could be conducted by external parties with the required competencies.

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3. Where one or more organisations exist within a larger business group, each organisation may leverage off a single, corporate-level SMS.

3. be maintained with a maturity level that is acceptable to the Authority. GM

GM SMS.A.25(a)3 - Safety management system maturity level (AUS)

1. Variations in the size of the organisation, the nature of its operations and the complexity of its aviation products and services make it necessary to assess organisations on the 'performance' of their SMS rather than their 'compliance' and 'conformance'. These performance assessments primarily focus on the effectiveness of the SMS and its maturity growth.
2. Assessment against the indicators that are contained within the published SMS assessment tool is used to determine the maturity of the organisation. Further information on the maturity and growth expectations can be found at DASA ASMS website.

b. The approved organisation's SMS shall comprise of, or map to, the following 4 components and 12 SMS elements:

1. SAFETY POLICY AND OBJECTIVES:

1.1 Management commitment [AMC GM](#)

GM SMS.A.25(b)(1)(1.1) - Management commitment (AUS)

Safety Policy

1. In preparing a safety policy, the accountable manager should consult widely with staff members in charge of key safety areas. Consultation ensures that the document is relevant to staff and provides them with a sense of ownership in it.

Unacceptable behaviours

2. Human error is unavoidable and must be managed. Just culture refers to the way that both errors and violations are treated. For a just culture to exist, it must be collectively agreed and clearly understood as to the distinction between acceptable and unacceptable behaviour. All personnel must understand the difference between intentional departures from the rules and honest errors. To ensure the fair treatment of persons involved, it is essential that those responsible for making determinations have the necessary technical expertise so that the context of the event may be fully considered. To maintain an effective, just and fair reporting culture, the organisation should consider utilising a standardised/documented tool such as the DFSB developed Safety Behaviour Management Tool (SBMT).

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Visible endorsement

3. 'Visible endorsement' refers to making management's active support of the safety policy visible to the rest of the organisation. This can be done via any means of communication and also through the alignment of activities to the safety policy statement.
4. If the organisation chooses to make use of a 'safety policy statement' as its safety policy, visible endorsement could be demonstrated through attaching an annual safety schedule to the safety policy statement.

Safety objectives

5. Organisations should also consider the following suggestions when establishing their safety objectives:
 - a. Choose a variety of objectives that when combined encompass all of the components (policy and objectives, risk management, oversight & improvement and promotion) of the DASR SMS.
 - b. Write objectives in a SMART format (specific, measureable, achievable, relevant and timely), or support them with SMART safety targets. This will assist in demonstrating progress towards achieving the objectives.
 - c. If the organisation chooses to make use of a 'safety policy statement' as its safety policy, the safety objectives could be included as an attachment to the statement.

AMC SMS.A.25(b)(1)(1.1) - Management commitment (AUS)

1. The organisation must define its safety policy and safety objectives. In doing this, the organisation must be able to demonstrate the following:
 - a. There is a safety policy that:
 - i. reflects organisational commitment regarding safety, including the promotion of a positive safety culture
 - ii. includes a clear statement about the provision of the necessary resources for the implementation of the safety policy;
 - iii. includes safety reporting procedures;
 - iv. clearly indicates which types of behaviours are unacceptable related to the organisation's aviation activities and includes the circumstances under which disciplinary action would not apply;
 - v. is signed by the accountable manager of the organisation; and
 - vi. is periodically reviewed to ensure it remains relevant and appropriate to the service provider.
 - b. Taking due account of its safety policy, the organisation has defined its safety objectives that:

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- i. form the basis for safety performance monitoring and measurement as required by element 3.1;
 - ii. reflect the organisation's commitment to maintain or continuously improve the overall effectiveness of the SMS;
 - iii. are communicated throughout the organisation; and
 - iv. are periodically reviewed to ensure they remain relevant and appropriate for the organisation.
- c. The Accountable Manager and key safety management personnel promote and demonstrate their commitment to their safety policy and safety objectives through active and visible participation in the SMS.

1.2 Safety accountability and responsibilities [AMC GM](#)

GM SMS.A.25(b)(1)(1.2) - Safety accountability and responsibilities (AUS)

SAFETY ACCOUNTABILITY AND RESPONSIBILITIES

Accountable Manager

1. In the context of this regulation the term 'accountability' refers to obligations which cannot be delegated. The term 'responsibilities' refers to functions and activities which may be delegated.
2. The accountable manager is the person who is accountable for the safe operation of the organisation on behalf of the organisation. The Accountable Manager is typically the Chief Executive Officer (CEO) or senior military commander who:
 - a. has the authority to make decisions on behalf of the organisation;
 - b. has control of resources, both financial and human; and
 - c. is responsible for ensuring appropriate actions are taken to respond to accidents and incidents, address safety issues and address safety risks.
3. In the case where a SMS applies to several different approvals, that are all part of the same organisation, there should be a single accountable manager. Where this is not possible, individual accountable managers should be identified for each organisation approval with clearly defined lines of accountability. It is also important to identify how their safety accountabilities will be coordinated.
4. Although responsibility for the day-to-day operation of the SMS is typically managed by other key safety personnel, the accountable manager cannot delegate accountability for the system, nor can accountability of the decisions regarding safety risks be delegated (the authority to make decisions regarding safety risk may be assigned to individuals, management positions, ranks or committees).

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Organisational safety structure

5. The responsibilities of all personnel with safety-related duties should be clearly defined through the organisation's safety structure. The organisation's safety structure should:
 - a. Define the responsibilities of all personnel involved in the management and operation of the SMS. The responsibilities should be commensurate with the extent to which the personnel are involved with and utilise the SMS.
 - b. Contain clear lines of communication and safety responsibility so that personnel can locate their superiors and subordinates in the safety structure.
 - c. Be clearly written, in a format that is understandable and easily accessible to all personnel.
 - d. Focus on the staff member's contribution to the safety performance of the organisation (the organisation's safety outcomes).

Safety risk decisions

6. An organisation ensures that decisions carrying significant potential consequences are made at an appropriate level by establishing levels of management that have the authority to make decisions regarding safety risk. Authority may be assigned to individuals, management positions, ranks or committees.
7. Decisions regarding safety risk are business decisions, aimed at ensuring that activities with residual risk are not conducted without approval from the appropriate level of management. All activities that are conducted are still required to have safety risks eliminated, So Far As is Reasonably Practicable (SFARP), and where not reasonably practicable to eliminate, minimised SFARP. That is, a predetermined level of safety risk must not influence the risk management process to cease the elimination and minimisation of risks prematurely.

AMC SMS.A.25(b)(1)(1.2) - Safety accountability and responsibilities (AUS)

1. The organisation must appoint an Accountable Manager and develop an organisational safety structure with clearly defined lines of safety accountability and responsibilities. As part of this structure, the organisation must be able to demonstrate the following:
 - a. An accountable manager has been identified who is accountable on behalf of the organisation for the implementation and maintenance of an effective SMS.

