

**From:** ken@amroba.org.au  
**To:** [RRAT Committee \(SEN\)](#)  
**Subject:** AMROBA Submission  
**Date:** Monday, 27 August 2018 8:27:43 PM  
**Attachments:** [98\\_Regulations etc.pdf](#)  
[Relevant USA Aviation Act requirements.pdf](#)

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# AMROBA

I attended the committee's meeting with Aircraft Pilots & Owners Association (AOPA) on the 27<sup>th</sup> August 2018 in Sydney.

AMROBA fully supports the AGAA recommendations and the unanimous support for the USA Federal Aviation Regulatory system for General Aviation.

Adoption of the FAA system would result in a safer system with lower costs.

Attached is a comparison with Section 98 of our Act and relevant Section of the USA aviation Act.

CASA has stated they are:

1. Aligning CASR Part 21 with FAR Part 21 post a Bilateral Aviation Safety Meeting with the FAA earlier this year.
  - a. The current BASA with the USA is crucial to our design/manufacturing industries.
2. They have stated they are moving to adopt the FAR system for maintenance of GA aircraft
  - a. AMROBA is supportive of adopting a regulatory system with higher standards but lower costs.
3. Eleven years after partially adopting the EASA licencing requirements for maintenance personnel CASA has, this year, indicated they will now fully adopt the EASA requirements.
  - a. This will align Australia with the same licencing standards adopted throughout S/E Asia and many other countries.
  - b. Education training standards still have not developed to support the CASR Part 66 standards adopted 11 years ago.

Why is the engineering disciplines (design, manufacturing, maintenance and maintenance personnel) now be focused on the aligning with the USA system whilst the flight operations discipline within CASA refusing to harmonise the regulatory structure and language with the FAR system that CASA told the industry they would do in the late 1990s.

AMROBA has been very vocal for a decade asking for adoption of the FAR operational regulations, with minimum changes, so the decline in GA can be checked.

With the design, general aviation maintenance and aircraft/parts manufacturing disciplines aligning with the FARs, the WAGGA summit made it quite clear that the operation associations all supported adoption of the FARs.

The USA aviation safety standards are second to none. They have a safety record we should aim to achieve.

CASA reputation is crucial to engineering. We need an industry and internationally respected CASA to open up global aviation markets for our manufactured products, other maintenance

services including engineering and flight operations training.

We also need the Office of Parliamentary Council (OPC) to be directed to “adopt” FAA, EASA or any other aviation regulatory system with minimum change so the intent is adopted. This happened in 1998 when political direction was required to make CASR Part 21 based on FAR Part 21.

OPC informed a combine CASA/Industry engineering meeting that they can do so IF directed by the portfolio department or agency.

Industry wants adoption – why can it not be policy or direction?

Thank you for the chance to input.

Regards

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