



SUMMARY OF CONSULTATION

Proposed amendment to Part 66 Manual of Standards (MOS) aircraft engineer licensing training

Part 66 Manual of Standards

Date	February 2020
Project number	MS 16/05
File ref	D19/382835

Overview

CASA published the Consultation Draft (CD 1908SS) on proposed amendments to the Part 66 Manual of Standards (MOS) - aircraft engineer licensing training, on the Consultation Hub from 30 August to 27 September 2019. The consultation invited industry to provide feedback and comments on a set of proposed amendments that would introduce a new 'self-study' training and examination pathway that would lead to the grant of a Part 66 aircraft engineer licence.

The proposed new pathway is an alternative to the current requirement to undertake licence category training via a Part 147 Maintenance Training Organisation (MTO) and will be similar to the CASA Basics examinations/Schedule of Experience scheme that existed under the previous CAR 31 licensing system. A summary of feedback received is provided below. CASA appreciates the time taken by industry to respond during the consultation period and the contributions made by all respondents

Respondents

CASA received a total of one hundred and twenty-nine (129) submissions to the consultation from 129 respondents. Eighty-one (81) respondents consented to having their comments published on the CASA website, forty-three (43) requested their comments remain confidential and five (5) responses were from CASA officers. Where permission has been granted, individual responses are available on the CASA Consultation Hub.

Key feedback

From the 129 submissions received:

- Ninety-six (96) respondents indicated support for the proposal to introduce a new 'self-study' training and examination pathway
- Fourteen (14) respondents did not support the proposal
- Twelve (12) respondents didn't provide support for the proposal either way.

Across all received feedback, the common themes commented on were:

- Affordability of training. Fees currently charged by Part 147 MTOs makes training for a Part 66 licence largely unaffordable.
- Access to Part 147 training including geographical distances from available MTOs, travel costs and the time off work required (i.e. periods of block release, or minimum one-year full-time study) to attend training.
 - Currently there is no alternative pathway for adult qualified tradespersons to achieve a Part 66 licence without having to attend an MTO. Without affordable training pathway options, adult qualified tradespersons are less likely to consider a career in aircraft maintenance. Self-study is the only viable option for many engineers, due to location and work commitments.
- Recognition of prior learning (RPL) assessment costs are very costly and frustratingly slow to get an outcome after paying large costs.

SUMMARY OF CONSULTATION ON PROPOSED AMENDMENT TO PART 66 MANUAL OF STANDARDS (MOS) AIRCRAFT ENGINEER LICENSING TRAINING

- Licensed Aircraft Maintenance Engineer (LAME) shortage where the current training pathway limits opportunities for individuals qualified in affiliate trades from considering a career in aircraft maintenance. More aircraft engineers are needed, and these changes will hopefully provide an alternate pathway for people to achieve these qualifications.
- Flexibility offered under self-study option – self-study allows an AME to earn a living and gain the required experience while acquiring the required knowledge.
- Current training package issues – misalignment of the Diploma of Aeroskills qualification required for a category of licence to the knowledge modules stated in the 66 MOS (i.e. misalignment of units of competency to the Part 66 knowledge syllabus).
- Lack of availability of clear guidance and or information for training pathways, process and options – both CASA and the Part 147 MTOs need to provide clear guidance and information to prospective students that identifies training pathway options.

Theme 1 – Affordability of training

Fifty-six (56) respondents commented on the current costs of training conducted by Part 147 MTOs as being a major concern, with one respondent stating:

"Costs involved with full-time study, as well as the need to, probably, re-locate from home is a major disincentive to take up study."

Theme 2 – Access to Part 147 training

Twenty-eight (28) respondents commented on the difficulties in accessing Part 147 training due to their geographical location and the requirement to take time off work to attend training, with one respondent stating:

" ... in regional and remote Australia it has become increasingly difficult for young people to obtain their licences through the Part 147 system, mainly due to the isolation and cost of travel. Operators have been less likely to employ apprentices because of this."

Theme 3 – RPL assessment costs

Respondents also commented on the current costs for RPL assessments, with one respondent stating:

" RPL process is costly & frustratingly slow to get an outcome after paying a large cost."

Theme 4 – LAME shortage

Twenty-two (22) respondents commented on the current shortage and decline of LAMEs in the aircraft maintenance sector. Examples of those comments were:

"The current system is an onerous and costly one which effectively discourages those participants from becoming licensed. This has created a shortage of licensed engineers as older LAMEs retire or leave the industry."

"There needs to be a pathway for adult qualified tradespersons to achieve a LAME Licence without going to a Training School. For many decades the industry has gained LAMEs from the CASA Basics/SOE system. A Part 66 self-study pathway must work as well as the previous SOE system or there will be no LAME's in the future of GA."

"The self-study initiative is essential to increasing the number of LAMEs for our future industry, especially in regional areas."

"To hard for AME's to gain Licence qualifications at present due to the RTO/MTO attendance requirement."

"The ability for a candidate to complete a self-study pathway whilst employed and engaged in practical training will ensure a competency and retention rate that is required urgently within industry."