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- b. Lines of safety accountability have been clearly defined throughout the organisation, including a direct accountability for safety on the part of senior management.
- c. Responsibilities have been identified for all personnel with respect to the safety performance of the organisation.
- d. Levels of management with the authority to make decisions regarding safety risk have been defined.
- e. Safety accountability, responsibilities and authorities have been documented and communicated throughout the organisation.

1.3 Appointment of key safety personnel **AMC GM**

GM SMS.A.25(b)(1)(1.3) - Appointment of key safety personnel (AUS)

APPOINTMENT OF KEY SAFETY PERSONNEL

The safety manager function

1. Appointment of a competent individual or group to fulfil the safety manager function is essential to an effectively implemented and functioning SMS. The individual or persons filling the function of safety manager advise the accountable manager and line managers on safety management matters, and are responsible for coordinating and communicating safety issues within the organisation. Safety manager functions and responsibilities may include:
 - a. manage the SMS implementation plan on behalf of the accountable manager (upon initial implementation);
 - b. perform/facilitate hazard identification and safety risk analysis;
 - c. monitor corrective actions and evaluate their results;
 - d. provide periodic reports on the organisation's safety performance;
 - e. maintain SMS documentation and records;
 - f. plan and facilitate staff safety training;
 - g. provide independent advice on safety matters;
 - h. monitor safety concerns in the aviation industry and their perceived impact on the organisation's operations aimed at product and service delivery; and
 - i. coordinate and communicate (on behalf of the accountable manager) with the Authority and CASA as necessary on issues relating to safety.

AMC SMS.A.25(b)(1)(1.3) - Appointment of safety personnel (AUS)

1. The organisation must allocate responsibilities to key safety personnel for the implementation and maintenance of the SMS. Depending on the size of the organisation and the complexity of its aviation products or services, the key safety personnel may be an individual or a group within the

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organisation. As part of this, the organisation must be able to demonstrate the following:

- a. A competent individual or group with the appropriate knowledge, skills and experience has been nominated to manage the operation of the SMS and fulfils the required job functions and responsibilities.
- b. There is a direct reporting line between the Safety Manager and the Accountable Manager, and the Accountable Manager and other key safety personnel are made aware of agreed safety information.
- c. The organisation has allocated sufficient resources to manage the SMS including human resources for safety investigation, analysis, auditing and promotion, and personnel in key safety roles are kept trained and current.

1.4 Coordination of emergency response planning **AMC GM**

GM SMS.A.25(b)(1)(1.4) - Coordination of emergency response planning (AUS)

COORDINATION OF EMERGENCY RESPONSE PLANNING

Applicability

1. The DASR SMS requirement for emergency response planning applies to all emergency situations/scenarios that could affect the safety of aviation products or services. Although it may seem indirect, poor emergency response in manufacturing and maintenance organisations could introduce latent hazards in aviation systems.
2. An ERP may not be relevant to all organisations. Currently all DASR 21J organisations are exempt from the need to have an ERP to handle aviation-related emergencies.

The Emergency Response Plan

3. An emergency response plan (ERP) is an integral component of an organisation's safety risk management process to address aviation related emergencies, crises or events. The ERP should:
 - a. address reasonably foreseeable aviation-related emergencies;
 - b. ensure an orderly and efficient transition from normal to emergency operations;
 - c. aim to re-establish 'normal' operations following the emergency (this includes all of the checks/inspections that are to be conducted prior to resuming work);
 - d. provide a selection of standard mitigating actions, processes and control measures;
 - e. assign appropriate personnel with emergency responsibilities and delegation(s) of authority;

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- f. provide actions to be taken by responsible personnel during an emergency;
- g. contain coordinated actions with different organisations, eg airfield management services and external, non-aviation, emergency services; and
- h. be easily accessible to the appropriate key personnel and the coordinating external organisations.

AMC SMS.A.25(b)(1)(1.4) - Coordination of emergency response planning (AUS)

1. The organisation must, if required, establish and maintain an emergency response plan for accidents and incidents in aircraft operations and other aviation emergencies. As part of this plan the organisation must be able to demonstrate the following:
 - a. An Emergency Response Plan (ERP) that reflects the size, nature and complexity of the operation has been developed, defining the procedures, roles, responsibilities and actions of the various organisation's and key personnel, and is periodically tested.
 - b. The organisation has a process to inform all personnel of the ERP requirements, and all personnel are aware of their responsibilities.

NOTE: An ERP may not be relevant to all organisations. Currently all DASR 21J organisations are exempt from the need to have an ERP to handle aviation-related emergencies.

1.5 SMS documentation [AMC GM](#)

GM SMS.A.25(b)(1)(1.5) - SMS documentation (AUS)

SMS documentation

1. The SMS documentation should describe the organisation's SMS policies, processes and procedures to facilitate the organisation's internal administration, communication and maintenance of the SMS. SMS documentation should:
 - a. help personnel to understand how the organisation's SMS functions;
 - b. describe how the safety policy and objectives will be met;
 - c. include a system description that provides the boundaries of the SMS;
 - d. help clarify the relationship between the various policies, processes, procedures and practices, and define how these link to the organisation's safety policy statement and objectives;
 - e. be written to address the day-to-day safety management activities of the organisation;

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- f. be easily understood by personnel throughout the organisation;
 - g. be kept up to date; and
 - h. provide appropriate cross-referencing to other relevant documentation.
2. SMS documentation may be a stand-alone document, or it may be integrated with other documents maintained by the organisation. Where details of the organisation's SMS processes are already addressed in existing documents, appropriate cross-referencing to such documents (demonstrating compliance with the 4 components and 12 elements) may be considered sufficient.

AMC SMS.A.25(b)(1)(1.5) - SMS documentation (AUS)

1. The organisation must produce and maintain its Safety Management System (SMS) documentation in a way that is accessible and useable to all relevant personnel. As part of this process the organisation must be able to demonstrate the following:
 - a. There is documentation that describes the SMS and the interrelationships between all of its elements, and it is readily available to all personnel.
 - b. SMS documentation is regularly reviewed and updated with appropriate version control in place.
 - c. The SMS documentation describes the means for the storage of SMS related records.

2. SAFETY RISK MANAGEMENT:

2.1 Hazard identification [AMC GM](#)

GM SMS.A.25(b)(2)(2.1) - Hazard identification (AUS)

HAZARD IDENTIFICATION

Introduction

1. Organisations must develop and maintain a formal process to identify hazards that could impact aviation safety in all areas of operations and activities. This includes hazards that may be introduced through the use of plant, substances, structures and any goods or services provided by external organisations.

Common sources for hazard identification

2. There are a variety of sources for hazard identification, some internal to the organisation and some external to the organisation. Sources of hazard identification include:
 - a. daily monitoring of normal operations,
 - b. automated monitoring systems,
 - c. voluntary and mandatory safety reporting systems,

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- d. surveys and audits,
- e. feedback from training,
- f. internal and external safety investigations,
- g. interfaces with external organisations (3rd party relationships and interactions),
- h. aviation accident reports,
- i. safety publications and notifications produced by aviation safety authorities, and
- j. WHS legislation (Act, Regulations and Codes of practice).

