Part 43 - Maintenance of general aviation and aerial work aircraft (CD 1812SS)

Overview

The proposed new maintenance regulations for general aviation (GA) seek to meet an overarching objective of streamlining maintenance requirements, minimise regulatory burden and reduce costs while maintaining the high aviation standards expected by all Australians.

In August 2018 we conducted a consultation that asked respondents to identify current challenges they experienced in GA maintenance and opportunities to improve Australia's regulatory system. Respondents were also asked to consider how the United States (US), New Zealand (NZ), Europe, and Canada approach GA maintenance and comment on whether one or more of those regulation structures would be a suitable model for Australia.

An overwhelming 78 per cent of respondents indicated a preference for the United States – Federal Aviation Regulation’s (US-FARs) model. Of the 11 per cent of respondents who indicated a preference for the New Zealand Civil Aviation Regulations (NZ-CARs), most indicated the FARs as their second choice.

CASA has also conducted a detailed technical review of the US-FARs. CASA considers the US-FARs to be a well-established set of regulations, readily accepted by the FAA and US industry alike, with sound policies, clear requirements, scalability across a wide range of aircraft and operations, pathways for industry growth, and good safety outcomes that are historically slightly better than those in Australia.

A Technical Working Group (TWG) appointed by the Aviation Safety Advisory Panel met in September 2018, reviewed the consultation feedback and considered the policy options. As a result of the technical review and this industry consultation and engagement, the US-FARs have been confirmed as the best model on which to base the proposed new maintenance regulations for GA.

The proposed new rule set

The proposed new rules will apply to GA maintenance. GA covers all flying activity carried out by VH registered aircraft other than charter and air transport operations. This includes flying training, mustering, firefighting and emergency service operations, search and rescue, aerial surveying and photography, towing, and private flying.

Aircraft that are occasionally used in charter operations will continue to be maintained by a CAR 30

approval holder, regardless of other GA uses.

CASA will incorporate the adopted FAR regulations into the Civil Aviation Safety Regulations 1998 (CASR) with as little amendment as possible. CASA expects to create a new CASR Part 43, reflecting US-FAR Part 43.

Changes will only be made:

- where words, titles, phrases or legal terminology are incompatible with Australian legal terms
- to clarify the current FAR including removing ambiguity or uncertainty
- to make necessary formatting, paragraph structure and numbering changes
- to incorporate any differences to the proposed policy outcomes that have been consulted with the GA sector.

Principal changes that would occur

Under a new CASR part based on the US-FARs:

- no maintenance organisation approval would be required for carrying out maintenance of aircraft, engines or components other than propellers and instruments.
- a new individual authorisation—Inspection Authorisation (IA)—would be introduced
- CAR 30 approvals would be phased out
- CAR 30 organisations would have the option of continuing to do business under the licence privileges of licensed aircraft maintenance engineers or transitioning to a Part 145 Approved Maintenance Organisation (AMO) approval.
- annual or progressive inspections will form an essential component in the management of airworthiness of an aircraft.

Documents for review

A copy of the Summary of proposed policy CD 1812SS and other documents related to this consultation are provided below in the ‘Related’ section. This includes a downloadable Word copy and PDF of this consultation for ease of distribution and feedback within your organisation.

You can read the Summary of proposed policy CD 1812SS on screen by using the scroll bar or save it to your computer or mobile device using the popup options.

The Summary of proposed policy CD 1812SS, comprises three parts:

1. Summary of proposed policies

2. Appendix 1 - acceptable data, and
3. Appendix 2- relevant FAR extracts.

Appendices 1 and 2 are provided for reference purposes only. Hyperlinks throughout the summary document will take you to the relevant references in the appendices.

What happens next

Once the consultation has closed, we will register and review each submission received through the online response form. We will make all submissions publicly available on the Consultation Hub, unless you request that your submission remain confidential. We will also publish a summary of consultation which summarises the feedback received.

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/landing-page/consultation-process>* .

To be notified of any future consultations, you can subscribe to our **consultation and rulemaking mailing list** *<https://mailinglist.casa.gov.au/?p=subscribe&id=3>* .

Why we are consulting

This consultation is seeking feedback on the proposed policy to develop a tailored set of maintenance regulations for GA that will be based on the US-FARs.

In 2019, there will be a final consultation that will seek feedback on the draft regulations to ensure that they will work in practice as they are intended.

Closing date for comment

Comments on the draft **Part 43 of CASR - Maintenance of aircraft** should be submitted through the online response form by close of business **31 January 2019.**

Contents

Proposed policy - maintenance regulations for aircraft in private and aerial work operations

This consultation is seeking feedback on the proposed policy to develop a tailored set of maintenance regulations for GA that will be based on the US-FARs.

GA covers all flying activity carried out by VH registered aircraft other than charter and air transport operations. This includes flying training, mustering, firefighting, emergency service operations, search and rescue, aerial surveying and photography, towing, and private flying.

Aircraft that are occasionally used in charter operations will continue to be maintained by a CAR 30 approval holder, regardless of other GA uses.

If you are not familiar with the FARs we have extracted the relevant policy outcomes that will come into effect under the proposed changes.

The proposed policy contained in this consultation sets out the desired outcomes in 6 main topic areas and will provide a clear explanation of the responsibilities that will apply under the new regulations to:

- an aircraft operator
- a person doing maintenance and
- a pilot of an aircraft.

Fact-banks have been included throughout the survey for each policy topic to highlight significant matters that you should consider before providing a response.

The survey has been designed to give you the option to provide feedback on the survey in its entirety or to provide feedback on the policy topics applicable to you.

When you have completed the sections on which you wish to provide feedback, select the **'Finish'** button at the bottom right of this page.

Personal information

First name

(Required)

Last name

(Required)

Email address

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

Email

Do your views officially represent those of an organisation?

(Required)

Please select only one item

- ○ Yes
- ○ No

If yes, please specify the name of your organisation.

Which of the following best describes the group you represent?

Please select only one item

- ○ Aircraft owner/operator
- ○ Pilot
- ○ Maintenance engineer
- ○ CAR 30 approval holder
- ○ Other

Please specify if you have selected “Other”.

Consent to publish submission

In order to promote debate and transparency, 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 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.

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/landing-page/consultation-process>* .