Theme 5 – Flexibility offered under self-study option

Twenty-one (21) respondents commented on the flexibility that may present through introduction of a self-study pathway. Examples of those comments were:

"...within the next 10 years there will be a massive shortage of qualified and competent engineers largely due to an aging workforce and the excessive cost, time and access to training for apprentices with Part 147 organisations. It appears the current training system is not sustainable long term and a flexible education option will enable greater access for AMEs to achieve theory training requirements whilst having the added benefit of continuing day to day employment."

"I would like to become a licensed engineer but the cost of travel and also to be away from family and the time off work to train at an institution is almost impossible for me. Logging my experiences working on aircraft with the extremely talented engineers I work with and taking exams close to where I live is the best news I've heard in ages. Keep it simple and it will be much easier for everyone."

Suggestions and requests for a self-study system to provide flexibility to:

"include the ability to self-study specific modules (and do the required practical) for the removal of exclusions."

"enable a new starter to do only the required modules and practical for a basic licence without having to complete all Part 66 training modules."

"enable a person who has started with a Part 147 training provider to change to self-study, or vice versa."

"enable a person who self-studies aeroplane piston engine modules and gets a licence, to be able to later self-study additional modules for further licence scope."

CASA response to these suggestions and requests for a self-study system:

CASA notes these suggestions. The detailed policies for the proposed self-study pathway that will address the comments above are yet to be discussed in detail by CASA.

Theme 6 – Current training package issues

Fifteen (15) respondents commented on issues with the current Aeroskills training package, with one respondent stating:

"...the units of competency do not align with CASR Part 66 Module examination requirements."

"Due to this misalignment and involvement of other agencies like IBSA and ASQA, the student enrolments have reduced and the delivery of Aeroskills qualification plus conducting CASR Part 66 Module examinations has become very expensive for all

TAFE's business. Also, the student and most of their employers are unable to afford the cost of the examinations and the fees for the all units of competency."

Theme 7 – Lack of availability of clear guidance/information for training pathways/process/options

Three (3) respondents commented on the lack of availability of clear guidance and information for training pathways, processes and options. Examples of those comments were:

"I currently have a B2, am trying to get my B1.2 Licence thru a 147 school and have had nothing but problems. The whole process has been full of hurdles with no clear path to gaining a licence."

"the life of our industry is fast expiring from lack of a clear, unambiguous and suitable pathway to become licensed to certify for maintenance in our industry."

"...we require clear information and guidelines for current part 66 licence holders to gain additional licences or exclusion removal via self-study."

Additional comments about miscellaneous Part 66 MOS amendments

In addition to the proposed self-study pathway, this consultation included other miscellaneous amendments to reduce complexity of the Part 66 MOS, to more closely align to EASA Part 66. Respondents comments to some of these miscellaneous changes were:

"If the mandate is to use EASA why not adopt directly – By continuing not to embrace the entire words we continue to have interpretation and add complexity to a regulatory set that is quickly becoming the global standard for aviation. This is the direction CASA should adopt so that LAME qualifications will be globally recognised. The result would allow Australian MRO's, large and small, to be significantly more capable of acquiring work in the Asia-Pacific region which is a theme being put forward by many State Governments and also the Federal Government. Additionally, this would further align Defence qualifications after their recent implementation of the DASR suite of regulations which essentially mirror EASA Part 66. Australia's regulator, CASA, due to its relationship with the AQF competency framework in Part 66, could lead the world in this area. Competency assessment against the workplace is something that most NAA's around the world are currently trying to understand."

" The real issue here, is the lack of a licence outcome suited for the smaller GA organisations"

"...guidance the TWG was given, first and foremost,...follow EASA principles and where possible align/adopt this approach. Therefore, it is extremely disappointing that the EASA B3 licence outcome which embraces <2000kgs piston engine unpressurised aircraft (those typically used in the remote areas) is not part of this consultation."

"It is a good move that CASA allows Part 66 exams to replace the old CASA basics at their exam centres and that in conjunction with the B3 option would go a long way to resolving this ongoing issue. It also provides a graduated pathway, much like the old CASA basics did, that can be built on if LAME's decided to move into the larger RPT organisations."

Future direction

The primary purpose of this consultation process was to seek feedback on a proposal to introduce a self-study training and an examination pathway that leads to the grant of a Part 66 aircraft engineer licence. Overall, respondents strongly support the proposal. The other proposed miscellaneous changes to the Part 66 MOS were also generally supported.

CASA met with the Part 66 Technical Working Group (TWG) in January 2020 to discuss the self-study proposal and the proposal received consensus support from the TWG (information about the Part 66 TWG is available on the CASA website).

CASA acknowledges and agrees with the comments in relation to improving alignment with EASA, reducing cost, improving accessibility, and developing more proportionate licensing outcomes for small, simple aircraft. CASA considers a self-study pathway a necessary and practical means to help address the first three points and a necessary building block in addressing the fourth.

CASA will, with close consideration given to feedback provided, proceed with development of the detailed policies and administrative systems required for introduction of the new self-study pathway.

On completion of that work in the first half of 2020, CASA will seek additional feedback from industry on the detailed policies and requirements through a second round of consultation with the Part 66 TWG and the wider industry.