Safety reporting system

3. A safety reporting system is a major source for ongoing hazard identification, regularly raising potential safety issues such as those found in accidents, incidents, near misses or errors. It can provide valuable information to the Authority and the organisation on lower consequence events.
4. The Defence corporate solution for a safety reporting system is now 'Sentinel'. The organisation should contact the Defence Flight Safety Bureau (DFSB) for assistance and information regarding its function and use.
5. It is important that organisations provide appropriate protections to encourage people to report what they see or experience. It should be clearly stated that reported information will be used primarily to support the enhancement of safety. The intent is to promote an effective reporting culture and proactive identification of potential safety deficiencies.
6. Voluntary safety reporting systems should be confidential, requiring that any identifying information about the reporter is known only to the custodian to allow for follow-up action. The role of custodian should be kept to a few individuals, typically restricted to the safety manager and personnel involved in the safety investigation. Maintaining confidentiality will help facilitate the disclosure of hazards leading to human error, without fear of retribution or embarrassment. Voluntary safety reports may be de-identified and archived once necessary follow-up actions are taken. De-identified reports can support future trending analyses to track the effectiveness of risk mitigation and to identify emerging hazards.
7. To be effective, safety reporting systems should be readily accessible to all personnel. Depending on the situation, a paper-based, web-based or desktop form can be used. Having multiple entry methods available maximises the likelihood of staff engagement. Everyone should be made aware of the benefits of safety reporting and what should be reported

Feedback to the reporter

8. Anybody that submits a safety report should receive feedback on what decisions or actions have been taken. Feedback to reporters in voluntary reporting schemes serves to demonstrate that such reports are considered seriously. This helps to promote a positive safety culture and encourage future reporting.

SAFETY INVESTIGATIONS

When to conduct a safety investigation?

9. The organisation must establish, implement and maintain procedures for:
 - a. Investigating, responding to, and taking action to minimise any harm caused by accidents and incidents;
 - b. investigating and responding to system failures; and
 - c. initiating and completing appropriate corrective and preventive action.
10. In addition to accidents and incidents, there are other conditions that may merit more detailed investigation, eg where the organisation experiences an unexplained increase in aviation safety-related events or regulatory non-compliance. Any additional conditions that may require a safety investigation are to be identified in the organisation's SMS documentation.
11. The organisation must implement and record any changes in SMS documentation and procedures that result from safety investigations and their corrective and preventive actions.

The safety investigation process

12. Providing in-depth detail of the process for conducting safety investigations is outside of the scope of this guidance material. Further information regarding the conduct and application of safety investigations can be obtained through contacting the Defence Flight Safety Bureau (DFSFB) and consulting their associated publications.
13. In establishing and maintaining procedures for safety investigations the organisation should include these basic elements:
 - a. identifying the causal and contributing factors for the incident(s) or hazard(s);
 - b. identifying and implementing the necessary corrective action(s);
 - c. implementing or modifying control measures that are necessary to avoid occurrence or repetition of the incident/situation; and
 - d. recording any changes in SMS documentation and procedures resulting from the safety investigation and its corrective and preventative actions.

Safety investigation training

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14. Safety investigations, and the resultant reports, are to be conducted by staff with, or supervised by staff with, relevant safety investigation or incident investigation training. The suitability of safety investigators will be assessed on a case-by-case basis, taking into account the size of the organisation, the nature of its operations and the complexity of its aviation products and services.
15. Although there are no specific training courses required by the DASR SMS for safety investigators, organisations may choose to utilise the Aviation Incident Investigation Course (AIIIC) provided by the Defence Flight Safety Bureau (DFSFB).

Third party relationships and interactions

16. Third party relationships and interactions previously existed as a separate element (1.4.) of the DASR SMS. The decision was made to align more closely with ICAO and incorporate its requirements into the safety risk management component. This change does not mean that the treatment of third party hazards and risks is to be forgotten in any way. Hazards and risks associated with interactions with third parties are still to be identified and treated using the process outlined in element 2.1. and 2.2.

AMC SMS.A.25(b)(2)(2.1) - Hazard identification (AUS)

1. The organisation must develop and maintain a process to identify hazards associated with its aviation operations, products or services. As part of this process the organisation must be able to demonstrate the following:
 - a. The organisation, in managing risks to health and safety, has identified reasonably foreseeable hazards that could give rise to risks to health and safety.
 - b. Hazard identification is an ongoing process, involving key personnel and appropriate stakeholders.
 - c. Identified hazards are documented, reviewed regularly and kept available for future reference.
 - d. The organisation has a reporting system that:
 - i. can be used to identify hazards from a variety of sources;
 - ii. is simple to use;
 - iii. is accessible to all personnel;
 - iv. provides feedback to the reporter (and where appropriate the rest of the organisation) of any actions taken or not taken; and
 - v. has the confidence and trust of the organisation's personnel.
 - e. The organisation conducts safety investigations that:
 - i. are conducted by personnel with investigation training or who are supervised by personnel with investigation training;

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- ii. establish causal and contributing factors;
- iii. identify underlying potential hazards for existing and future operations; and
- iv. produces investigation reports completed by personnel with investigation training.

2.2 Safety risk assessment and mitigation [AMC GM](#)

GM SMS.A.25(b)(2)(2.2) - Safety risk assessment and mitigation (AUS)

1. The Work Health and Safety Act 2011 and Work Health and Safety Regulations 2011 outline a number of specific requirements relating to the management of risks to health and safety. Although these requirements can be easily understood when read in isolation, the final risk management process can become complicated due to the interactions between them.
2. For example, the reasonably practicable requirements must be applied up to 4 times in the execution of managing risks due to the structure and use of the hierarchy of control measures being applied during minimisation. This makes for a non-linear process that will vary in difficulty depending on the context.
3. To provide direction on the application of the WHS legislated requirements, Defence has produced a 7 step Safety Risk Management (SRM) process, incorporating the 5 requirements outlined in the AMC:
 - Step 1.** Establish hazard and risk context.
 - Step 2.** Be reasonably informed of the risk and all possible controls.
 - Step 3.** Eliminate risk so far as is reasonably practicable (SFARP).
 - Step 4.** Minimise risk SFARP.
 - Step 5.** Characterise risk.
 - Step 6.** Decision to proceed.
 - Step 7.** Continuous risk monitoring and review.

