

**ICAO Universal Safety Oversight Audit Programme**

**ICAO SUMMARY REPORT**

**AUDIT OF THE  
CIVIL AVIATION SAFETY AUTHORITY  
OF  
AUSTRALIA**

---

**(Canberra, Bankstown, Sydney, Melbourne and Morwell)  
9 to 20 August 1999**



**INTERNATIONAL CIVIL AVIATION ORGANIZATION**



# ICAO UNIVERSAL SAFETY OVERSIGHT AUDIT PROGRAMME

## Summary Report of the Safety Oversight Audit Mission to Australia

(Canberra, Bankstown, Sydney, Melbourne and Morwell, 9 to 20 August 1999)

### 1. BACKGROUND

1.1 The Civil Aviation Safety Authority (CASA) of Australia was audited from 9 to 20 August 1999 by an ICAO safety oversight audit team in accordance with the Memorandum of Understanding (MOU) agreed on 28 July 1999 between Australia and ICAO and included in Attachment A to this report. The audit was carried out pursuant to Assembly Resolution A32-11, with the objective of ascertaining the safety oversight capability of Australia and to ensure that it is in conformity with ICAO Standards and Recommended Practices (SARPs) as contained in Annexes 1, 6 and 8 to the Chicago Convention and related provisions in other Annexes, guidance material and relevant safety-related practices in general use in the aviation industry as referred to in such material.

1.2 On 13 October 1999, Australia submitted an action plan addressing all the findings and recommendations contained in the audit interim report. The action plan submitted and comments provided were reviewed by the Safety Oversight Audit Unit (SOAU) and found to be satisfactory.

### 2. AVIATION ACTIVITIES IN AUSTRALIA

The following information related to aviation activities in Australia was derived from the summary section of the pre-audit questionnaire and was confirmed by the safety oversight audit team during the audit:

a) Number of technical staff employed by the organization at Headquarters	89
b) Number of Regional Offices:	
• Airline offices	3
• Area offices	7
• Autonomous district offices	5
• Satellite district offices	4
c) Number of technical staff employed at Regional Offices	186
d) Number of active pilot licences	35 600
e) Number of active flight crew licences other than pilot licences	525
f) Number of active licences other than flight crew licences	7 050

g)	Number of commercial air transport operators	725
h)	Number of air operator certificates (AOCs) issued:	1 033
	• High capacity regular public transport (>36 pax)	15
	• High capacity cargo	10
	• Low capacity regular public transport (<36 pax)	48
	• Low capacity cargo	57
	• Low capacity charter	738
	• Flying schools	269
	• Aerial work	815
i)	Number of aircraft operations inspectors	95
j)	Number of aircraft registered in Australia	11 255
k)	Number of approved maintenance organizations (AMOs)	1 115
l)	Number of aircraft maintenance workshops	575
m)	Number of repair stations	540
n)	Number of aircraft manufacturer organizations	
	• Light aeroplanes	9
	• Engines	1
o)	Number of aircraft parts or equipment manufacturer organizations	261
p)	Number of certificates of airworthiness	9 134
q)	Number of aircraft airworthiness inspectors	116

### 3. SUMMARY OF FINDINGS

#### 3.1 General

3.1.1 Australia has established a comprehensive regulatory system for its safety oversight system which allows for the establishment of a civil aviation authority — the Civil Aviation Safety Authority (CASA) — and requires the adoption of civil aviation regulations and supporting guidance material. In reviewing the civil aviation regulations, it was noted that a large number of differences existed between the Australian regulations and relevant ICAO Annex provisions. However, it should be noted that all the differences identified were not necessarily lower than the minimum requirements of the Annex provisions.

3.1.2 The operational responsibility of supervising aviation activities rests with CASA which has a sufficient number of experts for the level of work. As government policy developed, civil aviation functions in Australia had progressively moved from a single structure, based on a government department, to a variety

of focussed organizations with specific responsibilities for policy, regulation and service provisions resulting in changes in structure, management and oversight philosophy over the last twelve years. CASA is facing an important challenge due to the simultaneous internal reorganization, change in the oversight policy from product inspections to system audits and complete restructuring of the regulations.

3.1.3 A comprehensive system for personnel licensing offers the required level of consistency and integrity. CASA issues all ICAO licences except for the glider pilot, flight navigator, flight dispatcher and aeronautical station operator licences. Some of the differences identified between the Australian personnel licensing regulations and ICAO Annex 1 have an impact on the automatic international recognition of licences issued by Australia.

3.1.4 A system for the certification and surveillance of international commercial air transport operators in conformity with the requirements contained in Annex 6, Parts I and III, has been established. A similar system has also been put in place for international general aviation activities to comply with the requirements of Annex 6, Part II.

3.1.5 The areas of aircraft certification, manufacturing and continuing airworthiness are satisfactory. All airworthiness inspectors are adequately trained, experienced and highly motivated. However, there is a need for recurrent training of airworthiness inspectors as technical recurrent training is not implemented due to organizational changes. Revision of the airworthiness regulations, the need for aircraft maintenance reliability information to be maintained and sent to CASA as part of CASA's risk management system and the need for more comprehensive ETOPS manuals from the air operators are areas which require some improvement.

3.1.6 CASA has established a system for approval of design organizations, type certification of aircraft and approval of modifications and repairs. Codes of airworthiness have been adopted for different categories of aircraft. The technical staff is appropriately qualified and trained. Procedures were established to assist airworthiness inspectors and engineers in fulfilling their duties and responsibilities. Some responsibilities are delegated to airworthiness engineers in the industry. Although no formal procedure is in place, the oversight of authorized engineers is adequate.

## 3.2 **Primary aviation legislation and civil aviation regulations in Australia**

### 3.2.1 **Abstract of findings**

3.2.1.1 The primary aviation legislation in Australia is the Civil Aviation Act (hereunder referred as the "Act") which has been enacted on 15 June 1988 and amended regularly since then. The main objective of the Act, as described in its Article 3, is "*to establish a regulatory framework for maintaining, enhancing and promoting the safety of civil aviation, with particular emphasis on preventing aviation accidents and incidents*". The Act initially established a Civil Aviation Authority (CAA) which is the regulatory agency for aviation safety and the provider of air traffic services in Australia. The Act was substantially amended in 1995 to allow for the transformation of the CAA to CASA with no operational role in the provision of air

traffic services. A second Act — the Air Services Act (1995) — was enacted at the same time to provide for the establishment of *Airservices Australia*, a Government Business Enterprise providing air traffic and fire rescue services in Australia.