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.

Principal changes

FACT BANK:

Principal changes that would occur under a new CASR part based on the FARs are:

Maintenance organisation approval

No maintenance organisation approval would be required for carrying out maintenance of aircraft, engines or components other than propellers and instruments. This would apply to all aircraft not engaged in air transport operations.

Note: Maintenance practices will not change, so existing businesses holding a maintenance organisation approval may continue to maintain aircraft, but without the need for a maintenance organisation approval from CASA. Maintenance could continue to be certified for and on behalf of the organisation by licence holders.

A person certifying maintenance must have established their competency to make that certification. This may be via their licence training or demonstrated under supervision as described in topic 4 of the summary of policy proposals.

A LAME would be able to carry out or supervise maintenance of aircraft, engines, components and systems within the scope of their licence

LAMEs would not be required to obtain type ratings to carry out maintenance of type rated aircraft under this proposed CASR

A person would not be permitted to supervise maintenance or modification or authorise return to service after maintenance or modification, any aircraft or component, unless the maintenance is a basic privilege of a licence or the person has established competency for the task by having:

- previously performed the task
- been trained in the task by an appropriately qualified person
  or
- satisfactorily performed the task under the supervision of another LAME who meets one of these requirements.

New individual authorisation

A new individual authorisation—Inspection Authorisation (IA) —would be introduced. Only IA holders would be able to certify completion of annual inspections and conformity of major modifications/repairs to approved data.

CAR 30 approvals phased out

CAR 30 approvals would be phased out during a transition period determined by the finalisation of Charter

Options for doing business

CAR 30 organisations would have the option of continuing to do business under the licence privileges of the certifying licensed aircraft maintenance engineer. Some CAR 30 approval holders may opt for transitioning to a Part 145 Approved Maintenance Organisation (AMO) approval. CASA is conducting a post implementation review of Part 145 with the intention of simplifying the legislation and improving its suitability for small organisations.

Annual inspections for airworthiness management of aircraft

Annual or progressive inspections will form an essential component in the management of airworthiness of an aircraft. The annual/progressive inspection will be carried out or supervised by an IA holder who will, as part of the inspection, determine that the aircraft remains in conformity with its approved type design as properly modified. Aircraft operating in flying training or aerial work will also be required to undergo 100-hour inspections.

Large aeroplanes or multi-engine turbine powered aeroplanes would be required to use a manufacturers inspection program, or a program approved by CASA

Discontinuation of second tier of AMO approval

CASA will not continue to legislate a second tier of AMO approval. Future AMO approvals will only be legislated under Part 145 of CASR

In all cases, aircraft maintenance carried out under existing CAR 30 aircraft maintenance organisation approvals would meet the standards of the new GA maintenance regulations. A business would therefore not need to change its maintenance practices upon commencement of the new regulations.

A business that that currently holds a CAR 30 maintenance organisation certificate would not lose privileges but would gain flexibility in that it would no longer be required to seek CASA approval to expand the range of aircraft or aeronautical products that it maintains, would no longer be subject to systems audits and no longer required to conduct internal audits.

Feedback on principal changes proposed.

Please provide any comments you may have on the principal changes proposed.

Policy topic 1 - responsibilities of the registered operator

Policy

A registered operator will be responsible for all aspects of maintaining an aircraft in an airworthy condition.

General

FACT BANK:

General

A registered operator (RO) would be responsible for ensuring that:

- the aircraft is maintained in an airworthy condition;
- the operational and emergency equipment necessary for an intended flight is serviceable; and
- the certificate of airworthiness of the aircraft remains valid
- all aircraft have an annual or progressive inspection schedule and that the aircraft is inspected in accordance with the schedule
- aircraft engaged in aerial work or flying training have both 100-hour and annual or progressive inspections
- aircraft have their altimeters, transponder and static pressure systems tested within the 24 months prior to a flight under IFR or in controlled airspace.
- mandatory maintenance requirements as specified in an airworthiness limitations section are complied with (see note below)
- components with a mandatory life limit are retired on or before their required retirement time
- if an aircraft is powered by a turbine engine, its components are retired in accordance aircrafts airworthiness limitations as approved by the certifying NAA
- a component that has reached its mandatory retirement period is removed from service and dealt with in such a manner as to prevent it being inadvertently returned to service
- a component that has reached its mandatory retirement period is not fitted to an aircraft that is to be operated for a flight
- a life limed component that has reached its life limit is controlled to prevent inadvertent reinstallation in a type certificated aircraft
- the aircraft weight and balance details are kept up to date and that flight manual instructions for correct loading are amended as required after repairs or modifications

The RO would also be required to:

- have maintenance carried out in accordance with this proposed Part
- placard inoperative instruments or equipment that are not necessary for an intended flight
- ensure compliance with applicable Part 39 ADs
- report major defects to CASA
- ensure that a certification authorising return to service after maintenance is made by an appropriately licensed person or an AMO

FACT BANK

FAR 91.403 - General

1. The owner or operator of an aircraft is primarily responsible for maintaining that aircraft in an airworthy condition, including compliance with part 39 of this chapter.
2. No person may perform maintenance, preventive maintenance, or alterations on an aircraft other than as prescribed in this subpart and other applicable regulations, including part 43 of this chapter.
3. No person may operate an aircraft for which a manufacturer's maintenance manual or instructions for continued airworthiness has been issued that contains an airworthiness limitations section unless the mandatory replacement times, inspection intervals, and related procedures specified in that section or alternative inspection intervals and related procedures set forth in an operations specification approved by the Administrator under part 121 or 135 of this chapter or in accordance with an inspection program approved under 91.409(e) have been complied with.
4. A person must not alter an aircraft based on a supplemental type certificate unless the owner or operator of the aircraft is the holder of the supplemental type certificate, or has written permission from the holder.

Please provide any comments you may have on the proposed policy.

Repairs, modifications, maintenance records and operation after maintenance.

Fact Bank *FAR 91.407 Operation after maintenance, preventive maintenance, rebuilding, or alteration*, has the relevant section applicable to this policy bolded for ease of identification.

FACT BANK:

Repairs and Modifications

A registered operator (RO) would be responsible for ensuring that:

- minor repairs or modifications are carried out in accordance with acceptable data (form of acceptable data TBD)
- major repairs or modifications are carried out in accordance with data approved under Part 21.