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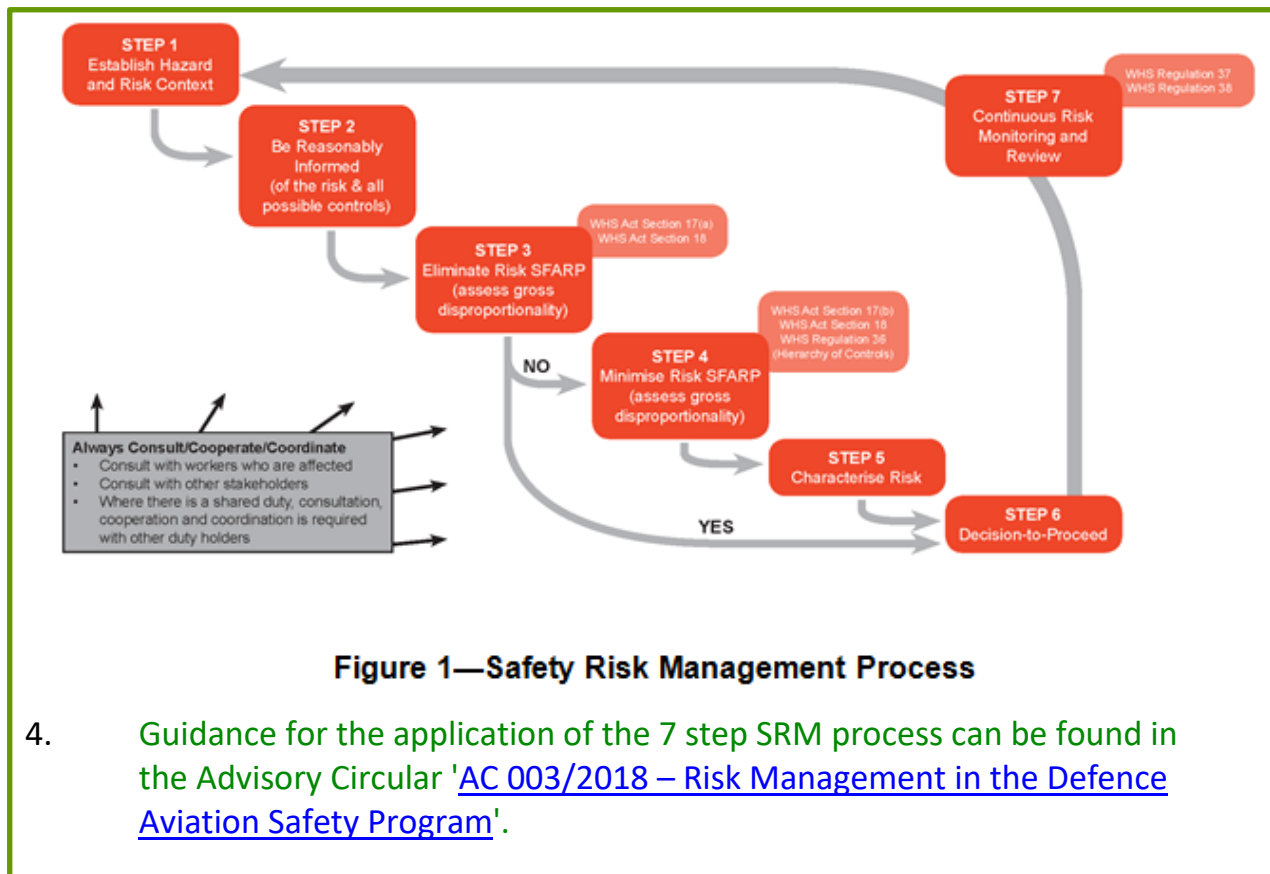


Figure 1—Safety Risk Management Process

4. Guidance for the application of the 7 step SRM process can be found in the Advisory Circular '[AC 003/2018 – Risk Management in the Defence Aviation Safety Program](#)'.

AMC SMS.A.25(b)(2)(2.2) - Safety risk assessment and mitigation (AUS)

INTRODUCTION

1. Risks to health and safety must be managed in accordance with the requirements contained within the Work Health and Safety Act 2011 and the Work Health and Safety Regulations 2011. The requirements of WHS legislation are not optional and should be strictly adhered to by all organisations for the management of all safety risks including aviation safety risks.
2. The parts of WHS legislation that relate to the management of risks to health and safety are relatively few and simple enough to understand. These requirements apply to all persons at the workplace as well as to all decisions that may carry a safety risk.
3. The requirements listed below, reflect the requirements of WHS legislation and should be applied after the identification of reasonably foreseeable hazards as outlined in the AMC for element 2.1. 'Hazard Identification'.

1 – THE MANAGEMENT OF RISKS¹

Sourced from section 17 of the Work Health and Safety Act 2011

4. A duty imposed on a person to ensure health and safety requires the person:

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- a. to eliminate risks to health and safety, so far as is reasonably practicable; and
- b. if it is not reasonably practicable to eliminate risks to health and safety, to minimise those risks so far as is reasonably practicable.

2 – UNDERSTANDING AND APPLYING THE CONCEPT OF REASONABLY PRACTICABLE²

Sourced from section 18 of the Work Health and Safety Act 2011

5. Reasonably practicable, in relation to a duty to ensure health and safety, means that which is, or was at a particular time, reasonably able to be done in relation to ensuring health and safety, taking into account and weighing up all relevant matters including:
 - a. the likelihood of the hazard or the risk concerned occurring; and
 - b. the degree of harm that might result from the hazard or the risk; and
 - c. what the person concerned knows, or ought reasonably to know, about:
 - i. the hazard or the risk; and
 - ii. ways of eliminating or minimising the risk; and
 - d. the availability and suitability of ways to eliminate or minimise the risk; and
 - e. after assessing the extent of the risk and the available ways of eliminating or minimising the risk, the cost associated with available ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.

3 – HIERARCHY OF CONTROL MEASURES³

Sourced from regulation 36 of the Work Health and Safety Regulations 2011

6. This regulation applies if it is not reasonably practicable for a duty holder to eliminate risks to health and safety.
7. A duty holder, in minimising risks to health and safety, must implement risk control measures in accordance with this regulation.
8. The duty holder must minimise risks, so far as is reasonably practicable, by doing 1 or more of the following:
 - a. substituting (wholly or partly) the hazard giving rise to the risk with something that gives rise to a lesser risk;
 - b. isolating the hazard from any person exposed to it;
 - c. implementing engineering controls.
9. If a risk then remains, the duty holder must minimise the remaining risk, so far as is reasonably practicable, by implementing administrative controls.

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10. If a risk then remains, the duty holder must minimise the remaining risk, so far as is reasonably practicable, by ensuring the provision and use of suitable personal protective equipment.

NOTE: A combination of the controls set out in this requirement may be used to minimise risks, so far as is reasonably practicable, if a single control is not sufficient for the purpose.

4 – MAINTENANCE OF CONTROL MEASURES⁴

Sourced from regulation 37 of the Work Health and Safety Regulations 2011

11. A duty holder who implements a control measure to eliminate or minimise risks to health and safety must ensure that the control measure is, and is maintained so that it remains, effective, including by ensuring that the control measure is and remains:
- a. fit for purpose; and
 - b. suitable for the nature and duration of the work; and
 - c. installed, set up and used correctly.