3.2.1.2 The Act empowers CASA to effectively discharge its duties and responsibilities. It also provides CASA with an investigative power and the authority to develop aviation safety standards and to issue permissions and air operator certificates (AOCs). However, CASA does not have direct regulatory powers. The power for making regulations is held by the Governor General (essentially the Executive Government) in accordance with Article 98 of the Act which also requires that regulations be made for “*the purpose of carrying out and giving effect to the provisions of the Chicago Convention relating to safety*”. The rationale for giving the regulatory power to the Governor General is that regulations are delegated legislation in respect of which there must be ministerial responsibility and parliamentary oversight. CASA is a regulator, not a law-maker, and this is an important distinction in the Australian system of government. The Act (Article 11) also requires that CASA “*...performs its functions in a manner consistent with the obligations of Australia under the Chicago Convention*”.

3.2.1.3 The civil aviation regulations of Australia are in the process of a major review and are grouped in two different sets. The first set — Civil Aviation Regulations 1998 (CARs 1998) — were adopted in 1998 as the first instalment of a major revision of the Australian regulations system which will be organized along the lines of the United States’ Federal Aviation Regulation (FAR) system. It includes Parts 21 to 35 (Airworthiness). The other regulations are contained in the Civil Aviation Regulations 1988 (CARs 1988). A timetable indicates that the progressive transfer to the new system will be completed by 2003.

3.2.1.4 CASA has the authority to issue Civil Aviation Orders (CAOs) to complement the regulations. The Orders also have to be gazetted and tabled in the two Houses of Parliament. These Orders are fully enforceable. CASA has also the power under the CARs and CAOs to issue various types of Directives, Instructions and Exemptions which have legislative force. They deal with urgent or individual cases and are published in the Aeronautical Information Publication (AIP). Some of the instruments, such as General Exemptions, are gazetted and tabled in both Houses of Parliament.

3.2.1.5 An enforcement section responsible of undertaking all enforcement actions, following up and coordinating with legal counsels has been established within the Compliance Division of CASA. The enforcement philosophy is oriented towards achieving compliance. When there is no immediate threat to safety, offenders are invited, through a gradual multiple step approach, to comply with the requirements. Failure to comply could result in either a suspension or a court action. The punitive measures are prescribed by legislation and depend on the nature of the offence. When there is an immediate threat to safety, Section 28 of the Act allows for immediate suspension of an authorization or certificate.

3.2.1.6 In the course of the audit, two (2) findings relating to primary aviation legislation and civil aviation regulations in Australia were identified as items of concern requiring Australia to develop an action plan for their resolution. In this respect, two (2) recommendations were made.

### 3.2.2 **Corrective action plan proposed/taken by Australia**

3.2.2.1 *With respect to the recommendation on reducing the number of differences with ICAO SARPs, CASA will, as necessary, consult with the industry on whether or not a difference should be notified or rectified. It will also complete the programme of rewriting the CARs and monitor changes in ICAO SARPs to ensure future conformance. CASA already started consideration of those departures from SARPs which should be the subject of a notified difference and the target date for notification was 1 January 2000. CASA further indicates that it will develop programmes for monitoring future changes to SARPs to ensure that Australia remains compliant.*

3.2.2.2 *With respect to the recommendation relating to the development of adequate guidance material before implementing a transition plan from one system of surveillance to a new one, CASA confirmed that a sound regulatory basis exists in CAA 28(1) and CAA 28BE while acknowledging that some areas of regulatory oversight guidance and actual audit practices are not synchronized. Since the audit, CASA conducted surveillance and intends to review the project plan on the basis of the findings while continuing with the process and the project plan.*

### 3.3 **Organization of civil aviation in Australia**

#### 3.3.1 **Abstract of findings**

3.3.1.1 The main Civil Aviation Body of Australia is CASA. Its functions and authority are defined in Section 9 of the Act (1988) which specifies that CASA has *the function of conducting the safety regulation for civil air operations in Australian territory; and the operation of Australian aircraft outside Australian territory.*

3.3.1.2 CASA's authority is limited to safety-related activities and the Act explicitly mentions that CASA's authority does not include responsibility for aviation security.

3.3.1.3 CASA is governed by a Board consisting of four to seven members (six at the time of the audit) including a Chairman and a Deputy Chairman. The Chief Executive Officer (Director, Aviation Safety) of CASA is also a member, *ex officio*, of the Board. The members are appointed by the Minister. The Director of Aviation Safety is also appointed by the Minister on the Board's recommendation. Section 32B of the Civil Aviation Act (1988) states that "*the purposes of the Board [were] to decide the objectives, strategies and policies to be followed by CASA; and to ensure that CASA [performed] its functions in a proper, efficient and effective manner.*"

3.3.1.4 The organization of the safety regulatory functions in Australia has undergone several significant changes over the past decade. In 1988, the airports were separated from the Department of Aviation and a Civil Aviation Authority was given the responsibility of regulatory supervision and the provision of air traffic control. In a subsequent change which took place in 1995, the regulatory functions were given to a new Civil Aviation Safety Authority and the Air Traffic Services were placed under the responsibility of *Airservices Australia*, which was established as a government business enterprise. In 1998, both CASA and *Airservices Australia* had undergone a major reorganization exercise.

3.3.1.5 The organization of CASA has regional offices reporting to the Aviation Safety Compliance Division. There are three airline offices (Brisbane, Melbourne and Sydney) reporting to the Airline Operations Branch and seven area offices (Sydney Bassin, New South Wales, Victoria/Tasmania, Central Australia, Western Australia, North Queensland and South Queensland) reporting to the General Aviation Branch. In addition, there are five autonomous district offices and four satellite district offices. The regional offices are the implementation force of the Aviation Safety Compliance Division in their respective area of responsibilities.

3.3.1.6 The organizational structure of CASA to support its safety oversight activity is fully satisfactory. CASA has an adequate authority, personnel and financial resources and an effective and efficient working strategy to support its safety oversight obligations and responsibilities. For this reason, there were no findings and recommendations made relative to the organization of the civil aviation system in Australia.

