



Australian Government  
Civil Aviation Safety Authority

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## SUMMARY OF PROPOSED CHANGE

# Recognition of foreign aircraft maintenance engineer licences from recognised States

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### Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

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# 1 Introduction

Aviation demand has returned strongly following the lifting of global COVID-19 travel restrictions.

Industry stakeholders have reported difficulties filling key roles including licensed aircraft maintenance engineers (LAME). The critical shortage of LAMEs has highlighted the need for new and innovative approaches to find, attract and retain, qualified aircraft maintenance personnel in Australia.

The Civil Aviation Safety Authority (CASA) has a pivotal role in overseeing the regulatory requirements for aircraft maintenance personnel licensing and the training systems for aircraft maintenance engineers.

One potential solution to alleviating the skills shortage in Australia is to facilitate opportunities for foreign aircraft maintenance licence holders to work in Australia by improving the efficiency of licensing outcomes.

Existing legislation in Part 66 of the *Civil Aviation Safety Regulations 1998* (CASR) provides for CASA to grant a Part 66 licence in recognition of a foreign aircraft maintenance engineer licence that was issued by a recognised State. CASA intends to implement that Part 66 legislation; however, no foreign States have been recognised for the purpose of this legislation. For a State to be recognised for Part 66 of CASR, the State must be specified as a recognised State in the Part 66 Manual of Standards (MOS). Holders of licences from non-recognised States will still be able to obtain an Australian licence via the current Part 147 Maintenance Training Organisation (MTO) arrangements.

Legislation does not specify requirements or criteria for recognition of a State; however, CASA has commenced development of a framework for assessing a foreign State for recognition for the purposes of Part 66 of CASR (the framework). The framework will ensure that a State may be recognised for Part 66 of CASR only if the State has a licensing system that is acceptable to CASA in consideration of Australia's licensing system and that it complies with Annex 1 to the Convention on International Civil Aviation - Personnel Licensing (ICAO Annex 1) requirements.

CASA has implemented the proposed framework for the assessment of an initial tranche of States. The successful assessment of those States according to the framework provides a basis for a proposed amendment to the Part 66 MOS to specify the States as recognised States.

The changes being proposed by CASA and for which comments are invited by this consultation are:

- development of the framework to be used by CASA for assessing foreign States for recognition for Part 66 of CASR
- amendment of the Part 66 MOS to include as recognised States, the initial tranche of States that have been assessed by CASA according to the framework, including information for individuals who may apply for recognition of a foreign licence issued by a recognised State.

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## 2 Reference material

### 2.1 Acronyms

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

**Table 1: Acronyms**

Acronym	Description
BCAR	<i>British Civil Airworthiness Requirements</i>
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
FAA	Federal Aviation Administration of the United States of America
ICAO	International Civil Aviation Organization
ICAO Annex 1	Annex 1 to the Convention on International Civil Aviation - Personnel Licensing
LAME	licensed aircraft maintenance engineer
NAA	National Aviation Authority
SARP	standards and recommended practices (ICAO)
USA	United States of America
USOAP	universal safety oversight audit programme (ICAO)

### 2.2 References

#### Legislation

Legislation is available on the Federal Register of Legislation website <https://www.legislation.gov.au/>

**Table 2: Legislation references**

Document	Title
CASR	<i>Civil Aviation Safety Regulations (1998)</i>
Part 66 Manual of Standards (MOS)	Continuing airworthiness aircraft engineer licences and ratings

## International Civil Aviation Organization documents

International Civil Aviation Organization (ICAO) documents are available for purchase from <http://store1.icao.int/>

Many ICAO documents are also available for reading, but not purchase or downloading, from the ICAO eLibrary (<https://elibrary.icao.int/home>).