5 – REVIEW OF CONTROL MEASURES⁵

Sourced from regulation 38 of the Work Health and Safety Regulations 2011

12. A duty holder must review and as necessary revise control measures implemented under these requirements so as to maintain, so far as is reasonably practicable, a work environment that is without risks to health or safety.
13. Without limiting the intent of paragraph 12, the duty holder must review and as necessary revise a control measure in the following circumstances:
- a. The control measure does not control the risk it was implemented to control so far as is reasonably practicable (e.g. monitoring shows that the control measure does not control the risk or a notifiable incident has occurred because of the risk);
 - b. Before a change at the workplace (e.g. changes to the work environment, system of work, a process or procedure) that is likely to give rise to a new or different risk to health or safety that the measure may not effectively control;
 - c. A new relevant hazard or risk is identified;
 - d. The results of consultation by the duty holder indicate that a review is necessary
 - e. A health and safety representative requests a review because they reasonably believe that:
 - i. A circumstance referred to in (a), (b), (c) or (d) of this paragraph affects or may affect the health and safety of a member of the work group represented by the health and safety representative; and

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- ii. The duty holder has not adequately reviewed the control measure in response to the circumstance.

3. **SAFETY OVERSIGHT and IMPROVEMENT: (see NOTE 1 below)**

3.1 Safety performance monitoring and measurement **AMC GM**

GM SMS.A.25(b)(3)(3.1) - Safety performance monitoring and measurement (AUS)

SAFETY PERFORMANCE OBJECTIVES, TARGETS AND INDICATORS

1. Safety performance monitoring is conducted through the collection of safety data and safety information from a variety of sources typically available to an organisation. Data availability to support informed decision-making is one of the most important aspects of the SMS. Using this data for safety performance monitoring and measurement are essential activities that generate the information necessary for safety risk decision-making.
2. Safety performance monitoring and measurement should be conducted observing some basic principles. The safety performance achieved is an indication of organisational behaviour and is also a measure of the effectiveness of the SMS. This requires the organisation to define:
 - a. Safety Objectives – Safety objectives should be established first to reflect the strategic achievements or desired outcomes related to safety concerns specific to the organisation’s operational context and produced in a Suitable, Measureable, Achievable Relevant and Timely format (SMART);
 - b. Safety Performance Targets (SPTs) - SPTs are tactical level SMART goals that work individually or as a group to monitor progress towards the achievement of the safety objectives.
 - c. Safety Performance Indicators (SPIs) - SPIs are tactical parameters related to safety objectives and SPTs and therefore are the reference for data collection; and
3. SPIs are used to measure operational safety performance of the organisation and the performance of their SMS. SPIs rely on the monitoring of data and information from various sources including the safety reporting system. They should be specific to the individual organisation and be linked to the safety objectives already established.
4. When establishing SPIs organisations should consider:
 - a. Measuring the right things - Determine the best SPIs that will show the organisation is on track to achieving its safety objectives and SPTs. Also consider what are the biggest safety issues and safety

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- risks faced by the organisation, and identify SPIs which will show effective control of these.
 - b. Availability of data - Is there data available which aligns with what the organisation wants to measure? If there isn't, there may be a need establish additional data collection sources. For small organisations with limited amounts of data, the pooling of data sets may also help to identify trends. This may be supported by industry associations who can collate safety data from multiple organisations.
 - c. Reliability of the data - Data may be unreliable either because of its subjectivity or because it is incomplete.
 - d. Common industry SPIs - It may be useful to agree on common SPIs with similar organisations so that comparisons can be made between organisations. The regulator or industry associations may enable these.
5. A more complete picture of the organisation's safety performance will be achieved if SPIs encompass a wide spectrum of indicators. This should include:
- a. low probability/high severity events, eg accidents and serious incidents;
 - b. high probability/low severity events, eg uneventful operational events, non-conformance reports, deviations etc;
 - c. process performance, eg training, system improvements and report processing;
 - d. qualitative and quantitative type indicators; and
 - e. leading (inputs) and lagging (outputs) type indicators.
6. Primarily, safety performance monitoring and measurement provides a means to verify the effectiveness of safety risk control measures, a requirement of the Work Health and Safety Regulations 2011, in particular Regulations 37 and 38.

Internal audits

7. Internal audits are performed to assess the effectiveness of the SMS and identify areas for potential improvement. Internal audits are most effective when conducted by persons or departments independent of the functions being audited. Such audits should provide the accountable manager and senior management with feedback on:
- a. the current state of compliance with DASR regulations;
 - b. the current state of compliance with policies, processes and procedures;
 - c. the effectiveness of safety risk control measures;
 - d. the effectiveness and status of recent corrective actions;

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- e. any deficiencies identified in the SMS; and
 - f. any opportunities for improvement for the SMS.
8. Some organisations cannot ensure appropriate independence of an internal audit, in such cases, the organisation should consider engaging external auditors (e.g. independent auditors or auditors from another organisation).
9. The results of the internal audit process become one of the various inputs to the SRM process and safety oversight and improvement functions. Internal audits inform the organisation's management of the level of compliance within the organisation, the degree to which safety risk controls are effective and where corrective or preventive action is required.

AMC SMS.A.25(b)(3)(3.1) - Safety performance monitoring and measurement (AUS)

1. The organisation must develop and maintain a means to verify, monitor and measure the safety performance of the organisation. As a result, the organisation must be able to demonstrate the following:
 - a. Safety targets and performance indicators have been defined, promulgated and are being monitored and analysed for trends, forming part of the SMS review.
 - b. Safety targets and performance indicators are reviewed and updated periodically.
 - c. There is an internal safety audit programme that focuses on the safety performance of the organisation and its services.
 - d. Information obtained from safety oversight and improvement and compliance monitoring activities feeds back into the safety risk management process.

3.2 The management of change [AMC GM](#)

GM SMS.A.25(b)(3)(3.2) - The management of change (AUS)

THE MANAGEMENT OF CHANGE

1. Organisations experience change due to a number of factors including, but not limited to:
 - a. organisational expansion or contraction;
 - b. business improvements that impact safety; these may result in changes to internal systems, processes or procedures that support the safe delivery of the products and services;
 - c. changes to the organisation's operating environment;
 - d. changes to staffing numbers;
 - e. changes to shift work schedules;
 - f. changes to the SMS interfaces with external organisations;
 - g. legislative and regulatory changes; and

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- h. economic changes and emerging risks.
- 2. Change may affect the effectiveness of existing safety risk controls. In addition, new hazards, and related safety risks may be inadvertently introduced into an operation when change occurs. Hazards should be identified and related safety risks assessed and controlled as defined in the organisation's existing hazard identification and SRM procedures.
- 3. Small incremental changes often go unnoticed, but the cumulative effect can be considerable. Changes, large and small, might affect the organisation's system description, and may lead to the need for its revision. Therefore, the system description should be regularly reviewed to determine its continued validity, given that most organisations experience regular, or even continuous, change.
- 4. The organisation should define the triggers for the formal change process. Changes that are likely to trigger 'management of change' processes include:
 - a. introduction of new technology or equipment;
 - b. changes in the operating environment;
 - c. changes in key personnel;
 - d. significant changes in staffing levels;
 - e. changes in safety regulatory requirements;
 - f. significant restructuring of the organisation; and
 - g. physical changes (new facility or base, aerodrome layout changes etc.).