#### 3.4 **Organization and staffing of personnel licensing and training in Australia**

##### 3.4.1 **Abstract of findings**

3.4.1.1 CASA directly issues all the licences contained in Annex 1 with the exception of the glider pilot, flight operation officer/flight dispatcher and aeronautical station operator licences. No new flight navigator licences were issued but some are still active. CASA has also the authority to issue licences on the basis of foreign licences or validate foreign licences. The Australian regulations and supporting guidance material are comprehensive and complete but differ from the ICAO SARPs on a number of points, listed in Appendices 6 and 7 of the audit interim report forwarded to Australia on 10 September 1999.

3.4.1.2 Within CASA, the Aviation Safety Standards Division is responsible for developing and maintaining personnel licensing standards. Within the division, the responsibility for Flight Crew Licensing is under the Operational and Flight Crew Licensing Standards Branch, the AME licensing under the Maintenance Standards Branch and the Air Traffic Control Licensing under the Airspace, Air Traffic and Aerodrome Standards Branch.

3.4.1.3 The Aviation Safety Compliance Division is responsible for the day-to-day administration of the licensing process. This is done essentially through the General Aviation Offices although the Headquarters Safety Standards Division is involved in some of the foreign validation process and in the physical issuance of the licences.

3.4.1.4 Examinations for medical certification are provided exclusively by the 900 Designated Aeronautical Medical Examiners (DAMEs) normally designated for a period of two years. DAMEs have no authority to directly issue the assessment although they issue a temporary certificate, valid for two months. Once the medical examination is completed, the DAME mails the result to the Office of Aviation Medicine in Canberra. A plan to move from mail to electronic transmission is under consideration.

3.4.1.5 The approval of flight training schools is granted under CAO, Part 80, and the schools are issued an AOC valid for one year. The certification process for one training school was reviewed and found to be in accordance with the established requirements. Records and files of several individual pilots were also reviewed and found to be in order.

3.4.1.6 In general, due process is given to the issuance of licences and the personnel licensing system established by CASA is mostly in compliance with international standards and offers the necessary level of integrity.

3.4.1.7 In the course of the audit, four (4) findings relating to personnel licensing and training in Australia were identified as items of concern requiring Australia to develop and implement an action plan for their resolution. In this respect, four (4) recommendations were made.

### 3.4.2 **Corrective action plan proposed/taken by Australia**

3.4.2.1 *With respect to the recommendation on endorsing flight crew licences which do not meet international requirements and on seeking the permission to enter other Contracting States, CASA, in the immediate term, indicated that it will notify all pilots via aeronautical information circulars (AIC) of differences, means of compliance and need to obtain permission of other States to operate if not compliant. In the short term, CASA will endorse all new paper licences issued from January 2000 and for those pilots seeking re-issue/renewal. In the long term, CASA intends to remove differences, except where justified, in the proposed new regulation CASR Part 61.*

3.4.2.2 *With respect to the issue of clearly affirming CASA's role in controlling the air traffic controller licence and ratings, CASA indicated that there is a binding legal instrument dated 31 May 1999 which gives it the ability, in its own right, to exercise powers of issuance, annotation, suspension and cancellation at its own determination. However, it agrees that oversight may have been insufficient. CASA will not make any immediate change to current arrangements with Airservices Australia but it will investigate changes to internal guidance for its audits of Airservices Australia. In the short and long terms, it is envisaged that, with the existence of multiple providers, a centralized system of licence issuance by CASA will be enacted.*

3.4.2.3 *With respect to the exemption granted to glider and free-balloon pilots, CASA, in the short term, indicated that it will require the delegated Federations to endorse all certificates (CASA to provide suitable wording) and confirm a long-term requirement of the respective Federations as issuing authorities to issue ICAO compliant licences under CASR Part 61.*

3.4.2.4 *With respect to CAR 5.66 (3 and 4), which authorizes student pilots to fly outside the Australian territory as pilot-in-command, CASA will in the long term replace CAR 5.66 (3 and 4) and consider the elimination of SPL in proposed CASR Part 61, while in the short term it will endorse SPLs with the wording “not for international use subject to approval by the relevant State authority”.*

### **3.5 Aircraft operations certification and supervision in Australia**

#### **3.5.1 Abstract of findings**

3.5.1.1 The oversight of aircraft operations is performed by a central administration office located in Canberra and area/district offices out of which three include airline operation sections. Under the Director, the responsibilities are shared between the Aviation Safety Standards and the Aviation Safety Compliance Divisions. Each Division operates under the leadership of an Assistant Director reporting to the Director of Aviation Safety.

3.5.1.2 The Aviation Safety Standards Division is responsible for formulating policies and standards leading to the drafting of regulations and orders and to the establishment of procedures in all areas of aviation activities including aircraft operations. The Division is located in Canberra.

3.5.1.3 The Aviation Safety Compliance Division is in charge of the programme delivery in accordance with the regulations and procedures established in the Aviation Safety Standards Division. The Aviation Safety Compliance Division performs the inspection and verification tasks associated with the certification and surveillance of the air operators. This Division is responsible for the oversight of aircraft operations as well as other sectors of aviation. The Aviation Safety Compliance Division is also responsible for any enforcement action to be undertaken.

3.5.1.4 In the emerging new structure of CASA, the responsibilities for air operator certification and surveillance are properly defined and assigned to specific managers. CASA has a sound aircraft operations structure which is adequately staffed to effectively conduct the certification and surveillance of air operators.

3.5.1.5 The Civil Aviation Act of 1988 requires that an Air Operator Certificate (AOC) be issued for an aircraft to be operated commercially in Australia. The Act also authorizes CASA to issue AOCs and to establish requirements. CASA, as authorized by regulations, established certification requirements which are published in a comprehensive Air Operator Certification Manual (AOCM). The manual, which serves as an inspector’s handbook as well as an information package for any applicant, is readily available to any current or prospective operator. The AOCM outlines all requirements concerning air operator certification.

It also describes the certification process itself. A prospective applicant is required to notify CASA in writing of the proposed operation including a general overview.