**Table 3: ICAO references**

Document	Title
Annex 1	Personnel Licensing
Doc 7192	Training Manual Part D-1 Aircraft Maintenance (Technician/Engineer/Mechanic)
Doc 9379	Manual of Procedures for Establishment and Management of a State's Personnel Licensing System

## **3 Purpose and scope of the proposed amendments**

### **3.1 Foreign State assessment framework**

- 3.1.1 The legislation for granting a Part 66 licence based on recognition of a foreign licence from a recognised State has existed for some time; however, no States are currently recognised in legislation for this purpose.
- 3.1.2 CASA is developing a framework to assess a foreign State to provide a basis for recognition of the State for Part 66 of CASR.
- 3.1.3 To recognise a foreign State for Part 66 of CASR, the State must be specified as a recognised State in the Part 66 MOS.
- 3.1.4 The reason for recognising a State for Part 66 of CASR is so that individuals who hold a foreign aircraft maintenance engineer licence that is in force, and that was issued by a recognised State, may apply to CASA for a Part 66 licence. The granting of the Part 66 licence would be based on recognition of the foreign licence and would be subject to the applicant completing minimum additional requirements. This process will be quicker and more efficient than the current Part 147 MTO assessment arrangements.
- 3.1.5 A foreign State assessment framework is being developed to specify requirements, or criteria, for the recognition of a State. The proposed framework will be published by CASA as a controlled internal document including relevant assessment forms and guidance to assist CASA personnel to carry out assessments when required.

### **3.2 Recognition of foreign States for Part 66 of CASR – Singapore, the United Kingdom and the United States of America**

- 3.2.1 CASA is proposing an amendment to the Part 66 MOS to specify Singapore, the United Kingdom (UK) and the United States of America (USA) as recognised States for the purposes of regulation 66.030 of CASR.
- 3.2.2 Recognition of the 3 States will allow individuals that hold an aircraft maintenance engineer licence that is in force and that was issued by the National Aviation Authority of Singapore, the UK or the USA to apply to CASA for a Part 66 licence. The grant of a Part 66 licence would be based on recognition of the foreign licence and is subject to the applicant completing minimum additional requirements.
- 3.2.3 The proposal to recognise Singapore, the UK and the USA is based on the results of CASA's assessment of the 3 States according to the assessment framework that CASA is developing for this purpose.



## 4 Key change proposals

### 4.1 Key change 1 - Development of a framework to assess a foreign State for recognition for Part 66 of CASR

#### 4.1.1 Purpose of the framework

- 4.1.1.1 The framework will set out how CASA will assess a foreign State for recognition for the purposes of Part 66. If a State passes assessment according to the framework, it will be specified as a recognised State in the Part 66 MOS, subject to consultation on the legislative amendment.
- 4.1.1.2 Recognising a State for Part 66 of CASR will allow CASA to exercise existing regulation 66.030 of CASR which allows CASA to grant a Part 66 licence in recognition of a foreign licence that was issued by the recognised State and that is in force. Under the legislation an applicant for a Part 66 licence would be taken to meet most of the requirements for issue of the licence based on their foreign licence training. However, they would still need to meet other minimum requirements including requirements relating to age, English language proficiency, recency of experience, and knowledge of Australian aviation legislation.

#### 4.1.2 Development of the framework

- 4.1.2.1 To assist in implementing the existing recognised State foreign licence recognition pathway, CASA commissioned an external report on a robust framework for the exercise of this power. The final report, issued in 2024, considered a framework for recognising a foreign State as a recognised State and for assessing the holder of a licence from a recognised foreign State for the issue of an Australian licence.
- 4.1.2.2 CASA's development of the proposed framework for assessing a foreign State for recognition for Part 66 of CASR is based on recommendations in the external report and will ensure that Australia's safety standard in regard to maintenance personnel licensing is maintained.
- 4.1.2.3 The framework is not intended to ensure that the foreign State's licensing and training requirements are identical to Part 66 requirements; however, it will ensure that the maintenance licensing standards of a recognised State are acceptable to CASA when compared with Part 66 licensing standards and complies with ICAO Annex 1. Not all foreign States would be recognised following assessment under the framework.
- 4.1.2.4 Due to the need for the framework to be able to identify and evaluate the foreign licensing standards that were the basis for issue of a foreign licence, CASA does not intend to recognise a foreign licence that is not in force at the time of application, and the assessment framework has not been developed for that purpose.

