# Discussion paper on Part 66 aircraft type ratings - (DP 2202MS)

## Overview

We are seeking your feedback on proposed improvements to aircraft maintenance type ratings.

We propose to continue to generally harmonise with European Union Aviation Safety Agency (EASA) type rating and processes. However, future Australian type rating decisions will place the emphasis on an assessment of whether a new aircraft type introduces technologies or techniques that:

* are not covered by the licensed aircraft maintenance engineer (LAME) category training
* require new processes which will be unfamiliar to LAMEs
* are sufficiently safety critical as to require specialised maintenance training.

The proposed options are intended to:

* maintain an appropriate level of safety
* reduce administrative costs
* facilitate better efficiency for both CASA and industry
* effect better processes
* clarify requirements
* provide a more appropriate framework for the assignment of type ratings to aircraft under Part 66 of the *Civil Aviation Safety Regulations 1998* (CASR) and its associated Manual of Standards.

**Key changes**

The proposed key changes are:

* General alignment with EASA type rating decisions but with some variation for the Australian context.
* Future aircraft type ratings would only be generated if safety-critical technologies or processes required to maintain an aircraft are not covered by Part 66 of CASR licence category training.
* Existing type rated aircraft - not type rated prior to commencement of Part 66 of CASR - would be reverted to no type rating.
* Type rated aircraft with similar maintenance requirements would be grouped together under a common group rating.
* Training for type ratings would be made more accessible.

Please read the discussion paper document DP 2202MS for more information.

**Previous consultations**

To inform the development of this discussion paper, we consulted the Part 66 Technical Working Group, helicopter operators, approved maintenance organisations, maintenance training providers, the Australian Licensed Aircraft Engineers’ Association, LAMEs and CASA staff.

**Why your views matter**

Your feedback will help inform the next phase of policy development and implementation.

Please submit your comments using the survey link on this page.

If you are unable to provide feedback via the survey link, please email [regulatoryconsultation@casa.gov.au](mailto:regulatoryconsultation@casa.gov.au) for advice.

**Documents for review**

The Related section at the bottom of this page contains all the documents for this consultation. These are:

* Discussion paper on Part 66 aircraft type ratings - DP 2202MS
* MS Word copy of the online consultation - Discussion paper on Part 66 aircraft type ratings - (DP 2202MS), for ease of distribution and feedback within your organisation.

The Discussion Paper on Part 66 aircraft type ratings (DP 2022MS) document comprises 2 parts:

1. Discussion paper – DP 2202MS
2. Appendix A – Indicative tables of potential changes to type ratings (Appendix A is provided for reference purpose only).

## **What happens next**

At the end of the response period, we will:

* review all comments received
* make responses publicly available on the consultation hub (unless you request your submission remain confidential)
* publish a Summary of Consultation which summarises the feedback received and outlines any intended changes and next steps.

Feedback that improves on the options discussed will be incorporated into the policy proposed.

## **Post-implementation review**

We will monitor and review the new policies in practice on an ongoing basis.

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

Online Survey [This link is on the front page of the survey and takes you to the survey questions]

**Related**[This section is at the bottom of the front page and contains all the links to other sites and documents related to this consultation]

**Related Links**

* [Part 66 Manual of Standards (legislation.gov.au)](https://www.legislation.gov.au/Details/F2022C00010)

https://www.legislation.gov.au/Details/F2022C00010

* [Our regulatory philosophy | Civil Aviation Safety Authority (casa.gov.au)](https://www.casa.gov.au/about-us/who-we-are/our-regulatory-philosophy)

https://www.casa.gov.au/about-us/who-we-are/our-regulatory-philosophy

* Ministers statement of expectations [Statement of Expectations for the Board of the Civil Aviation Safety Authority for the period 31 January 2022 to 30 June 2023 (legislation.gov.au)](https://www.legislation.gov.au/Details/F2022L00061)

https://www.legislation.gov.au/Details/F2022L00061

**Related Documents**

* Proposed policy and processes - DP 2022MS
* MS Word copy of the online consultation - Discussion paper on Part 66 aircraft type ratings - (DP 2202MS)

# Audience & Interest groups

**Audience**

* Air operators
* Airworthiness organisations
* Engineers
* Manufacturers
* Part 147 of CASR Maintenance training organisations
* Aircraft owner/operator
* Part 145 of CASR approved maintenance organisations (AMO)
* Regulation 30 of CAR maintenance organisations (CAR 30)
* Licensed aircraft maintenance engineers (LAME)
* Aircraft maintenance engineers (AME)
* Aerial work operator
* Air transport operations – rotorcraft (Part 133)
* Aerial work operator (Part 138)
* Training organisation representative

**Interest**

* Airworthiness/maintenance
* Air travel
* Private operations
* Airworthiness/maintenance (CAR 30 and CASR Part 145 maintenance orgs)
* Safety promotion
* Aircraft engineer licensing

# Page. Consultation Content

**Proposed policy options**

We are seeking feedback on the following:

* Policy option 1 – Review type rating protocol
* Policy option 2 – Facilitate separate theory and practical training to improve accessibility of type training pathways
* Policy option 3 – Expand permitted training to helicopter types
* Policy option 4 – Recognition of certain type training to reduce industry costs and Australian approvals
* Policy option 5 – Group similar aircraft and engine types to expand licence maintenance permissions across a group
* Policy option 6 – Review of existing type ratings from former Group 19 aircraft.