3.5.1.6 To meet the prescribed surveillance obligations, CASA developed the Aviation Safety Surveillance Programme (ASSP) on the basis of a detailed “ASSP Manual” supplemented by a comprehensive database. The ASSP Manual contains detailed instructions for the planning, conduct and follow-up actions related to surveillance activities. It also provides inspection report forms to be used in the performance of all phases of operational inspections such as ramp inspections, en-route inspections, base inspections, training programme review, training records, operation and flight records, aircraft maintenance records and flight crew proficiency checks, etc.

3.5.1.7 The overall surveillance plan contains established projected surveillance targets which, upon implementation of the plan, translate into varying results in the area of aircraft operations. High capacity RPT operations inspections are performed at a relatively high level in excess of seventy per cent of the planned targets while in other areas bearing a lower priority, like corporate operations and other areas covered by general aviation, the level of implementation of the plan is lower than thirty per cent. The audit team was unable to determine whether those variations in the implementation of the plan resulted from a lack of resources, changing priorities or unrealistically planned targets.

3.5.1.8 CASA is in the process of redefining its surveillance philosophy to move from the “end product” sampling concept to a “systems audit” concept. Once the transition is completed, each operator will be required to establish its own operations quality assurance system and to establish and support its own self-audit capability. CASA would then concentrate its efforts to audit systems rather than products in conducting audits. The system approach would also provide for some flexibility in allowing for variations in the audit cycles based on risk assessments.

3.5.1.9 While these changes are taking place, the implementation of the surveillance plan is also changing from a specialized assignment approach to a team concept approach. In the previous approach, each of the specialized areas (i.e. airworthiness, dangerous goods, aircraft operations, etc.) implemented its own part of the inspection plan in an autonomous manner which led to multiple repeated interventions with the operator. The team concept relies on a multi-disciplinary approach whereby a team, in a single intervention, reviews many facets of an operation.

3.5.1.10 The surveillance requirements and procedures outlined in the ASSP Manual are generally in accordance with ICAO requirements and guidance material. The surveillance activities are performed in accordance with the procedures established in the ASSP Manual.

3.5.1.11 In the course of the audit, four (4) findings relating to aircraft operation in Australia were identified as items of concern requiring Australia to develop and implement an action plan for their resolution. In this respect, four (4) recommendations were made.

### 3.5.2 **Corrective action plan proposed/taken by Australia**

3.5.2.1 *With respect to a recommendation relating to the revision of regulations to establish an appropriately defined structure for the development and approval of training syllabi, Australia indicated that in the short-term (by 30 November 1999), it would issue a policy requiring operators to introduce initial, recurrent and CRM training ahead of the introduction of the new regulations. In the long-term (by January 2002), new regulations will mandate initial and recurrent training including ETOPS and CRM, as applicable.*

3.5.2.2 *On the need for the establishment of an aircraft type training policy, CASA will ensure that, as of 30 June 2000, each type specialist receives eight hours of training and that the training continues to be conducted with periodic reviews. On the establishment of a training programme, CASA has employed the services of a technical expert from the industry to analyse the training needs and develop the training programmes and support the infrastructure required. This programme is expected to be introduced by 30 June 2000 and then a continuing programme will be introduced. With respect to ensuring that inspector training records reflect all technical training received, CASA indicated that a Manager Flying Operations Training will be recruited (30 November 1999) and an accessible database system would be established (by 31 December 1999) to record all flying training and other qualifications. By 30 June 2000, a centralized training records system would be established and by December 2000, the system will identify any training requirements, flying or technical, which are unfulfilled and allow corrective action to be taken.*

3.5.2.3 *With respect to a recommendation requiring CASA to establish an adequate means for the management of the implementation of the surveillance plan, CASA in the immediate produced a new plan for the current year and committed resources to achieve the plan related to airline operations, while scheduling a review of the general aviation surveillance plan in October 1999. In the long-term, CASA will establish a project plan for general aviation similar to that established for airlines, to be completed by 31 March 2000.*

## 3.6 **Airworthiness of aircraft**

### 3.6.1 **Abstract of findings**

3.6.1.1 The airworthiness engineering duties are shared by the Aircraft Certification Standards Branch and the Aviation Engineering Support Group. The Aircraft Certification Standards Branch was previously part of an Airworthiness Branch which was also responsible for maintenance standards. It has just been reorganized in three sections (Airframes, Systems and Project Support). Fifteen engineers are working within the Aviation Certification Standards Branch. The reorganization is not yet completed and staff has to be formally appointed in the new sections.

3.6.1.2 Within the Aviation Safety Compliance Division, the Aviation Engineering Support Group is responsible for approving major modifications and repairs, for surveying design organizations and for appointing persons authorized to approve modifications and repairs. It is also providing

performance-engineering support for operators certification and technical support to the Aircraft Certification Standards Branch. The Aviation Engineering Support Group is located in Bankstown (one manager and two engineers) and has an office in Melbourne (four engineers) and in Brisbane (one engineer). Some further reorganization is planned with the nomination of team leaders in Bankstown and Melbourne. The Aviation Engineering Support Group is participating in monthly management meetings of the Aviation Safety Compliance Division. Respective roles of the Certification Branch and Engineering Support Group need clarifications in certain areas. In the same manner, responsibilities for approval and surveillance of production organizations within the Compliance Division have also to be clarified.

3.6.1.3 CASA conducts its work according to the procedures set in a number of manuals which are available to guide airworthiness inspectors and engineers in carrying out their duties.

3.6.1.4 *Surveillance of type certified products:* Major defects reported to CASA are analysed by the Certification Branch. When continuing airworthiness is in question, CASA informs the manufacturer of the problem and requests an explanation. CASA has issued Airworthiness Policy Notice 001 for defining CASA's approach to compliance with CARs 1988, Regulation 37A, outlining who is accountable for the issue, revision and revocation of airworthiness directives (ADs) and ensuring that CASA meets its obligation regarding the exchange of continuing airworthiness information under Annex 8. Detailed procedures for issuance of airworthiness directives are contained in a draft procedures manual.

3.6.1.5 The Australian system in place for oversight of design activities is satisfactory; adequate regulations have been established; competent engineers are employed and procedures have been developed to help technical staff carrying out their duties.

3.6.1.6 The airworthiness duties of controlling and supervising airworthiness activities in Australia through CASA are shared by the Aviation Safety Standards Division (ASSD) and the Aviation Safety Compliance Division (ASCD) at Headquarters in Canberra and its policies and procedures are further articulated through its seven regional offices in Australia.