#### 4.1.3 Elements of the framework

- 4.1.3.1 An expanded description of the assessment framework is included at Appendix A.
- 4.1.3.2 The assessment of a State set out in the framework requires CASA to assess the following elements against broad acceptance criteria:
- access to maintenance licensing legislation
  - NAA governance and regulatory oversight
  - licensing standards including requirements for knowledge, experience, training and examination



- consideration for legacy licence standards and foreign licence recognition by the State.

4.1.3.3 If the assessment of the foreign State identifies a substantial deficiency in the State's licensing standards relating to a knowledge requirement, the framework may allow recognition of the State. However, CASA would require an applicant for a Part 66 licence, based on recognition of licence from that State, to provide evidence that they have passed any relevant additional knowledge exam(s) at the time of application. An example of this provision within the framework is that licence applicants will be required to have passed exams on knowledge of Australian aviation legislation.

## 4.1.4 Implementation of the framework

- 4.1.4.1 The assessment framework will be published by CASA as a controlled internal document and will include relevant assessment checklist(s) to assist CASA personnel to perform assessments according to the framework.
- 4.1.4.2 The framework will be, as required, used to assess foreign States identified by CASA or, where agreed upon by CASA, foreign States proposed by industry stakeholders such as aircraft operators, maintenance organisations or individuals<sup>1</sup>.
- 4.1.4.3 If a foreign State is successfully assessed, CASA will prepare and recommend an amendment to the Part 66 MOS and will undertake the required consultation for the amendment. The proposed amendment will include the name of the recognised State and any information for applicants regarding any knowledge tests<sup>2</sup> that may be required to be completed at the time of application.
- 4.1.4.4 The privileges of any Part 66 licence that is issued in recognition of a foreign licence issued by a recognised State, will not exceed the privileges of the applicant's foreign licence and therefore the Part 66 licence may be issued with licence exclusions. An applicant for the Part 66 licence will need to pay the relevant application fee.
- 4.1.4.5 CASA will also develop the necessary application forms and guidance material for individuals who may wish to apply for a Part 66 licence based on recognition of a foreign licence issued by a recognised State and that is in force at the time of application.

## 4.1.5 ICAO requirements

### ICAO Annex 1

- 4.1.5.1 The International Civil Aviation Organization (ICAO) standards and recommended practices (SARP) for States in relation to maintenance personnel licensing are set out in chapter 4 of ICAO Annex 1.
- 4.1.5.2 Section 4.2 of ICAO Annex 1 sets out in broad terms the requirements that a contracting State should include in its legislated requirements for the issue of an aircraft maintenance engineer licence. These include requirements for:
- minimum age of a licence holder
  - knowledge requirements for:
    - air law and airworthiness requirements
    - natural science and aircraft general knowledge
    - aircraft engineering

<sup>1</sup> CASA may also use the framework to review a previously recognised State for continuing recognition for Part 66.

<sup>2</sup> Such knowledge tests may be required under regulation 11.035 of CASR and would include, for example, tests in relation to Australian aviation legislation.

- aircraft maintenance
    - human performance.
  - experience
  - training
  - skill.
- 4.1.5.3 Additional ICAO guidance for a contracting State's maintenance licensing training requirements is provided in ICAO Doc 7192 'Training Manual Part D-1 Aircraft Maintenance (Technician/Engineer/Mechanic)'.
- 4.1.5.4 Australia's requirements for the grant of a Part 66 licence as set out in the Part 66 MOS comply with the ICAO SARPs and guidance mentioned above.
- 4.1.5.5 When assessing the acceptability of a foreign State's licensing standards according to the proposed framework, CASA will evaluate the foreign State's licensing requirements against Part 66 requirements and, where necessary, against the applicable ICAO SARPs and guidance information.