Questions applicable to each option are available through the policy topic pages below. The survey has been designed to give you the opportunity to provide feedback on the survey in its entirety or only on the policy topics applicable to you.

When you have completed your feedback on the topics of interest to you, select the **‘Finish’** button at the bottom right of this page.

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| --- | --- |
| **Page** | **Content** |
| 1 | Personal information (required) |
| 2 | Consent to publish submission (required) |
| 3 | Principal changes under the proposed policies |
| 4 | Policy option1 – Review type rating protocol |
| 5 | Policy option 2 – Facilitate separate theory and practical training |
| 6 | Policy option 3 – Expand permitted training |
| 7 | Policy option 4 – Recognition of certain type training |
| 8 | Policy option 5 – Group similar aircraft and engine types |
| 9 | Policy option 6 – Review of existing type ratings |
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# Page 1. Personal information

## First name

*(Required)*

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## Last name

*(Required)*

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## Email address

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

Email

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

## *(Required)*

*Please select only one item*

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

No, these are my personal views.

If yes, please specify the name of your organisation.

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## Which of the following best describes the group you represent?

*Please select only one item*

Aircraft owner/operator

Licensed aircraft maintenance engineer

CAR 30 approval holder

Part 145 approval holder

Part 147 approval holder

Other

Please specify “Other” if selected.

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# Page 2. Consent to publish submission

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

Where you consent to publication, we will include:

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

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

Do you give permission for your response to be published?

*(Required)*

*Please select only one item*

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

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

I am a CASA officer.

Our [website](https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public)contains more information on making a submission and what we do with your feedback.

# Page 3. Key changes under the proposed options

The key changes are:

* We would generally align with European Union Aviation Safety Agency type rating decisions but introduce processes to vary from those decisions, if appropriate in the Australian context.
* Future aircraft type ratings would only be generated if safety-critical technologies or processes required to maintain an aircraft are not covered by Part 66 of the *Civil Aviation Safety Regulations 1998 (CASR)* licence category training.
* Existing type rated aircraft - not type rated prior to commencement of Part 66 of CASR - would be reverted to no type rating.
* Type rated aircraft which are essentially similar in maintenance requirements would be grouped together under a common rating.
* Training for type ratings would be made more accessible.

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

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# Page 4. Policy option1 – Review type rating protocol

**A review of CASAs type rating protocol**

We propose to change the way aircraft type ratings are currently assessed. See fact bank below for further information.

**Aim**

To ensure that type ratings are based on safety assessments.

**Question 1:** Do you agree with the establishment of a safety-based type rating protocol.

**Fact bank - Review of type rating protocol**

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| Fact bank content  We propose to develop a formal, technical review protocol that would be applied in cases where it may be necessary and appropriate to vary from a European Union Aviation Safety Agency decision. This review could be initiated by CASA through certification and type rating processes, or by industry through the type rating consultation processes.  We propose to generate future aircraft type ratings based on assessment of whether safety-critical technology or systems are incorporated in the aircraft which are not covered by Part 66 of the *Civil Aviation Safety Regulations 1998* licence category training. |

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide alternative suggestions below)

Undecided/Not my area of expertise

Comments

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# Page 5. Policy option 2 – Facilitate separate theory and practical training

**Facilitation of separate theory and practical training**

We are proposing that theory training be delivered separately from practical training. See fact bank below for further information.

**Aim**

To simplify access to type training.

**Question 2:** Do you agree with the proposal to provide for separate training pathways?

**Fact bank - Facilitate separate theory and practical training**

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| Fact bank content  We would expand remote learning provisions, to enable Maintenance Training Organisations to deliver remote theory training, and Approved Maintenance Organisations to deliver local practical training. We understand this option is already available, but potentially underutilised. We are seeking your feedback on how to improve this pathway and inform industry of its availability. |

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide alternative suggestions below)

Undecided/Not my area of expertise

Comments

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# Page 6. Policy option 3 – Expand permitted training

**Expanded permitted training**

We plan to provide for wider access to type ratings via the permitted training process.

**Aim**

To include all helicopter types in the permitted training provisions.

**Question 3:** Do you agree with expansion of permitted training access?

**Fact bank - Expanded permitted training**

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| Fact bank content  Currently Part 145 of the *Civil Aviation Safety Regulations 1998* and Regulation 30 of the *Civil Aviation Regulations 1988* approved maintenance organisation (AMO) may train, or organise training for, their own personnel to gain type ratings by approved permitted training programs - only available for some types of helicopters (see Part 2 of Table 2 of the Part 66 Manual of Standards (MOS)). We propose to amend Part 2 of Table 2 of the Part 66 MOS to include all helicopter types.  An AMO would still need to apply to CASA for approval to use permitted training and provide a course plan. |

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide alternative suggestions below)

Undecided/Not my area of expertise

Comments

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# Page 7. Policy option 4 – Recognition of certain type training

**Automatic acceptance of certain type rating courses**

We propose to automatically accept certain type rating courses.