3.6.1.7 The Aviation Engineering Support Group (AESG) which is also part of the Aviation Safety Compliance Division has the responsibility for approving major modifications and repairs, surveying design organizations and for appointing persons authorized to approve modifications and repairs. However, this group does at times become involved in continuing airworthiness issues on a case-by-case basis.

3.6.1.8 CASA's Airworthiness Inspection Department is found to be in a state of transition and reorganization. Many of the airworthiness regulations and inspector positions are under review and a massive recruitment is underway. All CASA airworthiness inspectors are empowered by the Civil Aviation Regulations of Australia to perform their inspection and oversight duties. Each CASA airworthiness inspector has received an Instrument of Delegation and Authorization specifying the scope of inspection authority.

3.6.1.9 In the course of the audit, seven (7) findings relating to the airworthiness of aircraft in Australia were identified as items of concern requiring Australia to develop and implement an action plan for their resolution. In this respect, seven (7) recommendations were made.

### 3.6.2 **Corrective action plan proposed/taken by Australia**

3.6.2.1 *With respect to the recommendation on the need to revise the airworthiness regulations, Australia indicated that initially CASA will bring to the attention of airworthiness inspectors the recent changes to the Annex in order for them to bring the changes to the notice of all international AOC holders. Airworthiness inspectors will then ensure that these requirements are included in the operator's programme. In the short and long terms, existing advisory material will be revised and internal procedures will be developed and published by 1 June 2000 and CASA's Regulatory Framework Programme will incorporate these changes to the Annex by the third quarter of 2000.*

3.6.2.2 *On the issue of the development and submission of operator's maintenance reliability programmes, CASA will promulgate a policy to re-implement the previous method of oversight of reliability programmes and will also develop and publish additional advisory material and internal procedures by 30 March 2000. CASA's regulatory framework programme will clearly incorporate the requirement for a reliability programme by the third quarter of 2000.*

3.6.2.3 *On the issue of revising the regulations to include comprehensive ETOPS requirements, CASA will initially bring to the attention of inspectors the need for ETOPS programmes and programme control and the inspectors will then ensure that these requirements are included in the approved system of maintenance. CASA will also develop and publish additional advisory material and internal procedures by 1 January 2000. CASA's regulatory framework programme will clearly incorporate the requirement for a reliability programme by the third quarter of 2000.*

3.6.2.4 *With respect to the provision of recurrent training, CASA indicated that it will review short-term technical currency requirements to identify shortfalls by 1 January 2000, while continuing to provide the current training courses including interim avionics and ETOPS courses to its inspectors. CASA is developing a comprehensive system of competency based training (CBT) for all its airworthiness inspectors based around guidance provided in ICAO Doc 9389. This training will be ready for delivery in April 2000.*

3.6.2.5 *With respect to the recommendation on MELs, CASA, while noting that regulations do require all current commercial air transport operators with fixed schedules to have an approved MEL, indicated that a process to amend regulations requiring MELs will commence immediately. Pending long-term regulatory changes, CASA will develop and publish additional advisory material and internal procedures by 30 June 2000. CASA's regulatory framework programme will clearly incorporate the requirement for a reliability programme by the third quarter of 2000.*

3.6.2.6 *On the subject of notifying ICAO of differences existing between Annex provisions and adopted Australian regulations, Australia indicated that it will notify ICAO of all differences against FARs 23, 25, 27 and 29 and JARs 23, 25 and JAR-VLA by 30 June 2000. Differences against all other codes will be notified by 31 December 2000.*

#### 4. **COMMENTS**

As was presented in the background information of this report, Australia, on 13 October 1999, submitted a corrective action plan addressing all the findings and recommendations contained in the audit interim report which are found to be acceptable. The action plan submitted indicates that several of the actions were already taken or were under process. In most cases, a number of actions would be completed by the time this final report is prepared. It is therefore requested that Australia inform ICAO of actions completed as per the action plan and also provide ICAO with evidence of such actions being completed, as applicable.

#### 5. **ICAO SARPs NOT IMPLEMENTED**

Several differences existing between ICAO Annexes 1, 6 and 8 and the Australian regulations were identified and remained not implemented by the time this report was prepared. On the basis of Article 17 of the MOU signed between Australia and ICAO, the differences contained in the Attachment to this report will be forwarded to the appropriate Sections of the Air Navigation Bureau for inclusion in the Supplements to the respective Annexes.

#### 6. **ATTACHMENTS**

- Attachment A — Notification of differences to ICAO Standards and No Differences to be Notified, Annex 1 — *Personnel Licensing*
- Attachment B — Notification of differences to ICAO Standards and No Differences to be Notified, Annex 6 — *Operation of Aircraft, Parts I, II and III*
- Attachment C — Notification of differences to ICAO Standards and No Differences to be Notified, Annex 8 — *Aircraft Airworthiness*

-----

## ATTACHMENT A

### STATUS OF DIFFERENCES TO ICAO STANDARDS

#### (ANNEX 1 — PERSONNEL LICENSING)

*Note: This list incorporates differences previously notified by Australia.*

(\*\*) *Indicates a difference which should be endorsed on the licence in application of Article 39 of the Chicago Convention on International Civil Aviation.*

ICAO Standard Reference	CAR/CAO Reference	Differences between the national regulations and ICAO Standards
1.2.4.2 (**)	CAR 6.14	In case of a renewal of a medical certificate and when the examination is taken less than 28 days before the certificate expires, the period of currency of the new medical certificate begins on the date where the previous medical certificate expired and not on the day it is issued.
1.2.4.4.1		Exceptions are made for medical examiners in remote area.
1.2.5.1.1		Aircraft ratings are entered on the logbook and there is no requirement that the logbook be carried with the licences. As a result, it is impossible for another State to assess whether the licence is valid for a specific flight.
1.2.5.2 (**)	CAR 6.14 (4)	The interval between two medical fitness reports is 48 months for Class 2 assessment when the holder is less than 40 years old.
1.2.5.2.1 (**)	CAR 6.14 (4)	The interval between two medical fitness reports is 12 months for Class 1 assessment when the holder is between age 40 and 60.
1.2.5.2.2	CAR 6.14 (4)	<b>Recommendation:</b> Not implemented in the CARs.
1.2.6.1 and 1.2.7	CAR 6.16	This Standard applies only to licences which require medical certification and, as a consequence, does not apply to the Aircraft Maintenance Engineer.
2.1.3.3		Class and type ratings are entered on the logbook rather than on the licences.
2.1.5.2 a)	CAO part 40 Appendix III	The Australian syllabus for type rating on multi-crew aeroplane does not require procedures for crew incapacitation and crew co-ordination including allocation of pilot tasks; crew co-operation and use of checklists.
2.1.5.2 c)	CAO part 40	There is no requirement that the applicant for a type rating on multi-crew aeroplane demonstrates at the airline transport pilot licence level an extent of knowledge determined by the Licensing Authority on the basis of the ATPL knowledge requirements.

