



Australian Government
Civil Aviation Safety Authority

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SUMMARY OF PROPOSED CHANGE

Amendment to CAO 100.24 – Approval of Maintenance Permissions for Large RPA

Project number: MS 25/13

File ref: D25/341728

October 2025

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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.

Artwork: James Baban.

Introduction

CASA's RPAS and AAM Strategic Regulatory Roadmap includes a variety of initiatives including AA5: “progress the development of a fit for purpose continuing airworthiness policy for higher-risk RPAS”.

This includes consideration of maintenance personnel authorisations and continuing airworthiness management policies, through risk and outcome-based principals.

In collaboration with the industry and CASA co-chaired RPAS/AAM Roadmap Implementation Technical Working Group (TWG), an opportunity has been identified to reduce the administration and time associated with the maintenance authority application/approval process required for large RPA.

The intent of the proposed CAO amendment is to reduce administration and timeframes for applicants.

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Reference material

Acronyms

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

Table 1: Acronyms

Acronym	Description
AC	advisory circular
CAO	Civil Aviation Order
CAR	<i>Civil Aviation Regulations 1988</i>
CASA	Civil Aviation Safety Authority
CASR	Civil Aviation Safety Regulations 1998
DAS	Director of Aviation Safety
RPA	remotely piloted aircraft

Definitions

Terms that have specific meaning within this SPC are defined in the table below. Where definitions from the civil aviation legislation have been reproduced for ease of reference, these are identified by 'grey shading'. Should there be a discrepancy between a definition given in this SPC and the civil aviation legislation, the definition in the legislation prevails.

Table 2: Definitions

Term	Definition
airworthiness authority	defined in regulation 2 of CAR as meaning an authority under regulation 33B of CAR.
maintenance authority	an airworthiness authority issued to carry out maintenance on aircraft.
large RPA	Defined in CASR 101.022 as: (a) a remotely piloted aeroplane with a gross weight of more than 150 kg; or (b) a remotely piloted powered parachute with a gross weight of more than 150 kg; or (c) a remotely piloted rotorcraft with a gross weight of more than 150 kg; or (d) a remotely piloted powered-lift aircraft with a gross weight of more than 150 kg; or (e) a remotely piloted airship with an envelope capacity of more than 100 m3.

References

Legislation

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

Table 3: Legislation references

Document	Title
The Act	Civil Aviation Act 1988
CAO 100.23	Civil Aviation Order 100.23 (Airworthiness Authorities — General) Instrument 2007
CAO 100.24	Civil Aviation Order 100.24 (Maintenance Authority) Instrument 2007.
CASR 101.265	Civil Aviation safety Regulation 101.265 Large RPA—persons permitted to carry out maintenance
CAR Part 4A	Civil Aviation Regulations Part 4A - Maintenance
CAR 33B	Civil Aviation Regulations 33B - Airworthiness authorities

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 4: ICAO references

Document	Title
ICAO Annex 1	Personnel Licensing
ICAO Annex 8	Airworthiness of aircraft

Advisory material

CASA's advisory materials are available at <https://www.casa.gov.au/publications-and-resources/guidance-materials>

Table 5: Advisory material references

Document	Title
AC 101-01	Remotely piloted aircraft systems - licensing and operations (Section 7)

Forms

CASA's forms are available at <http://www.casa.gov.au/forms>

Table 6: Forms

Form number	Title
350	Application for Initial Issue or Amendment to Scope of a Maintenance Authority

Purpose and scope of the proposed amendments

The intent of the proposed Civil Aviation Order (CAO) amendment is to reduce administration and timeframes for applicants.

Regulation 101.260 of CASR specifies that a large RPA (>150 kg) must be maintained as a Class B aircraft, under Part 4A of CAR. Regulation 101.265 of CASR, stipulates that an airworthiness authority is required to carry out maintenance, requiring a maintenance permission under 33B of CAR and the associated CAO 100.24.

Under CAO 100.24 the Director of Aviation Safety (DAS) must approve each maintenance authority if the applicant is not a holder of a Part 66 AME licence.

It is proposed that CAO 100.24 is amended to devolve the approval to a more appropriate level of delegation within CASA's Regulatory Oversight Division, at which relevant information on the scope and risks of the intended operation of large RPA is known and is being assessed, enabling a well-considered and more efficient assessment of the maintenance authority application.

This update will be further detailed within the associated guidance material at AC 101-01, and CAO 100.23 will also be updated accordingly.

Key change proposals for proposed Civil Aviation Order 100.24 (Maintenance Authority) Instrument 2007

Key change 1

Amendment of existing Paragraph 1.1 and subsequent insertion at 1.1A, to the effect that Paragraph 1.1 does not apply to an applicant for a maintenance authority that is for maintenance on RPA.