FACT BANK:

Appendix A and B of FAR Part 43

FACT BANK:

Draft list of acceptable data

- Type certificate data sheets.
- Foreign type certificate data sheets used for the issue of a type acceptance certificate.
- Type design data for type certificated products e.g. approved drawings issued by the type certificate holder.
- Design change data that support a design change approved under Part 21.
- Data approved by a form 337.
- Data provided by CASA or a recognised authority in an advisory circular or other advisory document.
- Airworthiness directives that give specific instructions for modification or repair.
- Supplemental type certificates or approvals issued by CASA or a recognised foreign NAA.
- Data giving specific instructions for modification or repair contained in a maintenance manual, repair manual, overhaul manual, continuing airworthiness document, service bulletin, or an equivalent provided by the manufacturer of the product for which it is to be used and which is listed in the type certificate or by reference in the type acceptance certificate i.e. data that has been approved for use by the type certificate holder**.**

  Note: *This includes data provided by the manufacturer of a component of a product where that component is a part of the approved type design of the product.*

- Data included in, and specific to the category of, an airworthiness certificate.

FACT BANK:

Maintenance records

A registered operator (RO) would be responsible for ensuring that:

- for the aircraft, a record of total flight time is kept up to date
- for each airframe, engine and adjustable propeller, a maintenance record is kept
- all maintenance is recorded in the maintenance records
- a certification is made in the maintenance records on completion of maintenance that the aircraft is being returned to service
- if an aircraft is sold, maintenance records are handed over to the person who purchases the aircraft
- all records are kept secure and intact
- records of inspections are kept until the next inspection is carried out
- records of component overhauls are kept until the next overhaul is carried out
- records for aircraft, engines, propellers, rotors and life limited components are kept for at least 90 days after an aircraft, engine, propeller or life limited component has been permanently withdrawn from service
- no person is allowed to operate an aircraft that has undergone maintenance or modification, unless a maintenance record entry required by these proposed regulations has been made, and it has been certified by a person authorised to do so under this Part.

FACT BANK:

FAR 91.417 - Maintenance records.

(a) Except for work performed in accordance with 91.411 and 91.413, each registered owner or operator shall keep the following records for the periods specified in paragraph (b) of this section:

(1) Records of the maintenance, preventive maintenance, and alteration and records of the 100-hour, annual, progressive, and other required or approved inspections, as appropriate, for each aircraft (including the airframe) and each engine, propeller, rotor, and appliance of an aircraft. The records must include—

(i) A description (or reference to data acceptable to the Administrator) of the work performed; and

(ii) The date of completion of the work performed; and

(iii) The signature, and certificate number of the person approving the aircraft for return to service.

(2) Records containing the following information:

(i) The total time in service of the airframe, each engine, each propeller, and each rotor.

(ii) The current status of life-limited parts of each airframe, engine, propeller, rotor, and appliance.

(iii) The time since last overhaul of all items installed on the aircraft which are required to be overhauled on a specified time basis.

(iv) The current inspection status of the aircraft, including the time since the last inspection required by the inspection program under which the aircraft and its appliances are maintained.

(v) The current status of applicable airworthiness directives (AD) and safety directives including, for each, the method of compliance, the AD or safety directive number and revision date. If the AD or safety directive involves recurring action, the time and date when the next action is required.

(vi) Copies of the forms prescribed by 43.9(d) of this chapter for each major alteration to the airframe and currently installed engines, rotors, propellers, and appliances.

(b) **The owner or operator shall retain** the following records for the periods prescribed:

(1) The records specified in paragraph (a)(1) of this section shall be retained until the work is repeated or superseded by other work or for 1 year after the work is performed.

(2) The records specified in paragraph (a)(2) of this section shall be retained and transferred with the aircraft at the time the aircraft is sold.

(3) A list of defects furnished to a registered owner or operator under §43.11 of this chapter shall be retained until the defects are repaired and the aircraft is approved for return to service.

(c) The owner or operator shall make all maintenance records required to be kept by this section available for inspection by the Administrator or any authorized representative of the National Transportation Safety Board (NTSB). In addition, the owner or operator shall present Form 337 described in paragraph (d) of this section for inspection upon request of any law enforcement officer.

(d) When a fuel tank is installed within the passenger compartment or a baggage compartment pursuant to part 43 of this chapter, a copy of FAA Form 337 shall be kept on board the modified aircraft by the owner or operator.

FACT BANK:

Operation after maintenance

If the maintenance may have appreciably changed the flight characteristics of an aircraft, it is not flown with a person on board who is not a crew member until an appropriately rated pilot with at least a recreational private pilot licence flies the aircraft, makes an operational check of the maintenance performed or alteration made, and logs the flight in the aircraft records.

FACT BANK:

FAR 91.407 - Operation after maintenance

FAR 91.407 - Operation after maintenance, preventive maintenance, rebuilding, or alteration.

(a) No person may operate any aircraft that has undergone maintenance, preventive maintenance, rebuilding, or alteration unless—

1. It has been approved for return to service by a person authorized under 43.7 of this chapter; and
2. The maintenance record entry required by 43.9 or 43.11, as applicable, of this chapter has been made.

(b) No person may carry any person (other than crewmembers) in an aircraft that has been maintained, rebuilt, or altered in a manner that may have appreciably changed its flight characteristics or substantially affected its operation in flight until an appropriately rated pilot with at least a private pilot certificate flies the aircraft, makes an operational check of the maintenance performed or alteration made, and logs the flight in the aircraft records.

(c) The aircraft does not have to be flown as required by paragraph (b) of this section if, prior to flight, ground tests, inspection, or both show conclusively that the maintenance, preventive maintenance, rebuilding, or alteration has not appreciably changed the flight characteristics or substantially affected the flight operation of the aircraft.

Please provide any comments you may have on the proposed policy.

Policy topic 2 - Responsibilities of a maintainer

Policy

A maintainer who carries out an annual or a 100-hour or progressive inspection would be required to use a check list that meets the requirements set out in the associated MOS.

A LAME may not carry out or supervise maintenance of an aircraft or aeronautical product, unless he or she understands the current instructions of the manufacturer, and the maintenance manuals for the specific operation concerned.

