

19 May 2009



25 Stoney Creek Rd Bexley 2207 NSW
Ph: (02) 9554 9399 Fax: (02) 9554 9644
Email: alaea@alaea.asn.au
Web: www.alaea.asn.au
ABN: 84 234 747 620

❖ NOTICE ❖

TO: All Members

RE: Proposed changes to AME Licencing

On the 8th May CASA released a notice of proposed rule making (NPRM 0804MS) for the creation of a new structure for AME Licencing for what is currently known as the lower groups.

The ALAEA **rejects** the proposals put by CASA to introduce this licencing system in Australia.

An NPRM is the first stage in public consultation prior to new rules becoming official regulations. Submissions and comments received at this stage are considered before a notice of final rule making (NFRM) is released with a final draft of the proposed rules. After submissions have been received on an NFRM and regulatory impact statements have been prepared the new rules go before parliament then become regulations.

The ALAEA strongly recommends that all LAMEs take time to read, consider and respond to the NPRM.

The ALAEA is of the view that the NPRM as it stands is totally unacceptable on a number of grounds and these include:

- The reduction of the age to hold an AME licence to 18 years.
- The reduction of experience required to hold an AME licence down to 3 years inclusive of training.
- The introduction of a Schedule 8 maintenance licence with the intention of allowing a pre-trade qualified apprentice to certify for aircraft maintenance.
- The introduction of basic licence groupings that do not have sufficient scope to address the needs of Australian general aviation.
- Increases complexity of administration and compliance
- The current system is simpler, **safer** and has been honed over many years for the current and better outcome
- The NPRM has the potential to deskill the industry in order to reduce costs for select aviation groups and business's without regard for safety or other effects on the wider aviation industry

The ALAEA also considers the NPRM, as a document for one of the most important changes to AME licencing in Australia to be severely lacking in detail of the proposed rules. Round table debate held with the ALAEA Technical committee and invited guests with vast experience within aviation training institutions could not determine what actual licence privileges would be available from the options presented. Simple determinations of

"To undertake supervise and certify for the safety of all who fly."

how the proposed licences would compare with existing licences could not be made with the information presented. As a result it was impossible to determine what costs would be passed on to current and future LAMEs as they transitioned and attempted to progress through the proposed system.

The ALAEA has had involvement in the evolution of this NPRM from early 2007. At the start we had a positive attitude towards the consultation process and we were of the view that changes could be made to the licencing system that would be beneficial to Australian aviation. That outlook changed early on when we realised that the changes in the licencing system also included attempts to introduce certifying apprentices into the system to benefit business owners. No safety case has ever been made to justify these suggestions and despite many reservations from others involved in the consultation process CASA has pushed on regardless and included this option in the NPRM. When the suggestion of certifying apprentices was also coupled with attempts to expand 12 monthly inspections on aircraft to tri annual the ALAEA strongly voiced our concerns and was subsequently shut out of the consultation process and a draft NPRM was released

Despite the obstacles presented the ALAEA persisted in fighting to preserve the licence integrity and with the support of other aviation associations managed to have the first NPRM withdrawn prior to public release.

We held talks with CASA and a new round of consultation commenced. One meeting was held and from that the present NPRM was produced. We are disappointed that the present NPRM still contains many of the items from the original that made it unacceptable. CASA has been reluctant or unable to provide us with the basic figures of required training hours for each licence or indeed what each licence can certify for. Without these figures comparisons cannot be made to the training requirements of the current system and the proposed system and any potential cost increases to LAMEs or businesses.

The ALAEA is preparing a submission to CASA for this NPRM and we encourage all of our members to do likewise. We will provide our members with a copy of our submission outlining our opposition to many of the facets within it. Members should make their own determinations on the merits of the NPRM but we advise that our submission is made on the advice of experienced aviation trainers and our LAME's who work with these aircraft and as such is a good guide to sentiment around the country.

The closing date for submissions is the 5th of June 2009. CASA advise us that their online response facility is currently unavailable and therefore submissions will have to be returned by mail, email or fax as advised in the NPRM document.

Attached is a copy of the NPRM 0804MS. It can also be downloaded from http://www.casa.gov.au/scripts/nc.dll?WCMS:PWA::pc=PC_93295

Yours Sincerely



PAUL COUSINS
Federal President