This proposed change to CAO 100.24 is intended to reduce administration and timeframes for large RPA applicants.

Please refer to the Consultation Draft of the proposed CAO.

Key change 2

We will modernise language to use gender neutral terminology, remove obsolete application forms and CAO references and modernise application submission methods within CAO 100.23 and 100.24.

Please refer to the Consultation Draft of the proposed CAO.

Key change 3

CASA is also updating the guidance material within AC 101-01 - Remotely piloted aircraft systems - licensing and operations.

In relation the key changes within this consultation, the contents of AC 101-01 Section 7 will be updated to include and support CAO 100.24.

Please refer to Appendix A of this SPC for the proposed guidance.

Previous consultations

This is the first public consultation on the proposed amendments.

In the development of the proposal, the concept was introduced to industry during a RPAS and AAM Strategic Regulatory Roadmap industry session webinar in early 2025, encouraging industry to provide relevant personal experiences and input through AAM/RPAS Roadmap Implementation TWG members.

CASA discussed this feedback in more detail with the TWG, who provided support for an outcome-based approach to ensuring the competency of maintenance personnel, in a practical manner, proportionate to the RPA and the risk level of its operation under Specific Operations Risk Assessment (SORA), without necessarily requiring a Part 66 LAME and without the additional time factor for case-by-case DAS approvals.

CASA has since drafted the proposed CAO amendments for broad consultation.

Impact on industry

CASA considers that these amendments will have a positive effect on industry by improving administrative efficiency during the application process for maintenance authorities relating to large RPA.

It is intended to provide for an administrative alleviation to the growing number of large RPA operation industry applicants, in terms of reducing the timeframes associated with administrative processes.

Safety risk analysis

This proposal affects only the delegation for issue of the maintenance authority, not the current competency standards required for the authority. The delegation is currently set at the highest level (DAS).

The scope of each maintenance permission is clearly defined and limited to the specific the circumstances. For any maintenance authority to be issued, all applicants must demonstrate appropriate competencies for that specific aircraft, for example, appropriate for large RPA.

Under the proposed CAO amendment, these settings remain as per the current competency standards but will be assessed and approved within CASA at a more efficient regulatory oversight level.

Broad industry input was requested during an RPAS and AAM Strategic Regulatory Roadmap industry session webinar, and the concept was then considered appropriate by the AAM/RPAS TWG.

Outcomes of the proposed CAO amendments will inform future, broader amendments to the continuing airworthiness requirements under CASR Part 101 as operations in this sector evolve. This amendment would benefit the current small volume of large RPA operators.

Impact analysis

CASA considers that the amendments to improve the administration of maintenance authorities for large RPA will have the impact of reducing wait times for industry and maintain safety.

CASA will prepare and submit a Preliminary Assessment to the Office of Impact Analysis (OIA) and prepare an Impact Analysis document if required.

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 18 November 2025.

Appendix A

Proposed updated guidance within AC 101-01 to support large RPA applicants under CAO 100.24

A.1 Authorised maintenance personnel

- A.1.1 In support of the amendment to CAO 100.24, Advisory Circular (AC) 101-01, Section 7 will be amended to include additional guidance on the principal change.
- A.1.2 Personnel performing maintenance on a large RPA require a maintenance authority to certify that maintenance under CAR 33B. Applicants for maintenance authorities are made via CASA Form 350 and with reference to CAO 100.24 which sets out maintenance competency requirements for approval of the application.
- A.1.3 For unique or novel operations of large RPA, CASA recommends organisations contact CASA during the operational application process to determine the scope of the proposed operation and therefore proportionate maintenance/personnel requirements, noting that Specific Operations Risk Assessment (SORA) is the formal risk assessment process used for RPA operations.
- A.1.4 A CASR Part 66 aircraft maintenance licence is the default requirement in Australia for the certification of aircraft maintenance and underpins the issue of maintenance permissions under CAO 100.24. However, for large RPA there is scalability available to recognise alternative competencies outside of the conventional Part 66 AME licence pathway. For a maintenance authority, all applicants must demonstrate appropriate competencies for that specific aircraft.
- A.1.5 For large RPA, CASA can accept a Part 66 licence or alternative means of establishing competencies such as RPA manufacturer training courses, formal maintenance training, foreign or military RPA maintenance permissions, coupled with appropriate large RPA maintenance experience in the context of the intended large RPA operations as assessed under SORA.
- A.1.6 It is also expected that the applicant's competency remains current and that this is demonstrated by the applicant.