

OFFICIAL



Australian Government

Civil Aviation Safety Authority

SUMMARY OF CONSULTATION

Proposed Part 101 of CASR miscellaneous amendments 2026

Project number: US 21/02

File ref: D26/465505

October 2026

OFFICIAL



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.

Contents

2	Reference material	5
2.1	Acronyms	5
2.2	Definitions	5
2.3	References	5
3	Respondents	6
4	Consultation feedback	8
4.1	NOTAM publication	8
4.2	Record keeping and information requirements	9
4.3	Aeronautical knowledge examinations	9
5	Future direction	12

Use of artificial intelligence

Artificial intelligence (AI) tools were used to assist with drafting, editing, summarisation, information synthesis and document structuring activities undertaken on this document. Any AI generated content included in this document, or used as an input to the review process, has been reviewed, validated and refined by a human and has not been relied upon as a substitute for evidence gathering, analysis, findings or recommendations.

1 Overview

From 6 August to 3 September 2026, CASA consulted on proposed miscellaneous amendments to Part 101 of the *Civil Aviation Safety Regulations 1998* (CASR). The consultation focused on 3 proposals:

- introducing a risk-based approach to determine when a Notice to Air Missions (NOTAM) is required for an area approval
- relocating the record keeping and information requirements to Subpart 101.C, without changing the existing requirements in the Part 101 Manual of Standards (MOS)
- enabling CASA to set and manage nationally consistent aeronautical knowledge examinations, delivered through CASA approved providers.

The proposed amendments form part of CASA's response to the post implementation review of Part 101 of CASR and the Part 101 MOS.

CASA received 71 submissions. Overall, respondents supported the objectives of the 3 proposals, while identifying matters for further consideration in their implementation.

There was broad support for a risk-based approach to NOTAM publication. Feedback recognised the potential to reduce unnecessary NOTAMs, while emphasising the need for clear and consistent criteria to maintain awareness of operations that may interact with crewed aircraft.

Most respondents did not expect the record keeping amendment to have unintended impacts. Comments provided generally reflected an understanding that the proposal would align the regulations with the existing MOS requirements rather than change current obligations.

Respondents also generally supported nationally consistent aeronautical knowledge examination standards. Views differed on examination delivery, particularly in relation to access, cost, examination integrity, regional and remote availability, the role of existing training organisations and transition arrangements.

2 Reference material

2.1 Acronyms

Table 1: Acronyms

Acronym	Description
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
MOS	Manual of Standards
NOTAM	Notice to Air Missions
ReOC	remotely piloted aircraft operator's certificate
RePL	remote pilot licence
RPA	remotely piloted aircraft
RPAS	remotely piloted aircraft systems

2.2 Definitions

Table 2: Definitions

Term	Definition
area approval	An approval issued by CASA under regulation 101.030 of CASR for an area in which uncrewed aircraft or rockets may be operated.
enabling provision	A provision in the regulations that enables detailed requirements to be prescribed by the MOS.

2.3 References

Table 3: Legislation

Document	Title
CASR	<i>Civil Aviation Safety Regulations 1998</i>
Part 101 MOS	<i>Part 101 (Unmanned Aircraft and Rockets) Manual of Standards 2019</i>

3 Respondents

CASA received 71 submissions, comprising of 46 (65%) organisational responses and 25 (35%) personal responses.

Table 4: Groups selected by respondents

Selected group	Number	Percentage
ReOC / RePL holder	30	42%
RPAS training organisation	11	15%
Other	9	13%
RePL holder	7	10%
State or territory government	5	7%
University or education institution	3	4%
RPAS manufacturer / developer	2	3%
Excluded category and / or micro RPA operator	1	1%
Drone / model aircraft retailer	1	1%
Drone delivery service	1	1%
Component or system developer / supplier	1	1%
Total	71	100%

Note: Percentages have been rounded to the nearest whole number and may not total 100% due to rounding.

The consultation responses to the 3 proposals are summarised in Table 1. The table provides an overview of respondents' views on the proposed changes to NOTAM publication, record keeping requirements and aeronautical knowledge examinations.

Table 5: Responses to the 3 proposal questions

Answer	NOTAM publication	Record keeping	Aeronautical knowledge examinations
Yes	43 (61%)	6 (8%)	33 (46%)
Yes, with changes	13 (18%)	Option not offered	20 (28%)
No	7 (10%)	38 (54%)*	15 (21%)

Answer	NOTAM publication	Record keeping	Aeronautical knowledge examinations
Undecided	5 (7%)	19 (27%)	0 (0%)
Not applicable	1 (1%)	6 (8%)	2 (3%)
Not answered	2 (3%)	2 (3%)	1 (1%)
Total	71 (100%)	71 (100%)	71 (100%)

Note:

Percentages have been rounded to the nearest whole number and may not total 100% due to rounding.