FACT BANK:

Altimeter and ASI system tests

A maintainer carrying out a test of pitot/static pressure systems, altimeters and transponders would be **required** to carry out the tests in accordance with Appendix E and F of FAR 43.

FACT BANK:

Appendix E and F of FAR 43 - Altimeter and ASI system tests

FACT BANK:

Modifications

A maintainer who carries out a modification would be **required** to:

- carry out the modification ensuring compliance with the relevant approved or acceptable data as applicable
- enter details of the data used in the aircraft maintenance records. The details should provide sufficient information for another person to identify the actual data that was used for the work
- if a modification requires a change to the aircraft flight manual or additional or altered maintenance practices, ensure that the RO is advised of the requirement.

For a minor repair or alteration, a LAME may use data that is acceptable to CASA. No Part 21 approval would be required.

FACT BANK:

Appendix A to FAR Part 43

FACT BANK:

Draft list of acceptable data

- Type certificate data sheets.

- Foreign type certificate data sheets used for the issue of a type acceptance certificate.
- Type design data for type certificated products e.g. approved drawings issued by the type certificate holder.
- Design change data that support a design change approved under Part 21
- Data approved by a form 337.
- Data provided by CASA or a recognised authority in an advisory circular or other advisory document.
- Airworthiness directives that give specific instructions for modification or repair.
- Supplemental type certificates or approvals issued by CASA or a recognised foreign NAA
- Data giving specific instructions for modification or repair contained in a maintenance manual, repair manual, overhaul manual, continuing airworthiness document, service bulletin, or an equivalent provided by the manufacturer of the product for which it is to be used and which is listed in the type certificate or by reference in the type acceptance certificate i.e. data that has been approved for use by the type certificate holder**.**

  Note: *This includes data provided by the manufacturer of a component of a product where that component is a part of the approved type design of the product.*
- Data included in, and specific to the category of, an airworthiness certificate.

Please provide any comments you may have on the proposed policy.

Policy topic 3 - Maintenance performance rules

Policy

A person performing maintenance will be required to ensure that the work is undertaken in such a manner to ensure the aircraft remains at least equal to its certification basis as properly altered.

Fact Banks:
FAR 43.13 - Performance rules (General) and
FAR 43.9 - Content, Form, and disposition of Maintenance Records
have the relevant sections applicable to this policy bolded for ease of identification.

FACT BANK:

General

A person performing maintenance would be required to use:

- methods, techniques and practices set out in appropriate maintenance instructions
- tools, equipment and test apparatus necessary to ensure that the work is completed in accordance with accepted industry practice
- carry out inspections and repairs in such a manner to ensure that the aircraft, engine, propeller, or aeronautical product being worked on will be at least equal to its originally certificated or properly modified condition.

If an ICA requires the use of a particular tool or test equipment, the maintainer would be required to use that item or an alternative tool that ensures the equivalent airworthiness outcome.

A LAME with the appropriate licence will be able to overhaul an engine, but would not be permitted to certify that an engine has been overhauled unless:

- it has been disassembled, cleaned, inspected, repaired as necessary, and reassembled in accordance with the manufacturer’s instructions and
- it has been tested in accordance with approved standards and technical data, which have been developed and documented by the holder of the type certificate, supplemental type certificate, or a material, part, process, or appliance approval under Part 21 of CASR.

Similar provisions will apply to overhauling of aeronautical products (excluding propellers and Instruments)

FACT BANK:

FAR 43.13 - Performance rules (General)

(a) Each person performing maintenance, alteration, or preventive maintenance on an aircraft, engine, propeller, or appliance shall use **the methods, techniques, and practices prescribed in the current manufacturer's maintenance manual or Instructions for Continued Airworthiness prepared by its manufacturer, or other methods, techniques, and practices acceptable to the Administrator,** except as noted in 43.16. He shall use the tools, equipment, and test apparatus necessary to assure completion of the work in accordance with accepted industry practices. If special equipment or test apparatus is recommended by the manufacturer involved, he must use that equipment or apparatus or its equivalent acceptable to the Administrator.

(b) **Each person maintaining or altering, or performing preventive maintenance, shall do that work in such a manner and use materials of such a quality, that the condition of the aircraft, airframe, aircraft engine, propeller, or appliance worked on will be at least equal to its original or properly altered condition** (with regard to aerodynamic function, structural strength, resistance to vibration and deterioration, and other qualities affecting airworthiness).

(c) Special provisions for holders of air carrier operating certificates and operating certificates issued under the provisions of Part 121 or 135 and Part 129 operators holding operations specifications. Unless otherwise notified by the administrator, the methods, techniques, and practices contained in the maintenance manual or the maintenance part of the manual of the holder of an air carrier operating certificate or an operating certificate under Part 121 or 135 and Part 129 operators holding operations specifications (that is required by its operating specifications to provide a continuous airworthiness maintenance and inspection program) constitute acceptable means of compliance with this section.

FACT BANK:

Weld repairs

A LAME would be permitted to return an aircraft to service after weld repair work was carried out if the repair work is a minor repair or modification.

If the weld repair is a major repair or modification, the work could only be released to service by the holder of an IA.

FACT BANK:

Recording maintenance

A person who carries out maintenance on an aircraft, engine or propeller, must make a record in the log book that contains:

- the date of the maintenance

- as applicable: aircraft, engine or propeller total time in service
- what maintenance has been done including as applicable
  - details of component changes
  - details of any life limited component changes including part/serial no as applicable
  - if a life limited component is changed, details of when the replacement component will be required to be removed from service
  - if a modification is involved, details of the data used
- a statement that the aircraft is released to service
- the name of the person who is authorising release to service
- the authorisation details of the person authorising release to service
- the signature of the person authorising the aircraft engine or propeller for release to service.

FACT BANK:

FAR 43.9 - Content, Form, and Disposition of Maintenance Records

(a) Maintenance record entries. Except as provided in paragraphs (b) and (c) of this section, **each person who maintains, performs preventive maintenance, rebuilds, or alters an aircraft, airframe, aircraft engine, propeller, appliance, or component part shall make an entry in the maintenance record of that equipment containing the following information:**

(1) A description (or reference to data acceptable to the Administrator) of work performed.

