# Proposed amendments to Schedule 3 of the Part 61 Manual of Standards to support implementation of the Flight Operations Regulations and to ensure it is fit for purpose - (CD 2110FS)

# Overview

Part 91 of CASR and the associated flight operations rules, will introduce some change to what pilots and operators need to know or do during the application of the privileges of their authorisations. As a result, we propose to amend the Schedule 3 standards.

The proposed amendments will ensure:

* harmonisation with the new Part 91 and associated flight operations rules
* aeronautical knowledge content of Schedule 3 will be fit for purpose for developing syllabuses for courses of training, and content for the various FCL exams
* CASA exam question bank will contain, and develop, contemporary and relevant questions appropriate for each subject, and deliver accurate knowledge deficiency reports.

### Principal changes

The primary purpose of the review and amendment to Schedule 3 is to align content and vocabulary with Part 91 and associated flight operations rules.

Concurrent amendments include:

* editorial changes to make elements associated with the helicopter units more relevant to that aircraft category
* improvements to support Schedule 2 practical competencies and underpinning knowledge currently examined for the issue of licences, ratings and endorsements
* action words added to many of the schedule’s unit elements which articulate the level to which the knowledge in the standard must be demonstrated on completion of a course of training, essential for the document to be regarded as an authoritative competency standard
* correction of grammar and formatting errors.

### Previous consultations

Following extensive consultation with the aviation community from 2011, the general operating and flight rules package was published for public review as CD 1511OS - Part 91 of CASR and associated MOS for general operating and flight rules in August 2015. We published a further consultation draft of the proposed Part 91 of CASR and its associated Manual of Standards (MOS) for general operating and flight rules on our Consultation Hub in March 2018 with summary of consultation published in August 2018. Feedback on Part 91 of CASR from previous consultations in 2011 and 2015 was considered and incorporated into the 2018 consultation drafts.

A Flight Operations Regulations Implementation Technical Working Group (TWG) was established by the Aviation Safety Advisory Panel (ASAP) in June 2021. The TWG has provided current, relevant technical expertise, feedback and recommendations to CASA (and ASAP, where relevant) on implementation activities for the benefit of industry.

The proposed changes to Part 61 MOS Schedule 3 are consequential to the implementation of the flight operations rules.

# Why your views matter

We recognise the valuable contribution consultations make to the policy decision-making process and future regulatory change. We are consulting to ensure that the proposed amendments to Part 61 MOS, Schedule 3 accurately and practically reflect the new rule set and will work in practice as intended.

This consultation seeks feedback on the proposed amendments to Part 61 MOS, Schedule 3. Although Schedule 3 is most relevant to aspiring pilots, training organisations, course developers and examination writers, comments are sought from every sector of the community. This includes the general public, government agencies and all sectors of the aviation industry.

The survey below has been designed to give you the option to provide feedback on the policy topics applicable to you.

Your feedback will make a valuable contribution to our standards development and making process and help to inform any future regulatory change.  Comments should be submitted through the online response form.

## **Documents for review**

All documents related to this consultation are attached in the ‘related’ section at the bottom of the page. They are:

* Summary of proposed change on CD 2110FS, which provides background on the proposed standards
* Consultation Draft – Schedule 3 Part 61 MOS - Aeronautical knowledge standards
* MS Word copy of online consultation for ease of distribution and feedback within your organisation

*Note: The MS Word document is not to be used as an emailed submission, unless there are extenuating circumstances, and this form of submission has been agreed to by the consultation project lead.*

Comments on the CD 2110FS and the Consultation Draft – Schedule 3 Part 61 MOS - Aeronautical knowledge standards, should be submitted through the online response form.

## **What happens next**

At the end of the response period for public comment, we will review each comment and submission received. We will make all submissions publicly available on the CASA website, unless you request your submission remain confidential. We will also publish a Summary of Consultation which summarises the feedback received, outlines any intended changes and details our plans for the regulations.

All comments on the Consultation Draft – Schedule 3 Part 61 MOS - Aeronautical knowledge standards will be considered. Relevant feedback that improves upon the proposed regulations and is consistent with the regulations and other CASA policy, will be incorporated into the final making. The feedback we receive from this consultation will also assist us in confirming adequate implementation and transition timeframes.

While the Schedule 3 amendment should come into effect with the flight operations regulations, transition will be defined by the rate at which new exam questions are seeded into the flight crew licence exam suite. A phased approach is proposed by the Flight Crew Licensing - Aeronautical Knowledge Exams consultative group over several months.

**Post-implementation review**

We will monitor and review the amended standards during the transition phase and on an ongoing basis.