ICAO Standard Reference	CAR/CAO Reference	Differences between the national regulations and ICAO Standards
2.1.10.1 (**)	5.110, 5.126, 5.171 & 5.180	The age limit for pilot-in-command of aircraft engaged in scheduled international air services or non-scheduled international air transport operations for remuneration or hire is not implemented.
2.10.1.2	5.110, 5.126, 5.171 & 5.180	<b>Recommendation:</b> The age limit for co-pilots of aircraft engaged in scheduled international air services or non-scheduled international air transport operations for remuneration or hire is not implemented.
2.2.2	CAR 5.66	Student pilot may act as pilot-in-command (i.e carrying passengers) under the supervision of an authorized instructor.
2.3.1.3.2 (**)	CAR5.84	There is no requirement that the flight experience for the PPL-A licence be gained on an aeroplane.
2.4.1.3.1.1 (**)	CAR 5.115	The command time requirement for the CPL licence may be gained on an aircraft category other than aeroplane.
2.5.1.3.2 (**)	CAR 5.172 (4) (c)	Australia gives credit to flight time as flight engineer and flight navigator towards the ATPL-A experience requirements.
2.5.1.5.1	CAR 5.165	There is no requirement that the applicant for an ATPL A demonstrate his or her ability to perform as pilot-in-command of a multi-engined aeroplane required to be operated with a co-pilot.
2.6 (**)	CAO 40.2.1	Australia issues an instrument rating restricted to a co-pilot for which no experience other than the one of the supporting licence exists.
2.6.1.3.1	CAO 40.2.1 - 8.3	There is no requirement that at least 10 hours of the command cross country time be on an aeroplane as required by Annex 1.
2.6.1.3.2	CAO 40.2.1 - 8.3	There is no requirement that the 10 hours instrument instruction time be on an aeroplane as required by Annex 1.
2.6.1.5.1 (**)		There is no requirement that a private pilot seeking an instrument rating meet the hearing requirements of Class 1 medical assessment.
2.6.1.5.1.2		<b>Recommendation:</b> There is no requirement that a private pilot seeking an instrument rating, comply with the requirements of a Class 1 medical assessment.
2.7.1.4.1.1		<b>Recommendation:</b> Applicants for a PPL H are not required to receive dual instrument flight instruction.
2.8.1.3 (**)	CAR 5.127 (1) (c)	The minimum experience is 125 hours rather than the 150 hours required by Annex 1.

ICAO Standard Reference	CAR/CAO Reference	Differences between the national regulations and ICAO Standards
2.8.1.3.1.1 (**)	CAR 5.127 (4)	The CARs do not require 10 hours of dual instrument flight instruction.
2.8.1.4 and 2.8.1.5		The CARs do not require flight instruction and testing in flight manoeuvres and recovery from unusual attitudes by reference solely to basic flight instruments.
2.9.1.3.1.1		The CARs do not require aeronautical experience under instrument and in night flying.
2.10 (**)	CAO 40.2.1	Australia issues an instrument rating restricted to a co-pilot for which no experience other than those of the supporting licence exists.
2.10.1.3.1	CAO 40.2.1 - 8.3	There is no requirement that at least 10 hours of the command cross country time be on helicopters as required by Annex 1.
2.10.1.3.2	CAO 40.2.1 - 8.3	There is no requirement that the 10 hours instrument instruction time be on helicopters as required by Annex 1.
2.10.1.5.1 (**)		There is no requirement that a private pilot seeking an instrument rating meet the hearing requirements of Class 1 medical assessment.
2.10.1.5.1.2		<b>Recommendation:</b> There is no requirement that a private pilot seeking an instrument rating comply with the requirements of a Class 1 medical assessment.
2.11.1.2	CAO 40.3.7 Para 4.3	CAOs 40.3.7 requires the applicant for an instructor rating to hold a CPL. However, the Australian CPL-H does not contain any instrument experience requirement and does meet the Standard contained in 2.11.1.2.
2.12	CAO 95.4	No licence is required for glider pilot.
2.13	CAO 95.54	No licence is required for private pilot (free balloon). Commercial pilots are issued with a licence which meets ICAO requirements.
3.3	CAR 195A	Australia issues a restricted flight engineer licence which does not meet the knowledge and experience requirements of Annex 1.
3.3.1.2	CAO 43.1	There is no knowledge requirement on flight performance and planning, human performance and limitations and operational procedures.
3.3.1.2.1		<b>Recommendation:</b> Not implemented.
4.2.1.2		There is no knowledge requirement on human performance and limitations.