(2) The date of completion of the work performed.

(3) The name of the person performing the work if other than the person specified in paragraph (a)(4) of this section.

(4) If the work performed on the aircraft, airframe, aircraft engine, propeller, appliance, or component part has been performed satisfactorily, the signature, certificate number, and kind of certificate held by the person approving the work. The signature constitutes the approval for return to service only for the work performed.

(b) Each holder of an air carrier operating certificate or an operating certificate issued under Part 121 or 135, that is required by its approved operations specifications to provide for a continuous airworthiness maintenance program, shall make a record of the maintenance, preventive maintenance, rebuilding, and alteration, on aircraft, airframes, aircraft engines, propellers, appliances, or component parts which it operates in accordance with the applicable provisions of Part 121 or 135 of this chapter, as appropriate.

(c) This section does not apply to persons performing inspections in accordance with Part 91, 125, 135.411(a)(1), or 135.419 of this chapter.

(d) In addition to the entry required by paragraph (a) of this section, major repairs and major alterations shall be entered on a form, and the form disposed of, in the manner prescribed in appendix B, by the person performing the work.

FACT BANK:

Additional rules for inspections

Checklists

A checklist would be required to be used that meets the minimum standards set out in FAR Part 43 Appendix D. This would be a shared obligation; the RO would be required to have a checklist for the aircraft that complies with the minimum standards and the maintainer would be required to ensure that he or she carries out an inspection using an appropriate checklist.

FACT BANK:

FAR 43.15 - Additional Performance Rules for Inspections

(a) **General**. Each person performing an inspection required by part 91, 125, or 135 of this chapter, shall:

(1) Perform the inspection so as to determine whether the aircraft, or portion(s) thereof under inspection, meets all applicable airworthiness requirements; and

(2) If the inspection is one provided for in part 125, 135, or 91.409(e) of this chapter, perform the inspection in accordance with the instructions and procedures set forth in the inspection program for the aircraft being inspected.

(b) **Rotorcraft**. Each person performing an inspection required by Part 91 on a rotorcraft shall inspect the following systems in accordance with the maintenance manual or Instructions for Continued Airworthiness of the manufacturer concerned:

(1) The drive shafts or similar systems.

(2) The main rotor transmission gear box for obvious defects.

(3) The main rotor and center section (or the equivalent area).

(4) The auxiliary rotor on helicopters.

(c) **Annual and 100-hour inspections**.

(1) Each person performing an annual or 100-hour inspection shall use a checklist while performing the inspection. The checklist may be of the person's own design, one provided by the manufacturer of the equipment being inspected or one obtained from another source. This checklist must include the scope and detail of the items contained in appendix D to this part and paragraph (b) of this section.

(2) Each person approving a reciprocating-engine-powered aircraft for return to service after an annual or 100-hour inspection shall, before that approval, run the aircraft engine or engines to determine satisfactory performance in accordance with the manufacturer's recommendations of:

(i) Power output (static and idle r.p.m.);
(ii) Magnetos;
(iii) Fuel and oil pressure; and
(iv) Cylinder and oil temperature.

(3) Each person approving a turbine-engine-powered aircraft for return to service after an annual, 100-hour, or progressive inspection shall, before that approval, run the aircraft engine or engines to determine satisfactory performance in accordance with the manufacturer's recommendations.

(d) Progressive inspection.

(1) Each person performing a progressive inspection shall, at the start of a progressive inspection system, inspect the aircraft completely. After this initial inspection, routine and detailed inspections must be conducted as prescribed in the progressive inspection schedule. Routine inspections consist of visual examination or check of the appliances, the aircraft, and its components and systems, insofar as practicable without disassembly. Detailed inspections consist of a thorough examination of the appliances, the aircraft, and its components and systems, with such disassembly as is necessary. For the purposes of this subparagraph, the overhaul of a component or system is considered to be a detailed inspection.

(2) If the aircraft is away from the station where inspections are normally conducted, an appropriately rated mechanic, a certificated repair station, or the manufacturer of the aircraft may perform inspections in accordance with the procedures and using the forms of the person who would otherwise perform the inspection.

FACT BANK:

Type certificate compliance

The person carrying out the annual inspection would also be required to determine

that the aircraft remains in compliance with its certification basis as properly modified.

FACT BANK:

FAR 43.13 - Performance Rules (General)

(a) Each person performing maintenance, alteration, or preventive maintenance on an aircraft, engine, propeller, or appliance shall use the methods, techniques, and practices prescribed in the current manufacturer's maintenance manual or Instructions for Continued Airworthiness prepared by its manufacturer, or other methods, techniques, and practices acceptable to the Administrator, except as noted in 43.16. He shall use the tools, equipment, and test apparatus necessary to assure completion of the work in accordance with accepted industry practices. If special equipment or test apparatus is recommended by the manufacturer involved, he must use that equipment or apparatus or its equivalent acceptable to the Administrator.

(b) Each person maintaining or altering, or performing preventive maintenance, shall do that work in such a manner and use materials of such a quality, that the condition of the aircraft, airframe, aircraft engine, propeller, or appliance worked on will be at least equal to its original or properly altered condition (with regard to aerodynamic function, structural strength, resistance to vibration and deterioration, and other qualities affecting airworthiness).

(c) Special provisions for holders of air carrier operating certificates and operating certificates issued under the provisions of Part 121 or 135 and Part 129 operators holding operations specifications. Unless otherwise notified by the administrator, the methods, techniques, and practices contained in the maintenance manual or the maintenance part of the manual of the holder of an air carrier operating certificate or an operating certificate under Part 121 or 135 and Part 129 operators holding operations specifications (that is required by its operating specifications to provide a continuous airworthiness maintenance and inspection program) constitute acceptable means of compliance with this section.

FACT BANK:

Test running of engines after an inspection

Reciprocating engines

Before returning a piston engine powered aircraft to service after an annual or 100-hour inspection the person returning the aircraft to service would be **required** to run the aircraft engine or engines to determine satisfactory performance in accordance with the manufacturer's recommendations of—

- Power output (static and idle r.p.m)
- Magnetos

- Fuel and oil pressure and
- Cylinder and oil temperature.