AMC SMS.A.25(b)(3)(3.2) - The management of change (AUS)

- 1. The organisation must develop and maintain a process to identify and treat new or different risks that may arise from changes at the workplace. As part of this process the organisation must be able to demonstrate the following:
 - a. The organisation has established a process to conduct hazard analyses and risk assessments for major operational changes, major organisational changes and changes in key personnel.
 - b. Key stakeholders are identified and involved in the management of change process.
 - c. Previous risk assessments and existing hazards are reviewed for possible effect.

3.3 Continuous improvement of the SMS **AMC GM**

GM SMS.A.25(b)(3)(3.3) - Continuous improvement of the SMS (AUS)

CONTINUOUS IMPROVEMENT OF THE SMS

- 1. Maintenance and continuous improvement of the organisation's SMS effectiveness is supported by safety oversight and improvement activities that include the verification and follow up of actions and the internal audit

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- processes. It should be recognised that maintaining and continuously improving the SMS is an ongoing journey as the organisation itself and the operational environment will be constantly changing.
2. Assessing the SMS's effectiveness should not be based solely on SPIs; organisations should aim to implement a variety of methods to determine its effectiveness, measure outputs as well as outcomes of the processes, and assess the information gathered through these activities. Such methods may include:
 - a. audits,
 - b. assessments,
 - c. monitoring of occurrences,
 - d. safety surveys,
 - e. management reviews,
 - f. evaluation of Safety Performance Indicators (SPIs) and Safety Performance Targets (SPTs), and
 - g. addressing lessons learnt.
 3. Ongoing monitoring of the SMS, its related safety risk controls and support systems assures the organisation that the safety management processes are achieving their desired safety performance objectives.

Safety committees

4. The organisation should consider the establishment of safety committees to support the continuous improvement of SMS effectiveness. Some types of safety committees that organisations may consider establishing include:
 - a. **Safety Review Board (SRB)** – A high level safety committee that discusses the strategic direction and performance of the SMS.
 - b. **Safety Action Group (SAG)** – Operationally focused safety committees that coordinate the implementation of safety strategies decided by the SRB.

AMC SMS.A.25(b)(3)(3.3) - Continuous improvement of the SMS (AUS)

1. The organisation must develop and maintain a process to ensure continuous improvement of the performance of the SMS. As part of this process the organisation must be able to demonstrate the following:
 - a. A Safety Committee has been established and has the authority to make decisions related to the improvement and effectiveness of the SMS.
 - b. The SMS is periodically reviewed such that improvements in safety performance can be demonstrated.

4. SAFETY PROMOTION:

4.1 Training and education [AMC GM](#)

GM SMS.A.25(b)(4)(4.1) - Training and education (AUS)

TRAINING AND EDUCATION

1. Personnel being trained and competent to perform their SMS duties, regardless of their level in the organisation, is an indication of management's commitment to an effective SMS. The training programme should include initial and recurrent training requirements to maintain competencies. Initial safety training should consider, as a minimum, the following:
 - a. organisational safety policies and safety objectives;
 - b. organisational roles and responsibilities related to safety;
 - c. a foundational understanding of the SRM process;
 - d. safety reporting systems;
 - e. the organisation's SMS processes and procedures; and
 - f. human factors.
2. Recurrent safety training should focus on changes to the SMS policies, processes and procedures, and should highlight any specific safety issues relevant to the organisation or lessons learnt.
3. The training programme should be tailored to the needs of the individual's role within the SMS. For example, the level and depth of training for managers involved in the organisation's safety committees will be higher than personnel directly involved with delivery of the organisation's product or services.

Training needs analysis

4. For most organisations, a formal training needs analysis (TNA) is necessary to ensure there is a clear understanding of the operation of the organisation, the safety duties of the personnel and the available training. A typical TNA will normally start by conducting an audience analysis, which usually includes the following steps:
 - a. Identify each safety duty and in what ways they will interact with the safety management processes, inputs and outputs.
 - b. Identify the knowledge and competencies needed to perform each safety duty and the knowledge and competencies required by each staff grouping.
 - c. Conduct an analysis to identify the gap between the current safety skill and knowledge across the workforce and those needed to effectively perform the allocated safety duties.
 - d. Identify the most appropriate skills and knowledge development approach for each group with the aim of developing a training programme appropriate to each individual or group's involvement in safety management.

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5. The main purpose of the safety training programme is to ensure that personnel, at all levels of the organisation, maintain their competence to fulfil their safety roles; therefore, competencies of personnel should be reviewed on a regular basis.

AMC SMS.A.25(b)(4)(4.1) - Training and education (AUS)

1. The organisation must establish a process to ensure that personnel are trained and competent to perform their SMS duties. As part of this process the organisation must be able to demonstrate the following:
 - a. There is a documented process to identify Safety Management training requirements so that personnel are competent to perform their duties and takes appropriate remedial action when necessary.
 - b. Appropriate action is taken to measure and possibly improve the effectiveness of training.
 - c. A training record is maintained for all personnel.

4.2 Safety communication **AMC GM**

GM SMS.A.25(b)(4)(4.2) - Safety communication (AUS)

SAFETY COMMUNICATION

1. There should be a communication strategy that enables safety communication to be delivered by the most appropriate method based on the individual's role and need to receive safety related information. This may be done through safety newsletters, notices, bulletins, briefings or training courses. The safety manager should also ensure that lessons learned from investigations and case histories or experiences, both internally and from other organisations, are distributed widely.
2. Organisations should consider whether any internal safety information needs to be communicated to external organisations.
3. Organisations should assess the effectiveness of their safety communication by checking personnel have received and understood any safety critical information that has been distributed. This can be done as part of the internal audit activities or when assessing the SMS effectiveness.
4. Safety promotion activities should be carried out throughout the life cycle of the SMS, not only at the beginning.

AMC SMS.A.25(b)(4)(4.2) - Safety communication (AUS)

1. The organisation must establish a process to ensure that personnel, internal and external to the organisation, have current and pertinent safety information. As part of this process the organisation must be able to demonstrate the following:
 - a. There is a communication strategy to ensure the safety policy and safety information is communicated to all personnel with the intent

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- that they are made aware of their individual contributions and obligations with regard to safety.
- b. Significant events and investigation outcomes associated with the organisation are communicated to all personnel, including contracted organisations where appropriate.

NOTES:

NOTE 1: The word ‘assurance’, as used by ICAO, has been replaced with ‘oversight and improvement’ so as to avoid confusion between oversight and improvement activities that are conducted by the organisation and the assurance activities of the Authority.

NOTE 2: The approved organisation may elect to extend one SMS across multiple organisations and organisation types. Where this is the case, approved organisations must ensure that a accountable manager and safety manager are positioned within their own organisation or an overarching organisation.

NOTE 3: The SMS framework required by this regulation is not designed to satisfy the requirements of safety management systems required by ‘major hazard facilities’. If the approved organisation believes that it may be a ‘major hazard facility’ as defined in the Work Health and Safety Regulations 2011, it should notify Safe Work Australia for further guidance on this matter.

