# Proposed Part 101 MOS – Chief RePL Instructor assessment fee – (SPC 2319US)

# Overview

We're seeking your views on a proposed regulatory services fee for the assessment of an application for a new Chief Remote Pilot Licence Instructor (CRI).

After considering industry feedback, we have found the qualification requirements for Remote Pilot Licence (RePL) instructors outlined in [Part 101 (Unmanned Aircraft and Rockets) Manual of Standards (MOS) 2019](https://www.legislation.gov.au/Details/F2023C00616), are more detailed than necessary for the intended purpose. These requirements are set to take effect on 10 April 2024.

Before 10 April 2024, we are proposing the following changes to the Part 101 MOS:

1. create a new CRI position, who must hold the prescribed requirements, and will be responsible for ensuring RePL instructors meet an appropriate standard
2. replacing qualification requirements for RePL instructors with a condition that suitable internal training and checking is undertaken.

These changes aim to reduce the financial and administrative burden of all RePL instructors obtaining the required qualifications.

In line with the Australian Government [Cost Recovery Policy](https://www.finance.gov.au/government/managing-commonwealth-resources/implementing-charging-framework-rmg-302/australian-government-cost-recovery-policy), we are required to set fees for regulatory services. This consultation sets out the proposed assessment fee for the new CRI position.

**The proposed new rule set/standards**

The proposed amendment will require CASA to charge a regulatory services fee for the assessment of a new CRI application.

Regulatory service fees are either a fixed amount or a set hourly rate, that reflects the cost of CASA personnel or systems to deliver these services or activities.

The proposed fixed fee will cover the assessment of an individual’s application for the appointment to the CRI position of an approved RePL training organisation.

The proposed fee is $623.00 (no GST). This fee will be charged under the [Civil Aviation (Fees) Regulations 1995](https://www.legislation.gov.au/Details/F2021C01184).

The proposed fee was developed in accordance with the Government Cost Recovery Policy and guidelines. The estimated costs for a proficient officer to undertake the activity, were mapped with a subject matter expert and treated as a direct cost for the service. It was deemed appropriate to charge a fixed fee to give industry certainty of CASA fees.

It is proposed, CASA will waive fees for existing Remotely Operator’s Certificate (ReOC) holders applying for the assessment of a CRI application before 10 July 2024.

**Previous consultations**

In July 2021, the Part 101 Post Implementation Review (PIR) Technical Working Group supported the proposed:

* introduction of a new CRI position
* eased requirements for RePL instructors.

In late 2021, 93% of respondents also agreed with the introduction of a new CRI position following public consultation on the [Proposed Amendments to Part 101 CASR and MOS - Unmanned aircraft and rockets - (PP 2107US)](https://consultation.casa.gov.au/regulatory-program/pp-2107us/).

# Why your views matter

Your feedback will help us understand the impact the proposed fee.

This consultation is seeking your opinion on:

* the proposed charge for the assessment of an individual’s application for a newly created CRI position of an approved RePL training organisation.

This consultation is not seeking your views on the proposed:

* introduction of a new CRI position
* eased requirements for RePL instructors.

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

If you are unable to provide feedback via the survey link, please email regulatoryconsultation@casa.gov.au

## **Documents for review**

All documents related to this consultation are attached in the ‘Related’ section at the bottom of the overview page. They are:

* Summary of proposed change – 2319US, which provides background on the proposed fee
* MS Word copy of online consultation for ease of distribution and feedback within your organisation.

## **What happens next**

At the end of the response period, we will:

* review all feedback 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.

# 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 Documents**

List of documents attached to this consultation

* Summary of proposed change 2319US
* MS Word copy of online consultation on Proposed Part 101 MOS - Chief RePL Instructor assessment fee (SPC 2319US).

# Audience & Interest groups

**Audience**

|  |
| --- |
| * Drone operators
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| * Drone training organisation
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| * Holder of RPAS remotely piloted aircraft operator’s certificate (ReOC)
 |
| * Holder of RPAS and remote pilot licence (RePL)
 |
| * Commercial drone operator
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**Interest**

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| --- |
| * Drones/uncrewed aircraft systems
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| * Licensing
 |
| * New and emerging technology
 |
| * Owner of drones and/or model aircraft
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# Page 1. About this consultation

This consultation asks for your feedback on the proposed Chief RePL Instructor (CRI) assessment fee.

We will ask you for:

* **personal information**, such as your name, any organisation you represent, and your email address
* **your consent** to publish your submission
* **demographic information** to help us understand your interest in this consultation
* **your opinion on** the proposed fee.

Our [website](https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public)<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 2. 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*

[ ]  RePL Training Organisation

[ ]  RePL Instructor

[ ]  RePL holder (other than a RePL Instructor)

[ ]  ReOC holder (other than a RePL Training Organisation)

[ ]  Other

Please specify ‘Other’ if selected.

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# Page 3. 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.**

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.

Information about how we consult and how to make a confidential submission is available on our [website](https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public)<https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public>.

Page 4: Introduction of fee

We are proposing a new fixed regulatory services fee (*Civil Aviation (Fees) Regulations 1995),* for the assessment of an individual’s application for the appointment to the Chief RePL Instructor (CRI) position of an approved RePL training organisation.

It is also proposed, that for existing ReOC holders, a fee waiver will apply for the assessment of a new CRI application received before 10 July 2024.

**We are seeking your opinion on the proposed fee of $623 (no GST).**

Please provide your response by selecting one of the options below.

Radio buttons

*Required*

[ ]  Strongly Agree

[ ]  Agree

[ ]  Neutral

[ ]  Disagree

[ ]  Strongly Disagree

Impact comments

Will this change have any **impact** on you or your operation?

[ ]  No

[ ]  Yes (please specify below)

Comments

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*(250 character limit)*