Turbine engines

Before returning a turbine powered aircraft to service after an annual or 100-hour inspection, the person returning the aircraft to service would be **required** to run the aircraft engine or engines to determine that the engine is satisfactorily performing in accordance with the manufacturer's recommendations.

FACT BANK:

FAR 43.15 - Additional Performance Rules for Inspections

(a) **General**. Each person performing an inspection required by part 91, 125, or 135 of this chapter, shall—

(1) Perform the inspection so as to determine whether the aircraft, or portion(s) thereof under inspection, meets all applicable airworthiness requirements; and

(2) If the inspection is one provided for in part 125, 135, or 91.409(e) of this chapter, perform the inspection in accordance with the instructions and procedures set forth in the inspection program for the aircraft being inspected.

(b) **Rotorcraft**. Each person performing an inspection required by Part 91 on a rotorcraft shall inspect the following systems in accordance with the maintenance manual or Instructions for Continued Airworthiness of the manufacturer concerned:

(1) The drive shafts or similar systems.

(2) The main rotor transmission gear box for obvious defects.

(3) The main rotor and center section (or the equivalent area).

(4) The auxiliary rotor on helicopters.

(c) **Annual and 100-hour inspections**.

(1) Each person performing an annual or 100-hour inspection shall use a checklist while performing the inspection. The checklist may be of the person's own design, one provided by the manufacturer of the equipment being inspected or one obtained from another source. This checklist must include the scope and detail of the items contained in appendix D to this part and paragraph (b) of this section.

(2) Each person approving a reciprocating-engine-powered aircraft for return to service after an annual or 100-hour inspection shall, before that approval, run the aircraft engine or engines to determine satisfactory performance in accordance with

the manufacturer's recommendations of—

(i) Power output (static and idle r.p.m.);

(ii) Magnetos;

(iii) Fuel and oil pressure; and

(iv) Cylinder and oil temperature.

(3) Each person approving a turbine-engine-powered aircraft for return to service after an annual, 100-hour, or progressive inspection shall, before that approval, run the aircraft engine or engines to determine satisfactory performance in accordance with the manufacturer's recommendations.

(d) Progressive inspection.

(1) Each person performing a progressive inspection shall, at the start of a progressive inspection system, inspect the aircraft completely. After this initial inspection, routine and detailed inspections must be conducted as prescribed in the progressive inspection schedule. Routine inspections consist of visual examination or check of the appliances, the aircraft, and its components and systems, insofar as practicable without disassembly. Detailed inspections consist of a thorough examination of the appliances, the aircraft, and its components and systems, with such disassembly as is necessary. For the purposes of this subparagraph, the overhaul of a component or system is considered to be a detailed inspection.

(2) If the aircraft is away from the station where inspections are normally conducted, an appropriately rated mechanic, a certificated repair station, or the manufacturer of the aircraft may perform inspections in accordance with the procedures and using the forms of the person who would otherwise perform the inspection.

Please provide any comments you may have on the proposed policy.

Policy topic 4 - Who can perform or supervise maintenance and authorise a return to service

Policy

An aircraft may not be returned to service after maintenance, except in accordance with the requirements set out in this section.

The holder of at least a private pilot licence could perform maintenance that:

- is specified in **Appendix A of Part 43** as preventive maintenance for the purpose
- is carried out on an aircraft that the pilot is authorised to fly as pilot in command
- the pilot has been authorised to carry out by the registered operator.

The holder of a B1 licence in the appropriate subcategory could perform or supervise maintenance of an aircraft, engine, propeller or aeronautical product and return it to service after maintenance.

- B1 licence holders may perform or supervise maintenance of mechanical and structural systems of all aircraft under this part.
- A licensed aircraft maintenance engineer would not be able to supervise maintenance or authorise return to service of:
  - propellers after major repairs or modifications
  - instruments after any repair or modification.

A person would not be permitted to supervise maintenance or modification or authorise return to service after maintenance or modification, any aircraft or component unless the maintenance is a basic privilege of a licence or the person has satisfactorily completed the same type of maintenance:

- at an earlier date or
- under the direct supervision of an acceptable training provider or another appropriately rated licence holder who has had previous experience in the same type of maintenance.

FACT BANK:

FAR 43.7 - Persons Authorized to Approve Aircraft for Return to Service

(a) Except as provided in this section and 43.17, no person, other than the Administrator, may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service after it has undergone maintenance, preventive maintenance, rebuilding, or alteration.

(b) The holder of a mechanic certificate or an inspection authorization may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service as provided in Part 65 of this chapter.

(c) The holder of a repair station certificate may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service as provided in Part 145 of this chapter.

(d) A manufacturer may approve for return to service any aircraft, airframe, aircraft engine, propeller, appliance, or component part which that manufacturer has worked on under 43.3(j). However, except for minor alterations, the work must have been

done in accordance with technical data approved by the Administrator.

(e) The holder of an air carrier operating certificate or an operating certificate issued under Part 121 or 135, may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service as provided in Part 121 or 135 of this chapter, as applicable.

(f) A person holding at least a private pilot certificate may approve an aircraft for return to service after performing preventive maintenance under the provisions of §43.3(g).

(g) The holder of a repairman certificate (light-sport aircraft) with a maintenance rating may approve an aircraft issued a special airworthiness certificate in light-sport category for return to service, as provided in part 65 of this chapter.

(h) The holder of at least a sport pilot certificate may approve an aircraft owned or operated by that pilot and issued a special airworthiness certificate in the light-sport category for return to service after performing preventive maintenance under the provisions of 43.3(g).

FACT BANK:

Appendix A to Part 43

FACT BANK:

Return to service after a scheduled inspection

A LAME may return an aircraft to service after a 100-hour inspection.

A LAME must hold an IA to return an aircraft to service after an annual inspection. An IA holder would be permitted to return an aircraft to service after performing or supervising the performance of, an annual inspection.

FACT BANK:

FAR 43.7 - Persons Authorized to Approve Aircraft for Return to Service

(a) Except as provided in this section and 43.17, no person, other than the Administrator, may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service after it has undergone maintenance, preventive maintenance, rebuilding, or alteration.

(b) The holder of a mechanic certificate or an inspection authorization may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service as provided in Part 65 of this chapter.

(c) The holder of a repair station certificate may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service as provided in

Part 145 of this chapter.