ICAO Standard Reference	CAR/CAO Reference	Differences between the national regulations and ICAO Standards
4.3.1.1	CAR 102	Minimum age is 18 years (note CAO 50.1 stipulates 21 years but has a lower legal standing than CAR 102).
4.3.1.2, 4.3.1.3, 4.4.1.2 and 4.4.1.3		There is no regulatory requirement governing the experience and the knowledge requirement but actual practice is in line with ICAO requirements.
5.1		<p>The following differences exist with the physical specifications of personnel licences:</p> <p><b>Flight Crew:</b></p> <ul style="list-style-type: none"> <li>a) item (I) refers to CASA rather than Australia;</li> <li>b) the title of the licence (II) is not in a very bold type; and</li> <li>c) the date of birth (IVa), the address (V), the nationality (VI) and the ratings (XII) are not included on the licence.</li> </ul> <p><b>Aircraft Maintenance Engineer</b></p> <ul style="list-style-type: none"> <li>a) item (I) refers to CASA rather than Australia;</li> <li>b) the title of the licence (II) is not in a very bold type;</li> <li>c) the date of birth (IVa) is not included on the licence; and</li> <li>d) the colour coding of paragraph 5.1.3 is not followed.</li> </ul>
6.2.4.2		The Designated Aviation Medical Examiner Handbook provides information on methods of testing colour vision but does not specify required illumination conditions.
6.3.2.5, 6.4.2.5 and 6.5.2.5		Cases are dealt on individual basis. A number of cardiovascular conditions, specifically including a history of myocardial infarction, are not necessarily regarded as disqualifying.
6.3.2.24 and 6.3.2.23		Not implemented.
6.3.4.1 and 6.5.4.1		An audiogramme is required every 5 years regardless of age.
6.3.2.8.1, 6.4.2.8.1 and 6.5.2.8.1		A routine chest radiography is not required for any class of medical certificate.
6.3.2.21, 6.4.2.20 and 6.5.2.19		Not implemented.

ICAO Standard Reference	CAR/CAO Reference	Differences between the national regulations and ICAO Standards
6.3.3.3.1, 6.3.3.3.2, and 6.5.3.3		Correction of more than +/- 3 dioptres is not necessarily disqualifying.
6.4.3.3.1		Correction of more than +/- 5 dioptres is not necessarily disqualifying.
6.3.2.18, 6.4.2.17 and 6.4.2.16		The medical questionnaire and examination form do not specifically address diseases of the blood or immune other than HIV.
6.3.2.27, 6.4.2.26 and 6.5.2.23		Speech defects are not necessarily disqualifying but must be reported.

-----

## ATTACHMENT B

### STATUS OF DIFFERENCES TO ICAO STANDARDS

#### (ANNEX 6 — OPERATION OF AIRCRAFT)

#### (PART I — International Commercial Air Transport - Aeroplanes)

*Note: This list incorporates differences previously notified by Australia.*

Standard Reference	Protocol Reference	Differences between the national regulations and ICAO Standards
4.2.2.2	OPS 4.406	There is no approval of the related information produced in the operations manual.
4.2.6.2	OPS 4.411	The method is mandated by the State and published in the AIP.
4.2.8	OPS 4.413	Threshold crossing heights are mandated by the State through the provision of electronic or visual vertical guidance.
4.2.10.2	OPS 4.415	Flight time, flight duty time limitations and rest periods are mandated by the State. Several exemptions and standing exemptions are issued. These limitations do not apply to cabin crew.
4.3.3.1	OPS 4.418	Applicable to international flights only.
4.3.4.1.2	OPS 4.418	No distance based on time requirement is specified in the regulations. It is linked with performance requirements.
4.3.7.2	OPS 4.423	There is no requirement to maintain two-way communications between the aircraft and the ground crew while refuelling with passengers on board.
4.4.7		Not covered by regulation.
4.4.9.1		<b>Recommendation:</b> Procedure for aerodrome is mandated by State.
4.7	OPS 4.426	ETOPS training is not mandated by regulation.
5.1.2		Regulatory requirement for IFR operations only.
5.3.1		Provision mandated only for international aerodromes. Limited data is provided for numerous Australian aerodromes in the AIP.
6.2.2		Regulations empower the Authority to direct that medical supplies be provided but no direction published (i.e. nil requirement).
6.3.1.2		Not implemented.
6.3.1.3		Metal foil FDRs are still permitted.
6.3.1.4		<b>Recommendation:</b> Not implemented.

Standard Reference	Protocol Reference	Differences between the national regulations and ICAO Standards
6.3.1.5		Not implemented.
6.3.1.6		<b>Recommendation:</b> Not implemented.
6.3.1.7		<b>Recommendation:</b> Not implemented.
6.3.3.1		Not implemented.
6.3.3.2		Not implemented.
6.3.3.3		<b>Recommendation:</b> Not implemented.
6.3.4.2		<b>Recommendation:</b> Cut-off point is established at 29 000 kg.
6.3.10.1	OPS 4.432	There is no requirement for operators to establish a procedure to that effect.
6.3.10.2		There is no requirement for operators to establish a procedure to that effect.
6.11		<b>Recommendation:</b> Requirement applies only to aircraft required to be operated by two or more flight crew members.
6.13		There is no requirement for the carriage of a noise certificate in an aeroplane.
6.15.3		The requirement applies only to aeroplanes of 15 000 kg and more.
6.15.6		<b>Recommendation:</b> Not implemented.
6.16.2		<b>Recommendation:</b> Not implemented.
6.17.3		<b>Recommendation:</b> Not implemented.
6.18.2		Not implemented.
6.18.3		<b>Recommendation:</b> Not implemented.
6.19		Applicable only within A, B and C airspace where there is radar coverage.
6.2	OPS 4.434	Requirement not based on transition altitude.
6.21.1		<b>Recommendation:</b> Not implemented.
6.21.2		<b>Recommendation:</b> Not implemented.
7.1.2		The specific requirement for 121.5 is not mandated.
7.2.3		No regulations to support RVSM requirements. However, interim RVSM approval is granted to some operators.

Standard Reference	Protocol Reference	Differences between the national regulations and ICAO Standards
7.2.4		Requirement specified for equipment using ground based facilities and only in identified airspace for self-contained equipment.
Chapter 8		Not all the requirements contained in Chapter 8 concerning the operator's maintenance responsibilities, operator's maintenance control manual, maintenance programme, maintenance records, continuing airworthiness information, modifications and repairs and approved maintenance organizations are referred in the Australian Civil Aviation Regulations.
8.7.5.4		There is no comparable requirement in Australian regulations for training in knowledge and skills related to human performance.
8.8.2		Australian regulations do not require records to be maintained after the end of the operating life of the unit.
9.3.1		Partially implemented. Training syllabus is required but details of the content at the discretion of the operator and approving office.
9.4.1	OPS 4.437	The requirement on same type is for one take-off and one landing in 35 days.
9.4.2	OPS 4.438	The requirement on same type is for one take-off and one landing in 35 days.
10.2	OPS 4.444	<b>Recommendation:</b> Initial training of flight operations officers/dispatchers is required. There is no requirement for familiarization flights.
10.4		<b>Recommendation:</b> Not implemented.
11.5.2		<b>Recommendation:</b> There is no requirement to ensure that entries in aircraft logbooks are made in ink or indelible pencil.
12.4	OPS 4.451	Combined flight attendants/flight crew training is not mandated.
12.5	OPS 4.452	Flight time, duty and rest periods for flight attendants are not governed by Civil Aviation Regulations or mandated by CASA.
13.1		There is no requirement for flight crew compartment door to be lockable.
13.5.1		<b>Recommendation:</b> There is no requirement for the provision of specialized means of blast attenuation for use at the least-risk bomb location.

