



SUMMARY OF PROPOSED CHANGE



Proposed Part 101 MOS - Chief RePL Instructor assessment fee

Part 101 Manual of Standards (Chief Remote Pilot Licence Instructor)
Amendment Instrument 2023

Date	December 2023
Project number	US 21/02
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Introduction

New qualification requirements for Remote Pilot Licence (RePL) instructors prescribed in the Part 101 (Unmanned Aircraft and Rockets) Manual of Standards (MOS) 2019 are due to commence on 10 April 2024. After consideration of industry feedback, these requirements have been determined to be more prescriptive than necessary to achieve the policy intent.

As such, the following changes are proposed to the Part 101 MOS prior to 10 April 2024:

1. Create a new position in the Part 101 MOS of Chief RePL Instructor (CRI), who will be responsible for ensuring instructors meet an appropriate standard and who will need to hold the prescribed requirements.
2. Replace the prescribed qualification requirements on RePL instructors with a requirement that the instructor undertakes suitable internal training and checking.

Consistent with the Australian Government Cost Recovery Policy, CASA is required to set fees for some matters. This summary of proposed change (SPC) sets out the fee that is proposed for the new CRI position application and approval process.

Contents

Introduction	2
Reference material	4
Acronyms	4
References	4
Purpose and scope of the proposed amendments	5
The proposed fixed fee	5
Previous consultations	5
Impact on industry	6
Safety risk analysis	6
Impact analysis	6
Closing date for comment	7

Reference material

Acronyms

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

Acronym	Description
CAR	<i>Civil Aviation Regulations 1988</i>
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
CRI	Chief RePL instructor
RePL	Remote Pilot Licence
SPC	Summary of Proposed Change

References

Legislation

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

Document	Title
Fees regulations	<i>Civil Aviation (Fees) Regulations 1995</i>
CASR	<i>Civil Aviation Safety Regulations 1998</i>
MOS	<i>Part 101 (Unmanned Aircraft and Rockets) Manual of Standards</i>

Purpose and scope of the proposed amendments

The proposed amendment will require CASA to charge a fee for the new CRI position application and approval process. This fee will be charged under the *Civil Aviation (Fees) Regulations 1995*, as per the Australian Government Cost Recovery Policy.

The proposed fee will cover consideration of an application for the appointment of a person to the CRI position of an approved RePL training organisation.

The proposed fixed fee

The proposed fixed fee is \$623 per application. This calculation has an attribution of staff effort and requires a system transactional cost for the process of capturing and appointing a CRI.

Previous consultations

In July 2021, CASA consulted the amendment to introduce a CRI position and amend instructor requirements with the Part 101 PIR Technical Working Group, which were supported.

In late 2021, CASA consulted more broadly in the consultation Proposed Amendments to Part 101 CASR and MOS - Unmanned aircraft and rockets - (PP 2107US). Ninety-three percent of respondents agreed with the introduction of a CRI position.

This will be the first time CASA is consulting on the proposed fee with external stakeholders.

Impact on industry

When the initial CRI position is filled, transitional and fee waiver arrangements will be implemented by CASA. This will ensure the financial and administrative burden of the change on existing approved RePL training organisation is minimised.

The fee will be payable upon the introduction of the new CRI, at which time the nominee will undergo assessment to determine their suitability to hold the CRI position for the RePL training organisation. The proposed fees were developed in accordance with the Government Cost Recovery Policy and guidelines.

The financial burden of the new fee on approved RePL training organisations is offset by the removal of prescribed qualification requirements of RePL instructors, the most common being the Certificate IV in Training and Assessment which generally costs over \$1000 per instructor.

Safety risk analysis

There are no safety considerations as this consultation is only about the proposed fee.

Impact analysis

CASA has developed a Cost and Economic Assessment and has deemed that no further analysis is required.

Closing date for comment

CASA will consider all comments received as part of this consultation process and incorporate changes as appropriate. Comments on the Proposed Chief RePL Instructor assessment fee should be submitted through the online response form by close of business 18 January 2024.