DASR SMS TRANSITION AND CHANGE MANAGEMENT ARRANGEMENTS

Annex B: Excerpts from *DASR 145 & DASR M*

Previous AMC 145.A.30 paragraph 1 (Table)

1. The following table summarises those personnel who require, or do not require, a DASR Form 4 accepted by DASA.

MANAGEMENT PERSONNEL	DASR Form 4 Required
Accountable Manager (DASR 145.A.30(a))	No
Nominated Personnel (Responsible Manager * and Quality Manager) (DASR 145.A.30(b) and DASR 145.A.30(c))	Yes
Safety Manager (DASR AMC SMS.A.25(b)(1)(1.3))**	No
Other Management Personnel (DASR AMC 145.A.30(b)(8))	No
NDT Responsible Level III (DASR 145.A.30(f))**	Yes***
Notes: * Includes base maintenance manager, line maintenance manager and workshop manager IAW AMC 145.A.30(b). ** If required for the scope of business *** DASR Form 4 not required when a member of DASA.	

Previous AMC M.A.706, paragraph 5 (Table)

5. The following table summarises those personnel who require, or do not require, a DASR Form 4 accepted by DASA.

MANAGEMENT PERSONNEL	DASR Form 4 Required
Accountable Manager (DASR M.A.706(a))	No
Continuing Airworthiness Manager (DASR M.A.706(d))	Yes
Quality Manager (DASR M.A.706(f) and DASR M.A.712(a))	Yes
Safety Manager (DASR AMC SMS A.25(b)(1)(1.3))*	No
Other Management Personnel (DASR M.A.706(c))	No
Airworthiness Review Staff (DASR M.A.707(b))	Yes
Maintenance Program Approval Employee (DASR AMC M.A.706(f))	No
Note: * If required for scope of business.	



Australian Government

Department of Defence

Defence Aviation Safety Authority

Defence Aviation Safety Authority

DASR SMS - Transition and Change Management Plan

Capability First, Safety Always



(Original signed)
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REFERENCES

- A. Defence Paper – *Senior Executive Review into the Assurance of Military Air Operations at Elevated Levels of Airworthiness Risk*, of 25 Jun 2020
- B. Manual – *Defence Aviation Safety Manual Ed 3 AL1*, of 01 Apr 2024
- C. Report – *Benchmarking Part 3a – Comparative Report Aviation Safety Management Systems (SMS) – Policy and Regulatory Frameworks*, of 1 Mar 2023

INTRODUCTION

1. DASA released the update to Defence Aviation Safety Regulation (DASR) *Safety Management Systems (SMS)* on 27 Feb 2026. This update satisfies DASA's requirement to provide Accountable Managers (AMs) with effective SMS regulation and policy to enable AMs to meet their WHS Act 2011 (Commonwealth) obligations in the Defence Aviation context.
2. Currently, many AMs implement and maintain their organisation's SMS IAW the Defence Aviation Safety Manual (*DASM*), to comply with *DASR SMS*.¹ The SMS benchmarking activity identified material in the *DASM* that would be more appropriately contained in *DASR SMS* regulation, Acceptable Means of Compliance (AMC) or Guidance Material (GM).² *DASR SMS* (Feb 26 release) addresses current SMS regulation shortcomings and concerns with DASA's assurance of Military Air Operations and AMs (Ref A).
3. At the conclusion of the *DASR SMS* transition period³, DASA will withdraw the *DASM* (Ref B) and cancel Advisory Circular (AC) 003/2018 *Risk Management in the DASP*—with this material already incorporated into the Feb 26 release of *DASR SMS*. DASA will also require the Defence Aviation Safety Community (hereafter simply called 'safety community') attest their organisation's SMS is compliant with *DASR SMS* (Feb 26 release) prior to the end of the transition period.⁴

PURPOSE

4. The purpose of this *DASR SMS* transition and change management plan is to inform the safety community of transitional requirements. Additionally, it outlines DASA's expectations to enable compliance with the new *DASR SMS* (Feb 26 release) by Feb 2027. Ref B forms the basis for DASA's change management considerations detailed in this plan.⁵

DASR SMS TRANSITION

Background

5. **Stakeholders.** The following appointments and organisation types may be impacted by the introduction of the published *DASR SMS* (Feb 26 release):
 - a. Design Organisations (DASR 21J)
 - b. Production Organisations (DASR 21G)
 - c. Military Type Certificate Holder Organisations (DASR 21C)
 - d. Continuing Airworthiness Management Organisations (DASR M)
 - e. Maintenance Organisations (DASR 145)
 - f. Military Air Operators (MAOs - DASR ARO.100)
 - g. Aerodrome Operators (DASR 139)

¹ IAW the previous *DASR SMS* version, AMC SMS 25(a)—the *DASM* is Defence's corporate aviation SMS solution.

² DASA benchmarked CASA, EASA, FAA, NLD MAA and UK MAA, Ref C refers.

³ The *DASR SMS* transition period is scheduled to conclude Feb 2027.

⁴ IAW extant arrangements, or arrangements to be agreed with DASA's Desk Officers.

⁵ *Defence Aviation Safety Manual Part 3 Chapter 2 – The Management of Change*.

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- h. Air Navigation Service Providers (DASR ANSP)
- i. Air Cargo Delivery Service Providers (DASR ACD)
- j. Uncrewed Aircraft System operators (DASR UAS).

6. **Scope of DASR SMS changes.** There are no new additional regulatory controls introduced in *DASR SMS* (Feb 26 release). However, AMC to *DASR SMS* (Feb 26 release) incorporates the implicit and explicit means of compliance currently contained in the *DASM* (Ref B).

7. **Transition schedule.** Unless otherwise agreed by DASA, all affected organisations are expected to transition to the Feb 26 version of *DASR SMS* by 27 Feb 27, as shown in Figure 1 below.

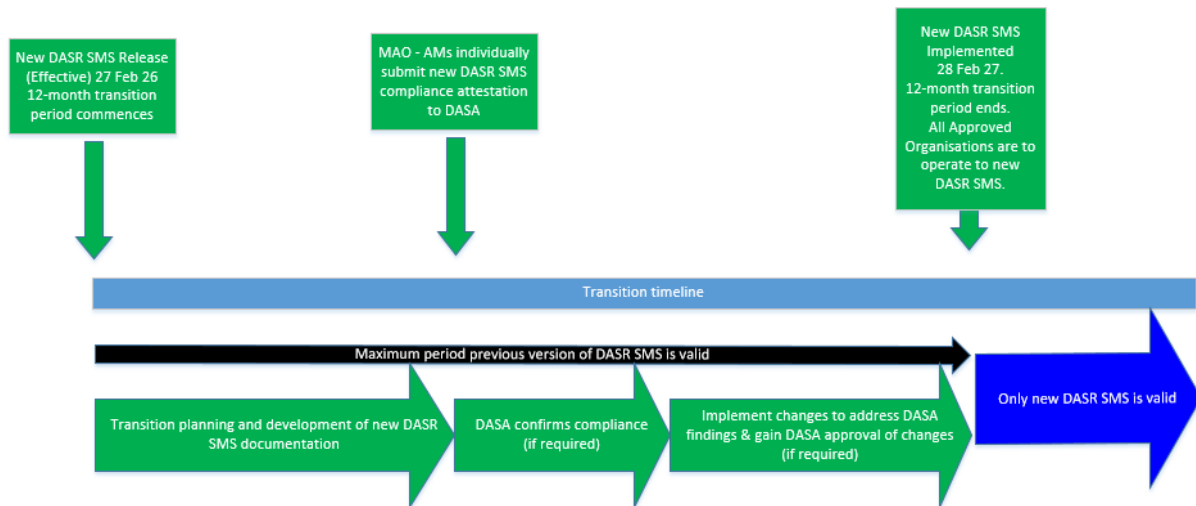


Figure 1 – DASR SMS transition schedule

DASR SMS CHANGE MANAGEMENT

Commitment to the change

8. DASA SMS staff will engage the safety community to assist AMs' transition to *DASR SMS*. DASA will pause issuing Findings on the previous *DASR SMS* during the transition period, unless DASA identifies a serious risk to safety, and instead assist in evaluation and transition of the organisation's SMS to the new regulation. AMs' POCs can expect regular contact and assistance from DASA staff.