(d) A manufacturer may approve for return to service any aircraft, airframe, aircraft engine, propeller, appliance, or component part which that manufacturer has worked on under 43.3(j). However, except for minor alterations, the work must have been done in accordance with technical data approved by the Administrator.

(e) The holder of an air carrier operating certificate or an operating certificate issued under Part 121 or 135, may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service as provided in Part 121 or 135 of this chapter, as applicable.

(f) A person holding at least a private pilot certificate may approve an aircraft for return to service after performing preventive maintenance under the provisions of 43.3(g)

(g) The holder of a repairman certificate (light-sport aircraft) with a maintenance rating may approve an aircraft issued a special airworthiness certificate in light-sport category for return to service, as provided in part 65 of this chapter.

(h) The holder of at least a sport pilot certificate may approve an aircraft owned or operated by that pilot and issued a special airworthiness certificate in the light-sport category for return to service after performing preventive maintenance under the provisions of 43.3(g).

FACT BANK:

Return to service after major repair or modification

An aircraft could only be returned to service after major modifications and repairs by a holder of an IA

FACT BANK:

FAR 65.95 - Inspection authorization: Privileges and limitations

(a) The holder of an inspection authorization may—

1. Inspect and approve for return to service any aircraft or related part or appliance (except any aircraft maintained in accordance with a continuous airworthiness program under part 121 of this chapter) after a major repair or major alteration to it in accordance with part 43 [New] of this chapter, if the work was done in accordance with technical data approved by the Administrator; and
2. Perform an annual or perform or supervise a progressive inspection according to 43.13 and 43.15 of this chapter.

(b) When he exercises the privileges of an inspection authorization the holder shall keep it available for inspection by the aircraft owner, the mechanic submitting the aircraft, repair, or alteration for approval (if any), and shall present it upon the request of the Administrator or an authorized representative of the National Transportation Safety Board, or of any Federal, State, or local law enforcement officer.

(c) If the holder of an inspection authorization changes his fixed base of operation, he may not exercise the privileges of the authorization until he has notified the responsible Flight Standards office or International Field Office for the area in which the new base is located, in writing, of the change.

FACT BANK:

Repairs and modifications to propellers

Major repairs and modifications to propellers could only be supervised and returned to service by an AMO.

FACT BANK:

FAR 65.81 - General privileges and limitations

(a) A certificated mechanic may perform or supervise the maintenance, preventive maintenance or alteration of an aircraft or appliance, or a part thereof, for which he is rated (but excluding major repairs to, and major alterations of, propellers, and any repair to, or alteration of, instruments), and may perform additional duties in accordance with 65.85, 65.87, and 65.95. However, he may not supervise the maintenance, preventive maintenance, or alteration of, or approve and return to service, any aircraft or appliance, or part thereof, for which he is rated unless he has satisfactorily performed the work concerned at an earlier date. If he has not so performed that work at an earlier date, he may show his ability to do it by performing it to the satisfaction of the Administrator or under the direct supervision of a certificated and appropriately rated mechanic, or a certificated repairman, who has had previous experience in the specific operation concerned.

(b) A certificated mechanic may not exercise the privileges of his certificate and rating unless he understands the current instructions of the manufacturer, and the maintenance manuals, for the specific operation concerned.

FACT BANK:

Repairs and modifications to aircraft instruments

Repairs and modifications to instruments could only carried out under the control of an AMO.

FACT BANK:

FAR 65.81 - General privileges and limitations

(a) A certificated mechanic may perform or supervise the maintenance, preventive maintenance or alteration of an aircraft or appliance, or a part thereof, for which he is rated (but excluding major repairs to, and major alterations of, propellers, and any repair to, or alteration of, instruments), and may perform additional duties in accordance with 65.85, 65.87, and 65.95. However, he may not supervise the maintenance, preventive maintenance, or alteration of, or approve and return to service, any aircraft or appliance, or part thereof, for which he is rated unless he has satisfactorily performed the work concerned at an earlier date. If he has not so performed that work at an earlier date, he may show his ability to do it by performing it to the satisfaction of the Administrator or under the direct supervision of a certificated and appropriately rated mechanic, or a certificated repairman, who has had previous experience in the specific operation concerned.

(b) A certificated mechanic may not exercise the privileges of his certificate and rating unless he understands the current instructions of the manufacturer, and the maintenance manuals, for the specific operation concerned.

Please provide any comments you may have on the proposed policy.

Policy topic 5 - Inspection authorisation

Policy

An Inspection Authorisation (IA) will be based on the USA model.

An applicant for an IA would be required to:

- hold a licence that is relevant (USA requires A&P) for the purpose
- meet minimum experience requirements
- pass an examination set by CASA (based on the Federal Aviation Administration (FAA) syllabus)
- meet on-going currency requirements.

In addition to the privileges of the aircraft maintenance engineer (AME) licence, an IA holder would also be authorised to return an aircraft to service after an annual inspection, a major repair or a major modification.

FACT BANK:

FAR 65.91 - Inspection authorization

(a) An application for an inspection authorization is made on a form and in a manner prescribed by the Administrator.

(b) An applicant who meets the requirements of this section is entitled to an inspection authorization.

(c) To be eligible for an inspection authorization, an applicant must:

1. Hold a currently effective mechanic certificate with both an airframe rating and a powerplant rating, each of which is currently effective and has been in effect for a total of at least 3 years;
2. Have been actively engaged, for at least the 2-year period before the date he applies, in maintaining aircraft certificated and maintained in accordance with this chapter;
3. Have a fixed base of operations at which he may be located in person or by telephone during a normal working week but it need not be the place where he will exercise his inspection authority;
4. Have available to him the equipment, facilities, and inspection data necessary to properly inspect airframes, powerplants, propellers, or any related part or appliance; and
5. Pass a written test on his ability to inspect according to safety standards for returning aircraft to service after major repairs and major alterations and annual and progressive inspections performed under part 43 of this chapter.

An applicant who fails the test prescribed in paragraph (c)(5) of this section may not apply for retesting until at least 90 days after the date he failed the test.

Please provide any comments you may have on the proposed policy.