# **Give Us Your Views** [Appears on the overview page at the bottom]

[Online Survey](https://consultation.casa.gov.au/regulatory-program/pp1816us/consultation/) [This link is on the front page of the survey and takes you to the survey questions]

**Related Documents**

List of documents to attach to the consultation

* Summary of proposed change on CD 2110FS, which provides background on the proposed standards
* Consultation Draft – Schedule 3 Part 61 MOS - Aeronautical knowledge standards
* MS Word copy of online consultation for ease of distribution and feedback within your organisation

# **Audience and Interest groups**

**Audience**

* CASA staff
* Instructors and flight examiners
* Flight training organisations
* Pilots
* Sports aviation operators
* Hot air balloon operators
* Aviation Meteorology
* Forecaster/Meteorological service provider
* School/Education/Aviation Theory Provider
* Self-administering Aviation Organisations
* Parachuting sport aviation bodies
* Pilots of parachuting aircraft
* Balloon Instructors and flight examiners
* Balloon Pilots
* Balloon Sports aviation operators
* Tethered gas balloon operators
* Balloon AOC holders and applicants
* Balloon pilots holding a CP(B)L
* Sport and recreational balloon owners and pilots
* Sport aviation bodies & prospective ASAOs
* Gliding clubs
* Aircraft owner/operator
* Aerial work operator
* Part 142 operators
* Part 141 operators
* Floatplane operators

**Interest**

* Sport and recreational aviation
* Human factors
* Licensing
* Operational standards
* Flight training
* Private operations
* Self administration aviation activities
* Sport and recreational ballooning
* Training and checking systems
* In-house training for CASA FOIs
* Sport and recreational aviation - balloons
* Safety promotion

# Page 1. About this consultation

This consultation seeks feedback on the proposed amendments to Aeronautical knowledge standards contained in Schedule 3 of the Part 61 Manual of Standards.

We will ask you for:

* **personal information**, such as your name, any organisation you represent, and your email address
* **your consent** to publish your submission
* **your responses** to the proposed changes in the regulations
* **any comments** you may want to provide
* **demographic information** to help us understand your interest in the regulations

Our **website** contains more information on making a submission and what we do with your feedback.

# Page 2. Personal information

## First name

*(Required)*

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## Last name

*(Required)*

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## Email address

*If you enter your email address you will automatically receive an acknowledgement email when you submit your response.*

Email

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## Do your views officially represent those of an organisation?

*(Required)*

*Please select only one item*

[ ]  Yes, I am authorised to submit feedback on behalf of an organisation

[ ]  No, these are my personal views.

If yes, please specify the name of your organisation.

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Which of the following best describes the group you represent?

*Please select only one item*

[ ]  Pilot

[ ]  Flight instructor

[ ]  Flight examiner

[ ]  Ground instructor/lecturer

[ ]  Course of training developer

[ ]  Flight training organisation

[ ]  School or tertiary institution

[ ]  Aviation examination writer or invigilator

[ ]  Other

Please specify “Other” if selected.

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# Page 3. Consent to publish submission

To provide transparency and promote debate, we intend to publish all responses to this consultation. This may include both detailed responses/submissions in full and aggregated data drawn from the responses received.

Where you consent to publication, we will include:

* **your last name**, if the submission is made by you as an individual or
* **the name of the organisation** on whose behalf the submission has been made
* **your responses** and comments

We **will not** include any other personal or demographic information in a published response.

Do you give permission for your response to be published?

*(Required)*

*Please select only one item*

[ ]  Yes - I give permission for my response/submission to be published.

[ ]  No - I would like my response/submission to remain confidential but understand that de-identified aggregate data may be published.

[ ]  I am a CASA officer.

Information about how we consult and how to make a confidential submission is available on the [**CASA website**](https://www.casa.gov.au/rules-and-regulations/changing-rules/consultation-and-project-history/consultation-industry-and-public) **<**https://www.casa.gov.au/rules-and-regulations/changing-rules/consultation-and-project-history/consultation-industry-and-public>.

# Page 4. Feedback on proposed amendments to Schedule 3 of Part 61 MOS to support implementation of the Flight Operations Regulations and to ensure it is fit for purpose

The making of Part 91 and associated flight operations rules introduces some change to what pilots and operators need to know or do during the application of the privileges of their authorisations. As a result, we proposed to amend the Schedule 3 standards.

Principal changes are:

* vocabulary and content changes to harmonise with the new flight operations regulations
* editorial changes to make units associated with the helicopter category more relevant to that aircraft
* improvements to support underpinning knowledge required for Schedule 2 practical competencies
* action words added to a number of the schedule’s unit elements which articulate the level to which the knowledge in the standard must be demonstrated on completion of a course of training
* correction of grammar and formatting errors.

The following questions seek feedback on the proposed principal changes.

1. Do you agree that the changes harmonise Schedule 3 units with the new flight operations rules?

*Radio buttons*

[ ]  Agree

[ ]  Agree with changes (please specify suggested changes below)

[ ]  Disagree (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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1. Do you agree with the editorial changes to make units associated with the helicopter category more relevant to that aircraft?

*Radio buttons*

[ ]  Agree

[ ]  Agree with changes (please specify suggested changes below)

[ ]  Disagree (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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1. Do you agree the action words added to several Schedule 3 unit elements accurately state the level to which the knowledge in the standard must be demonstrated on completion of a course of training?

*Radio buttons*

[ ]  Agree

[ ]  Agree with changes (please specify suggested changes below)

[ ]  Disagree (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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1. Do you agree that Schedule 3 is fit for purpose?

*Radio buttons*

[ ]  Agree

[ ]  Agree with changes (please specify suggested changes below)

[ ]  Disagree (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**General comments**

Do you have any general comments to add regarding the proposed amendments to Schedule 3 of the Part 61 Manual of Standards to support implementation of the flight operations rules and to ensure it is fit for purpose?

Please include in these comments any impact this change may have on you or your operation which has not already been covered in this consultation.

Comment

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