## Conversion of licence

- 4.1.5.6 ICAO Doc 9379 'Manual of Procedures for Establishment and Management of a State's Personnel Licensing System' addresses three methods of issuance of licences and ratings prescribed by Annex 1 by contracting States: direct issuance, conversion and validation.
- 4.1.5.7 The provision of existing regulation 66.030 of CASR to grant a Part 66 licence based on recognition of a licence issued by a recognised State is consistent with licence conversion as described in ICAO Doc 9379.
- 4.1.5.8 Neither the existing legislation nor the proposed framework call for CASA to make an arrangement with the recognised State in regard to relying on the other State's licensing system – being one method proposed in the ICAO guidance. However, the assessment elements of the proposed framework together with existing requirements for granting a licence based on recognition of a licence from a recognised State, are consistent with the ICAO guidance for establishing processes for conversion of a licence.

## 4.2 Key change 2 – Amendment of the Part 66 Manual of Standards to specify Singapore, the United Kingdom and the United States of America as recognised States for regulation 66.030 of CASR

### 4.2.1 Reason for recognition

- 4.2.1.1 Recognition of Singapore, the UK and the USA will allow individuals that hold an aircraft maintenance engineer licence that is in force and that was issued by the National Aviation Authority of one of the States to apply to CASA for an equivalent Part 66 licence based on recognition of the foreign licence.
- 4.2.1.2 Applicants would be required to complete minimum additional requirements such as requirements relating to age, recency of experience, English language proficiency, and knowledge of Australian aviation legislation.

## 4.2.2 Basis for recognition

- 4.2.2.1 In accordance with Part 3—Definitions for this Part, Parts 42, 66, 145 and 147 and Subparts 202.BA, 202.CG, 202.GE and 202.GG of the CASR Dictionary, *recognised State* means a foreign country specified as a recognised State in the Part 66 MOS.
- 4.2.2.2 Australian civil aviation legislation does not specify requirements or criteria for the recognition of a foreign State for Part 66 of CASR. However, as described above for Key change 1, CASA is developing a framework for the assessment of a foreign State to provide a basis for recognition of the State for Part 66 of CASR.
- 4.2.2.3 CASA has assessed Singapore, the UK and the USA in accordance with the proposed framework and the assessments support the proposed amendment to the Part 66 MOS to specify each State as a recognised State for regulation 66.030 of CASR. The assessments concluded that Singapore, the UK and the USA have aircraft maintenance licensing standards that are acceptable to CASA when compared to Part 66 licensing standards and that comply with ICAO Annex 1.
- 4.2.2.4 CASA's assessment of the UK identified the potential need for Part 66 licence applicants to have completed additional knowledge tests if their application is based on recognition of a UK BCAR Section L licence. Relevant applicants would be notified by CASA during the application process of the additional requirements that may apply to their application.
- 4.2.2.5 CASA's assessment of the USA identified reduced scope of licence privileges of an FAA aviation mechanic certificate with airframe and/or powerplant ratings (FAA A&P certificate) compared to the privileges of a Part 66 licence. Therefore, CASA may not grant a Category B2 (Avionics) Part 66 licence in recognition of an applicant's FAA A&P certificate. Also, any Category B1 (Mechanical) Part 66 licence granted in recognition of an FAA A&P certificate may be endorsed with licence exclusions to ensure the licence accurately reflects the scope of maintenance privileges that are covered by the applicant's FAA certificate. For example, a B1 licence may be endorsed with exclusions in regard to aircraft electrical systems or powerplant systems.

## 4.2.3 Selection of States for recognition in this amendment

- 4.2.3.1 CASA's intention for the initial implementation of the framework was to assess States with differing licensing legislation. CASA selected Singapore and the UK for assessment because they have aircraft maintenance licensing legislation that is based on the EASA Part 66 regulations and is therefore similar to Australia's Part 66 legislation. The USA was selected for assessment as a State with licensing legislation that is non-EASA based and significantly different to Australia's legislation.
- 4.2.3.2 CASA also considered that there was reasonable likelihood of individuals holding licences from the selected States taking the opportunity to apply for an Australian Part 66 licence in recognition of their foreign licence where the opportunity is provided.