**Aim**

To reduce administrative costs of obtaining course approvals and provide for access to more course providers.

**Question 4:** Do you agree with the proposal to automatically accept certain type training courses?

**Fact bank - Recognition of certain type training**

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| Fact bank content  Under this option, certain type training courses could be automatically accepted by CASA for the grant of a type rating, for example, CASA would not need to issue Australian approvals for certain training courses that meet appropriate standards, and consequently, there would be no fee payable for CASA to approve those training courses.    Given that Part 66 of the *Civil Aviation safety Regulations 1998* (CASR) is based on European Union Aviation Safety Agency (EASA), Part 66 of CASR aircraft or engine type training courses approved by EASA or an EASA Member State, would potentially be suitable for recognition. Similarly, other like-minded countries with an EASA based maintenance licensing system would be considered - for example Singapore. Countries with non-EASA based licensing systems but similar safety assurance philosophies to Australia - for example New Zealand or the USA - could be included subject to the courses being shown to cover the safety-critical matters which set an aircraft or engine apart from a non-type rated aircraft. |

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide alternative suggestions below)

Undecided/Not my area of expertise

Comments

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# Page 8. Policy option 5 – Group similar aircraft and engine types

**Group similar aircraft and engine type**

We propose to combine technically similar aircraft under a common type rating.

**Aim**

To simplify type ratings and reduce administrative burden on industry.

**Question 5:** Do you agree with the proposed grouping of similar types?

**Fact bank - Group similar aircraft and engine types**

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| Fact bank content  This option would expand the existing concept of grouping aircraft of similar types and technologies such that, a licence holder’s competency on one aircraft type or avionics system, would provide an acceptable degree of safety assurance that the licence holder could carry out maintenance of all aircraft types or avionics systems in the group, to the required standard, using the applicable instructions for continuing airworthiness.  Under this option the following would apply:   * Type training (theory and practical) for one aircraft type in a group would be used to grant type ratings and/or type rating privileges for the whole group of aircraft. * Licence holders that hold a type rating for any aircraft in a given group would automatically be granted type ratings and/or type rating privileges for the other aircraft in the relevant group. * Type training courses may be developed that cover a group of aircraft (more easily and broadly than under the current arrangements). * Similar engine groupings would be considered. * Grouping of avionics systems would also be considered. |

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide alternative suggestions below)

Undecided/Not my area of expertise

Comments

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# Page 9. Policy Option 6 – Review of existing type ratings

**Review of existing type ratings**

Aircraft that were not type rated under the former Civil Aviation Regulations (CAR) would be reverted to non-type rated.

**Aim**

To eliminate type ratings and associated costs to industry of formerly non-type rated aircraft.

**Question 6:** Do you agree with the proposed removal of certain type ratings

**Fact bank - Review of existing type ratings**

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| Fact bank content  Prior to the introduction of Part 66 of the *Civil Aviation Safety Regulations 1998*, a licensed aircraft maintenance engineer with a Regulation 31 of the *Civil Aviation Regulations 1988* Airframes Group 19 licence, could maintain and certify for maintenance of aircraft that were not classified in Group 20. When Part 66 was made, Group 19 aircraft were assigned a type rating based on the European Union Aviation Safety Agency Part 66 ratings.  We have reviewed this from a technical and general safety perspective, and while the safety assurance benefits of type ratings are acknowledged, we have found there is no tangible safety basis to require type ratings for former Group 19 helicopters and possibly some lower group aeroplanes. We therefore propose to revert former Group 19 helicopters and some former lower group aeroplanes to non-type rated aircraft covered by the privileges of a B1 licence. Appendix A provides an indicative example of possible changes. |

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide alternative suggestions below)

Undecided/Not my area of expertise

Comments

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# Page 10. Specific aircraft, engines, and type ratings

**Question 7:** Do you think that an aircraft not mentioned in this discussion paper should be considered for:

* grouping with other aircraft types under a common rating

or

* removal of the type rating?

*Radio buttons*

No

Yes (please specify suggested changes below and outline the technical or safety reasons for your suggestion)

Undecided/Not my area of expertise

Comments

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**Question 8:** Do you think that a turbine engine not mentioned in this discussion paper should be considered for:

* grouping with other engine types under a common rating

or

* removal of the type rating?

*Radio buttons*

No

Yes (please specify suggested changes below and outline the technical or safety reasons for your suggestion)

Undecided/Not my area of expertise

Comments

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**Question 9:** Do you have any suggestions for either grouping or removal of some type B2 ratings?

*Radio buttons*

No

Yes (please provide details of aircraft type and why the aircraft electrical/avionics systems are either not safety critical or are within the scope of B2 category training)

Undecided/Not my area of expertise

Comments

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# Page 10. General comments

Do you have any additional comments about the proposed policy options?

Please include any **impact** this proposed change may have on you or your operation.

Comments

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# Page 11. Your priorities

When you reflect on the feedback you have already provided, what are the 3 issues you consider most important?

Priority 1

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Priority 2

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Priority 3

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