* For the record keeping proposal, 'No' means no unintended impacts were anticipated by respondent.

4 Consultation feedback

4.1 NOTAM publication

The proposal sought to introduce a risk-based approach to determine when a NOTAM is required for an area approval. Most respondents supported the proposal, with 56 (79%) of 71 respondents selecting 'Yes' or 'Yes, with changes'.

A more targeted approach to NOTAM publication

Many respondents supported a more targeted approach to NOTAM publication. They considered that this could reduce briefing workload and information overload, helping airspace users identify operationally important information.

Submissions also emphasised the importance of maintaining aviation safety. They noted that crewed aircraft can operate at low level, in Class G airspace, in remote areas and at short notice. Examples included emergency services, military activity, aerial work, mustering and other general aviation operations.

Several respondents considered NOTAMs an important situational awareness measure while electronic conspicuity and cooperative surveillance are not universal. Some submissions indicated a preference for NOTAM publication to remain the default, or to continue for all drone and rocket operations.

Clear and consistent decision making

Respondents consistently emphasised the need for clear and nationally consistent criteria for determining when a NOTAM is required. Suggested factors included operating height and duration, proximity to aerodromes and flight paths, airspace classification, the likelihood of low-level crewed aircraft, the dimensions of the approved area and other available risk controls.

Some respondents also sought greater clarity about how NOTAM decisions would be documented and communicated. Suggestions included recording whether a NOTAM is required in the area approval and maintaining a record of the basis for the decision. Feedback also noted that unclear criteria could lead operators to submit precautionary NOTAM requests, potentially limiting the intended benefits of the proposal.

Publication and communication processes

Respondents sought clarity about who would request or arrange NOTAM publication, applicable lead times, and how changes, cancellations and system outages would be managed. A respondent involved in rocketry asked how CASA would communicate a decision not to publish a NOTAM where an existing approval requires the operator to request one. Others asked whether operators could request a NOTAM as an additional risk control where CASA had not required one.

Other suggestions included better support for short notice operations, clearer presentation of location and height information, radius-based NOTAM formats, and improved visibility of RPAS NOTAMs in flight planning applications and aerodrome briefings. Some respondents also raised electronic conspicuity as a complementary or potential future means of improving situational awareness.

CASA response

CASA will consider the feedback received in finalising the proposal, including the aviation safety factors relevant to determining when a NOTAM is required and the need for clear and consistent decision making. This will include consideration of operations involving low level crewed aircraft and areas where electronic conspicuity is not widely available. CASA will also consider the practical issues raised about how NOTAM decisions are communicated and implemented.

In April 2026, CASA commissioned an aircraft equipage study to better understand current ADS-B equipage across the aviation sector. The study is expected to be released in late October 2026. Its findings will inform this work, including consideration of the role of electronic conspicuity in supporting situational awareness and future NOTAM arrangements. Other matters raised, such as flight planning displays, may require separate consideration with relevant organisations.

4.2 Record keeping and information requirements

The proposal sought to relocate the enabling provisions for record keeping and information requirements from Subpart 101.F to Subpart 101.C. Of the 71 respondents, 38 (54%) indicated that they did not anticipate unintended regulatory or operational impacts from the proposed change.

Alignment with existing requirements

Respondents were generally supportive of aligning regulations with the existing scope of Chapter 10 of the Part 101 MOS. Feedback reflected an understanding that the proposal would not change the existing record keeping and information requirements.

Some respondents sought confirmation that the amendment would not extend existing requirements to other categories of operation (including micro RPA and outdoor model aircraft) and considered that any future expansion of the requirements should be addressed separately.

Scope and application

Feedback also sought greater clarity about how the relocated provisions would apply to particular operations. Comments referred to indoor model aircraft and other indoor RPA operations, micro RPA used in commercial operations and model aircraft operated under an association framework.

Respondents also raised questions about who would be required to keep records and how the requirements would operate in practice. One submission highlighted the importance of records remaining connected to the operation and regulatory context in which they were created.

CASA response

CASA will consider the feedback received in finalising the proposal, including the need for clarity about the scope and application of the amended provisions. The proposal is intended to align the regulations with the existing Part 101 MOS and does not propose changes to the substantive record keeping requirements. Broader matters raised about operating categories, exclusions or future changes to record keeping requirements may require separate consideration.

4.3 Aeronautical knowledge examinations

The proposal sought to enable CASA to set and manage nationally consistent aeronautical knowledge examinations, delivered through CASA approved providers. There was broad support for the proposal, with 53 (75%) of 71 respondents selecting 'Yes' or 'Yes, with changes'.