9. To ensure an organisation's successful *DASR SMS* (Feb 26 release) transition by 27 Feb 27, AMs should actively plan schedules and lines of effort that enable transition (see Fig. 1), ensuring implementation of enduring processes and behaviours.

Change to organisational design, accountabilities and responsibilities

10. Organisations may require changes to their organisation structure and Key Safety Personnel (KSP) roles and responsibilities—to achieve effective transition to *DASR SMS* (Feb 26 release). AMs should dedicate sufficient resources early to identify organisational change requirements. Implementation of organisational change may require additional effort to confirm changes are effective and enduring, including finessing of changes through formalised continuous improvement tasks.

Training, mentoring and communication

11. **DASA-led transition activities.** DASA will implement a program of education and gap training to the safety community through the transition period. These include:

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- a. **MAO SMS and QMS reviews.** A 'One DASA' approach to provide efficiency assessments of MAOs' aviation SMS and aviation QMS, and to workshop improved solutions to aviation SMS and aviation QMS outcomes.
- b. **SMS Town Halls.** These provide a regular on-line opportunity to engage the safety community, focused on safety community feedback and requirements. In particular, to clarify DASA's *DASR SMS* (Feb 26 release) expectations in a Q&A forum format (GovTeams).
- c. **Safety training.** DASA has scheduled nine sessions of SMS Practitioner course in 2026. These are available to the safety community and attendance on a session is a prerequisite for Aviation Safety Officer (Initial) (ASO(I)) attendance. The SMS Practitioner course aims to improve safety community understanding and application of *DASR SMS*. DASA Training accepts SMS Practitioner nominations via the DASA website.
- d. **Military Air Operators (MAO) convocation.** Aligned with the Air Command Board, the convocation provides a forum for MAO AMs to discuss and exchange common aviation safety knowledge and lessons learned towards improved generative safety cultures.

Policy, plans and process changes

12. To assist AMs to transition their extant documents and processes to *DASR SMS* (Feb 26 release), DASA has included a cross-reference matrix in AC 001/2026 Enclosure 2, to detail where content in the *DASM* is now located in either *DASR SMS* (Feb 26 release) or its supporting material.

13. Additionally, throughout 2026 DASA will advise the safety community (via DASA News Breaks) of further *DASR SMS* supporting material-related releases. These will include updates to DASA's SMS website (Jul/Nov); refinement of DASPMAN Volume 3 (Aug); amendments to the Present, Suitable, Operating and Effective (PSOE) SMS assessment indicator methodology (published on DASA SMS website); and other information that will support the safety community in their transition to *DASR SMS* (Feb 26 release). In particular, the updated PSOE indicators will assist AMs to validate their SMS OIP updates for compliance to the new *DASR SMS* (Feb 26 release), prior to DASA evaluation of an organisation's transition readiness.

14. During the transition period, AMs that use the *DASM* to demonstrate compliance are required to update their SMS-related documents and processes to account for its retirement. Organisations are required to contextualise, through their SMS documentation and processes, the requirements of the new regulation, commensurate with the size of their organisation and the complexity of its aviation activities, products and services.

Information technology, data and record requirements

15. *DASR SMS* (Feb 26 release) does not impose additional information technology, data and record requirements. However, AMs should implement efficiency gains identified during transition.

Compliance, conformance and performance systems

16. **DASA assurance.**

a. ***DASR SMS* (Feb 26 release): organisational readiness to transition.**

- (1) **For operations related organisations.** DASA Desk Officers will engage the safety community to discuss. However, DASA aims to conduct desktop evaluations of AMs' compliance submissions (if required) prior to providing DASA approval to transition to *DASR SMS* (Feb 26 release). DASA will evaluate the organisation's submission IAW the PSOE methodology, primarily focusing on the Present and Suitable elements. During transition, DASA will not issue findings on the old *DASR SMS*, unless a serious risk to safety is identified. Instead, DASA will use the opportunity to assist the safety community with education and with responses to queries raised, to maximise the organisations' opportunity to achieve compliance with *DASR SMS* (Feb 26 release). Compliance submission evidence will include:

- (a) an attestation, by the AM, that the organisation is compliant with *DASR SMS* (Feb 2026 release)

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- (b) updated Compliance Statement (CS) or exposition statement
 - (c) supporting OIP (or Share Point or website links) to the CS or exposition statement.
- (2) **For airworthiness and training-related organisations.** DASA Desk Officers will assist organisations to transition IAW their extant DASR requirements.
- b. **DASR SMS (Feb 26 release): on-going O&E.** Post organisational transition to *DASR SMS* (Feb 26 release), DASA will conduct on-going O&E per agreed schedules, focussing on the evaluation of conformance and effectiveness elements of the PSOE methodology (ie Operating and Effective). Specifically, DASA's evaluation will aim to reduce the number of systemic DASA findings related to SMS issues.
17. **AM compliance with *DASR SMS* (Feb 26 release).** Approved Organisations are required to comply with *DASR SMS* prior to 27 Feb 27, unless prior DASA agreement to an extension has been gained. However, organisations can also plan to transition to the new regulation at any time during the transition period.

SUMMARY

18. There will be no new additional regulatory controls introduced in the update to *DASR SMS*; however, the amended AMC to *DASR SMS* will co-locate SMS-related controls previously contained in the *DASM* and other extant DASR⁶. Accordingly, DASA does not foresee significant safety community impediments to implementing the updated *DASR SMS*. Implementation of *DASR SMS* (Feb 26 release) will occur over 12 months, with the transition period ceasing 27 Feb 27. DASA will consider extensions to the transition period on request.
19. DASA is available during the transition period to assist the safety community in producing compliant and effective updated SMS processes. However, DASA-provided education and training is critical to assist the safety community in a smooth transition to *DASR SMS* (Feb 26 release).
20. The point of contact for this *DASR SMS* transition and change management plan is WGCDR Brian Brown – DD SMS (DAVNOPS-DASA) at 02 5109 6547, or brian.brown2@defence.gov.au.

⁶

DASR AIRCREW.60 and DASR AIRCREW.65