## 4.2.4 Consultation draft

- 4.2.4.1 For review as part of this consultation, CASA has prepared a consultation draft of the Part 66 MOS that shows the proposed amendments. The proposed amendments to the Part 66 MOS are:
- adding Singapore, the UK and the USA at Appendix V to specify the States as recognised States for the purpose of regulation 66.030 of CASR as provided for at section 66.A.60
  - including information about knowledge test requirements at Appendix V for applicants for a Part 66 licence based on recognition of a foreign licence issued by a recognised State.

## 5 Impact on industry

CASA considers that the ability to recognise foreign States for Part 66 of CASR based on assessment of the State according to the proposed framework, and the proposed recognition of Singapore, the UK and the USA, will provide significant benefit to the maintenance of aircraft within the Australian aviation industry.

Aircraft owners, operators and maintenance organisations are, over time, expected to have increased access to Part 66 licenced aircraft maintenance engineers. This is as a result of the enabling of an existing pathway for foreign licence holders to gain a Part 66 licence based on recognition of their foreign licence from a recognised State, subject to completing minimum additional knowledge requirements.

## 6 Safety risk analysis

CASA has carried out a thorough assessment of safety risk in regard to recognising a foreign State for the purpose of issuing a Part 66 licence based on recognition of a licence issued by the foreign State.

The risk assessment identified the need for the framework to be sufficiently robust to ensure that the maintenance licensing standards of a recognised State are acceptable based on Australia's Part 66 licensing standards and comply with ICAO Annex 1. The assessment also identified a range of specific risk controls that should be present within the framework and others that are present external to the framework such as controls within legislation or other regulatory or administrative process.

CASA will ensure that all identified risk controls considered necessary to provide appropriate, safe outcomes will be incorporated into the framework and associated arrangements.

## 7 Impact analysis

CASA believes that the proposed amendment to the Part 66 MOS will benefit the Australian aviation industry by enabling an existing pathway for foreign licence holders to gain a Part 66 licence, thereby increasing industry's access to licenced aircraft maintenance engineers.

CASA will engage with the Office of Impact Analysis (OIA) to prepare an Impact Analysis document if required regarding the proposed amendments.

## 8 Submitting your view and what next

We would like to hear your views on the amendments we have presented. Please review the proposal and provide your feedback and any additional concerns not covered in this SPC.

Your feedback will make a valuable contribution to CASA's policy decision-making process and help to fully inform CASA of the perceived impacts (positive and negative) on the aviation community regarding the proposal.

CASA will consider all comments received as part of this consultation process and incorporate changes as appropriate. Comments on this consultation should be submitted through the online response (CASA Consultation Hub) form by close of business 4 June 2025.



# Appendix A

## Framework for assessing a foreign State for recognition for the purposes of Part 66 of CASR

### A.1 Introduction

- A.1.1 This framework describes the assessment by CASA of a foreign State which, if successful, will provide a basis for CASA to recognise the State for Part 66 of CASR.
- A.1.2 In accordance with Part 3—Definitions for this Part, Parts 42, 66, 145 and 147 and Subparts 202.BA, 202.CG, 202.GE and 202.GG of the CASR Dictionary, *recognised State* means a foreign country specified as a recognised State in the Part 66 MOS.
- A.1.3 The recognition of a State enables implementation of existing legislation in Part 66 whereby a Part 66 licence may be issued to an applicant in recognition of a foreign licence issued by a recognised State. Under the legislation, the applicant is considered to meet most of the requirements for the licence and will still be required to meet other requirements including requirements relating to age, English language proficiency, recency of experience, and knowledge of Australian aviation legislation.

### A.2 Initiating assessment

- A.2.1 The assessment of a foreign State for recognition for Part 66 will be initiated by CASA in response to identified need to recognise aircraft maintenance engineer licences issued by particular States.
- A.2.2 CASA may also initiate a subsequent assessment of an existing recognised State to support continuing recognition of the State. Such assessment may be prompted by factors such as changes to a foreign State's civil aviation legislation or relevant feedback from the aviation industry.