Some respondents who selected 'No' supported nationally consistent examination standards but questioned aspects of the proposed delivery model.

Nationally consistent examination standards

Respondents generally supported nationally consistent examination standards. They considered that examinations set by CASA could reduce variation between training providers, provide greater confidence that candidates are assessed against the same minimum knowledge standard and reduce the need for individual providers to develop and maintain their own examination material.

Some submissions also considered that greater separation between training and examination could strengthen assessment integrity.

Other feedback indicated that the existing examination arrangements already provide appropriate controls or questioned whether there was sufficient evidence to justify changing the current approach. The proposal would not change the aeronautical knowledge candidates are expected to learn or the required standard of knowledge. Training providers would continue to teach the knowledge needed to meet the relevant requirements, whether the examination is set by a provider or CASA. An examination set by CASA is intended to provide a consistent approach to assessing that knowledge nationally.

Access and examination delivery

Respondents raised questions about how examinations would be delivered, particularly for candidates in regional and remote areas. They sought clarity on whether existing CASA approved training organisations could become approved examination providers or whether candidates would need to attend separate examination centres.

Feedback also highlighted the potential for additional travel and reduced access where training is delivered regionally, remotely, at client sites or within remote communities. Suggested alternatives included allowing approved training organisations to invigilate CASA examinations, secure online delivery and remote supervision.

Submissions also suggested measures to maintain examination integrity, including independent supervision, restricted access to examination questions, automated marking and audit arrangements. Some considered that national consistency could be achieved through a common syllabus, examination standard and appropriate security controls without requiring examinations to be delivered through centralised examination centres.

Cost and administrative impacts

Respondents identified potential examination fees and indirect costs, including travel, accommodation, rescheduling and disruption to existing training arrangements. Some training providers noted that separating examination and training activities could affect course delivery and viability.

Submissions also sought clarity about CASA fees and any charges imposed by examination providers. Feedback indicated that candidates could incur additional costs where assessment activities overlap with existing training arrangements.

Examination content and candidate feedback

Generally, respondents considered that examinations should assess practical aeronautical knowledge, understanding and decision making rather than primarily testing recall. Suggestions included clear learning outcomes, plain language, sample questions, appropriate training material and industry input into examination development.

Some submissions considered that examination content should reflect the knowledge relevant to the qualification and questioned whether organisational responsibilities of Remotely Piloted Aircraft Operator's Certificate (ReOC) holders and chief remote pilots should be included in an individual pilot examination.

Feedback also sought clear arrangements for knowledge deficiency reports, retraining, resits and disputed questions. Some respondents valued the existing connection between the theory examination, review of knowledge gaps and practical flight assessment and considered that this should be maintained under any new examination model. Others suggested reviewing mandatory theory contact hours if examinations are administered independently of training providers.

Transition and implementation

Respondents sought adequate lead time and clear transitional arrangements, including for candidates already enrolled or part way through training and the recognition of existing examination passes and qualifications.

Some submissions suggested trialling the new arrangements before national implementation, including across metropolitan, regional and remote locations. Training providers also sought clarity about how existing CASA approved examination material would be treated and about opportunities to contribute to implementation and post implementation review.

CASA response

CASA will consider the feedback received in finalising the proposal, including examination standards and content, delivery and supervision arrangements, access and cost impacts, the role of existing training organisations, and transition arrangements.

The proposed change is intended to establish a consistent national minimum knowledge standard and enable CASA to maintain examination content as operational and regulatory requirements evolve. It is not intended to change the role of CASA approved training organisations in delivering training or preparing candidates for examination. Training providers would retain flexibility in how they deliver training, while candidates would be assessed against the same minimum knowledge standard.

CASA will consider the practical issues raised about examination delivery, including access for candidates in regional and remote areas, supervision and examination security, candidate feedback and resits. Implementation will also consider appropriate examination arrangements for candidates with accessibility needs. The approach will seek to maintain appropriate access while supporting nationally consistent assessment and examination integrity.

The proposed RePL examination changes would not commence until 24 months after the legislative instrument is made and registered. This transition period is intended to provide time for CASA and training providers to make the necessary system, training and administrative changes and for further consultation with industry on examination standards, administration arrangements and associated amendments to the Part 101 MOS. Transition arrangements will also consider candidates already enrolled or part way through training, including the treatment of existing examination passes and qualifications.

Any proposed RePL examination fee would be subject to separate cost recovery consultation before implementation. Broader matters raised about training requirements and other issues outside the scope of the proposal may require separate consideration.

5 Future direction

CASA will consider the consultation feedback in determining the final approach to the proposed amendments.

CASA will provide guidance and information, where needed, to support affected operators, training organisations and other airspace users to understand any final changes and commencement arrangements.