Policy topic 6 - Manual of standards - additional detail

Policy

A manual of standards will support the new GA maintenance regulations and contain the following technical specifications or standards:

FACT BANK:

1 - Maintenance data

A hierarchical listing of data that considers existing regulation 2A of CAR and paragraph 14 of CAO 100.5 and includes acceptable data as set out in Appendix 1 – this list would not be exclusive nor exhaustive.

FACT BANK:

2 - Measuring equipment

A list of acceptable standards against which measuring equipment may be tested to verify accuracy.

- Manufacturer’s instructions are acceptable standards.
- Other acceptable standards will be described in guidance material.
- No prescription will be made as to who may do the checking or the frequency of the checking- that will be left to the discretion of the maintainer acting within the bounds of the relevant standard.

FACT BANK:

FAR 43.13 - Performance Rules (General)

(a) Each person performing maintenance, alteration, or preventive maintenance on an aircraft, engine, propeller, or appliance shall use the methods, techniques, and practices prescribed in the current manufacturer's maintenance manual or Instructions for Continued Airworthiness prepared by its manufacturer, or other methods, techniques, and practices acceptable to the Administrator, except as noted in 43.16. He shall use the tools, equipment, and test apparatus necessary to assure completion of the work in accordance with accepted industry practices. If special equipment or test apparatus is recommended by the manufacturer involved, he must use that equipment or apparatus or its equivalent acceptable to the Administrator.

(b) Each person maintaining or altering, or performing preventive maintenance, shall do that work in such a manner and use materials of such a quality, that the condition of the aircraft, airframe, aircraft engine, propeller, or appliance worked on will be at least equal to its original or properly altered condition (with regard to aerodynamic function, structural strength, resistance to vibration and deterioration, and other qualities affecting airworthiness).

(c) Special provisions for holders of air carrier operating certificates and operating certificates issued under the provisions of Part 121 or 135 and Part 129 operators holding operations specifications. Unless otherwise notified by the administrator, the methods, techniques, and practices contained in the maintenance manual or the maintenance part of the manual of the holder of an air carrier operating certificate or an operating certificate under Part 121 or 135 and Part 129 operators holding operations specifications (that is required by its operating specifications to provide a continuous airworthiness maintenance and inspection program) constitute acceptable means of compliance with this section.

FACT BANK:

3 - Experimental Aircraft

- CASA will exclude experimental aircraft from the requirements relating to compliance with certification basis.
- The type of maintenance program for an experimental aircraft will be specified in the conditions attached to the experimental certificate.
- An owner -builder who has constructed more than half of an aircraft (a qualified owner-builder) will be permitted maintain the aircraft and release it to service after repairs, modifications and annual condition inspections.
- A qualified owner-builder will be permitted to carry out maintenance for other aircraft owners provided that the aircraft is an amateur-built aircraft and is essentially similar to an aircraft that the qualified owner-builder has previously constructed.
- An owner of an amateur-built aircraft who is not a qualified owner-builder will be permitted to exercise the same privileges as a qualified owner-builder if he or she has completed a skills-based course of training acceptable to CASA that covers the maintenance to be carried out.
- Owner builders who have manufactured a propeller may maintain the propeller.
- Owner builders who have manufactured, assembled or overhauled an engine for their aircraft may maintain the engine. Other owner builders may maintain their engine if they have completed a course of training for the maintenance that is acceptable to CASA.
- Qualified owner builders may maintain instrument systems but may not repair instruments that are flight instruments or navigation instruments required for operations in controlled airspace or under IFR.

FACT BANK:

FAR 43.1 - Applicability

(a) Except as provided in paragraphs (b) and (d) of this section, this part prescribes rules governing the maintenance, preventive maintenance, rebuilding, and alteration of any—

(1) Aircraft having a U.S. airworthiness certificate;

(2) Foreign-registered civil aircraft used in common carriage or carriage of mail under the provisions of Part 121 or 135 of this chapter; and

(3) Airframe, aircraft engines, propellers, appliances, and component parts of such aircraft.

(b) This part does not apply to any aircraft for which the FAA has issued an experimental certificate, unless the FAA has previously issued a different kind of airworthiness certificate for that aircraft.

(c) This part applies to all life-limited parts that are removed from a type certificated product, segregated, or controlled as provided in 43.10.

(d) This part applies to any aircraft issued a special airworthiness certificate in the light-sport category except:

(1) The repair or alteration form specified in 43.5(b) and 43.9(d) is not required to be completed for products not produced under an FAA approval;

(2) Major repairs and major alterations for products not produced under an FAA approval are not required to be recorded in accordance with appendix B of this part; and

(3) The listing of major alterations and major repairs specified in paragraphs (a) and (c) of appendix A of this part is not applicable to products not produced under an FAA approval.

FACT BANK:

4 - Light Sport Aircraft

Subject to further consultation, CASA would consider extending similar privileges to owners of light sport aircraft if the owner has satisfactorily completed relevant training acceptable to CASA.

FACT BANK:

FAR 43.1 - Applicability

(a) Except as provided in paragraphs (b) and (d) of this section, this part prescribes rules governing the maintenance, preventive maintenance, rebuilding, and alteration of any—

(1) Aircraft having a U.S. airworthiness certificate;

(2) Foreign-registered civil aircraft used in common carriage or carriage of mail under the provisions of Part 121 or 135 of this chapter; and

(3) Airframe, aircraft engines, propellers, appliances, and component parts of such aircraft.

(b) This part does not apply to any aircraft for which the FAA has issued an experimental certificate, unless the FAA has previously issued a different kind of airworthiness certificate for that aircraft.

(c) This part applies to all life-limited parts that are removed from a type certificated product, segregated, or controlled as provided in 43.10.

(d) This part applies to any aircraft issued a special airworthiness certificate in the light-sport category except:

(1) The repair or alteration form specified in 43.5(b) and 43.9(d) is not required to be completed for products not produced under an FAA approval;

(2) Major repairs and major alterations for products not produced under an FAA approval are not required to be recorded in accordance with appendix B of this part; and

(3) The listing of major alterations and major repairs specified in paragraphs (a) and (d) of appendix A of this part is not applicable to products not produced under an FAA approval.

Please provide any comments you may have on the proposed policy.

General comments

Do you have any additional comments about the proposed policy?

(Please note, this should not include points you have already raised)

Comments