### A.3 Assessment objective

- A.3.1 The objective of the assessment of a foreign State according to the framework is to determine if the maintenance licensing standards of the State are acceptable to CASA when compared with Part 66 licensing standards and that they comply with ICAO Annex 1.

### A.4 Foreign State assessment elements

#### A.4.1 Maintenance licensing legislation

- A.4.2 The foreign State's maintenance licensing legislation must be available from an official source in English language to permit CASA to assess the legislation.

### **A.4.3 Governance, regulatory compliance, oversight and enforcement**

- A.4.4 The foreign State must be an ICAO member state and must have acceptable ICAO Effective Implementation scores from ICAO Universal Safety Oversight Audit Programme (USOAP) audits in the areas of Legislation, Personnel Licencing and Airworthiness.
- A.4.5 The assessment will consider evidence that the National Aviation Authority (NAA) of the State exercises effective oversight in the form of compliance monitoring and enforcement of its legislative requirements including the requirements for maintenance licensing. The assessment will also consider the State's oversight of its maintenance licensing training and examination providers.

### **A.4.6 Licensing standards for equivalent licences**

- A.4.7 The assessment will evaluate the foreign State's licensing requirements including requirements for basic knowledge and practical experience. The foreign licensing requirements will be assessed against Australia's requirements set out in the Part 66 MOS for a license with equivalent privileges and scope.
- A.4.8 While the assessment may identify gaps in a foreign State's licence requirements compared to Part 66 requirements, not all gaps would prevent recognition of the State. The assessment will consider if such a gap represents a substantial deficiency with regard to required breadth and depth of aircraft maintenance knowledge and experience and ICAO Annex 1 requirements.
- A.4.9 If a substantial deficiency is identified in a foreign State's licensing standards, the framework may allow recognition of the State based on additional requirements licence applicants must satisfy at the time of application. That is, applicants for a Part 66 licence based on recognition of a foreign licence issued by the recognised State may be required to pass a knowledge test relevant to the deficiency. For example, all such applicants will be required at the time of application to provide evidence they have passed tests of knowledge of Australian aviation legislation.
- A.4.10 If a substantial deficiency in a foreign State's licensing standards cannot reasonably be addressed by requiring a licence applicant to have passed an additional knowledge test at the time of application, then CASA may find that the foreign State's licensing standards are not acceptable and therefore decide not to recognise the State.

### **A.4.11 Licensing standards for training, examination and assessments**

- A.4.12 The assessment will verify that the State's requirements for delivery of training and conduct of examinations and assessments are acceptable compared to Australian requirements.

### **A.4.13 Foreign licence – previous standards**

- A.4.14 The assessment will consider if the State had previous licensing standards that were used to issue licences that may still be in force in the State. If so, consideration will be given to any transitional licensing requirements that the State has implemented and, if necessary and where possible, CASA will evaluate the previous licensing standard.

### **A.4.15 Foreign State's foreign licence recognition**

- A.4.16 The assessment will consider if the State issues aircraft maintenance licences based on recognition of another foreign State's licensing system. If so, CASA will evaluate the State's foreign licence recognition program to consider the effect of the program on the State's licensing standards to determine whether or not to recognise the State for Part 66 of CASR.

## A.5 Assessment outcome

- A.5.1 If the assessment of the foreign State indicates that the foreign State's licensing standards are acceptable to CASA and comply with ICAO Annex 1 based on the assessment criteria and guidance, then the CASA assessor will certify a statement to that effect.
- A.5.2 The completed assessment may then be used as a basis for CASA to prepare and recommend an amendment to the Part 66 MOS to specify the foreign State as a recognised State, subject to consultation on the proposed amendment.
- A.5.3 The amendment to the Part 66 MOS may also include information for Part 66 licence applicants regarding any additional knowledge tests that they may be required to have completed at the time of application.