**STATUS OF DIFFERENCES TO ICAO STANDARDS**  
**(ANNEX 6 — OPERATION OF AIRCRAFT)**  
**(PART II — International General Aviation - Aeroplanes)**

<b>Standard Reference</b>	<b>Protocol Reference</b>	<b>Differences between the national regulations and ICAO Standards</b>
4.18.2		<b>Recommendation:</b> There is no requirement to maintain two-way communications between the aircraft and the ground crew while refuelling with passengers on board.
6.1.3.1		The requirements for fire extinguisher and for first-aid kit are not implemented as prescribed.
6.1.4.1		Not implemented.
6.2.2		<b>Recommendation:</b> Not implemented.
6.3.1		The sound signal and anchor requirements are not implemented.
6.8		There is no requirement for the carriage of a noise certificate in an aeroplane.
6.9.2		Not implemented.
6.9.5		<b>Recommendation:</b> Not implemented.
6.10.1.2		Not implemented.
6.10.1.3		Metal foil FDRs are still permitted.
6.10.1.4		<b>Recommendation:</b> Not implemented.
6.10.1.5		Not implemented.
6.10.1.6		<b>Recommendation:</b> Not implemented.
6.10.3		Not implemented.
6.10.3.2		Cut-off point is established at 29 000 kg.
6.10.4.2		<b>Recommendation:</b> Partially implemented in that there is no requirement for non-turbine aircraft certificated before July 1965.
6.10.5.2		<b>Recommendation:</b> Not implemented.
6.10.7.2		There is no regulatory requirement established.
6.10.8		There is no regulatory requirement established.

**STATUS OF DIFFERENCES TO ICAO STANDARDS**

**(ANNEX 6 — OPERATION OF AIRCRAFT)  
(PART III — International Operations - Helicopters)**

<b>Standard Reference</b>	<b>Protocol Reference</b>	<b>Differences between the national regulations and ICAO Standards</b>
		<b>SECTION II</b>
2.2.6.2		The method is mandated by the State and published in the AIP.
2.2.6.4		<b>Recommendation:</b> Not implemented.
2.2.9.2		Flight time, flight duty time limitations and rest periods are mandated by the State. Several exemptions and standing exemptions are issued. These limitations do not apply to cabin crew.
2.2.11		<b><u>CHECK FAR 27.52 AND FAR 29.52</u></b>
2.3.3.1		Applicable only to international flights
2.3.3.2		Not implemented.
2.3.4.3		<b>Recommendation:</b> There are no specific provisions for off-shore operations. The only requirements are the general fuel requirements provisions.
2.3.6.3		The only requirements are the general fuel requirements provisions.
2.3.4.7		Not implemented.
2.4.9		<b>Recommendation:</b> Not implemented.
2.5.5		There is no requirement for a journey logbook. However, trip records are required.
3.1		Australia uses a different helicopter classification system.
3.2.7		Not implemented. Australia uses a different helicopter classification system and relies on aircraft certification requirements as a basis for performance.
3.3.1		The State does not provide the information and operators are expected to obtain the data.
3.3.2		Operators are not required by regulation.
4.2.2		The requirements for fire extinguisher and for first-aid kit are not implemented as prescribed.
4.3.1.2		Not implemented.

Standard Reference	Protocol Reference	Differences between the national regulations and ICAO Standards
4.3.1.3		Not implemented.
4.3.1.4		Not implemented.
4.3.1.5		Not implemented.
4.3.1.6		<b>Recommendation:</b> Not implemented.
4.3.3		Not implemented.
4.3.3.2		<b>Recommendation:</b> Not implemented.
4.3.4		Not implemented.
4.3.4.2		Not implemented.
4.3.5		Not implemented.
4.3.6.2		<b>Recommendation:</b> Not implemented.
4.3.8.2		Not implemented.
4.4.2		Not implemented.
4.5.1		Partially implemented only for passenger carrying helicopters.
4.5.2.6		<b>Recommendation:</b> Not implemented.
4.5.2.7		<b>Recommendation:</b> Not implemented.
4.5.2.8		<b>Recommendation:</b> Not implemented.
4.7.3		<b>Recommendation:</b> Not implemented.
4.8.4		<b>Recommendation:</b> Not implemented.
4.11.2		<b>Recommendation:</b> Not implemented.
4.12		<b>Recommendation:</b> Partially implemented. The requirement is based on the number of crew members required.
4.13		There is no requirement for a noise certificate to be carried.
4.15		Applicable only within A, B and C airspace where there is radar coverage.
4.16		Requirement not based on transition altitude.
5.1.1		121.5 is not specifically required.

Standard Reference	Protocol Reference	Differences between the national regulations and ICAO Standards
5.2.2		Requirement specified for equipment using ground based facilities and only in identified airspace for self-contained equipment.
7.4.1		The requirement on same type is for one take-off and one landing in 35 days.
8.4		<b>Recommendation:</b> Not implemented.
10.4		Flight time, duty and rest periods for flight attendants are not mandated by the authority.
		<b>SECTION III</b>
2.6.1		Not implemented.
2.7.2		Not implemented.
2.8.3.1		Prescribed fuel requirements are general and do not mandate specific times.
2.8.3.2		Prescribed fuel requirements are general and do not mandate specific times.
2.8.3.3		Prescribed fuel requirements are general and do not mandate specific times.
2.18.2		<b>Recommendation:</b> There is no requirement to maintain two-way communications between the aircraft and the ground crew while refuelling with passengers on board.
3.3		Australia uses a different helicopter classification system.
3.4		Australia uses a different helicopter classification system.
4.1.3		The requirements for fire extinguisher and for first-aid kit are not implemented as prescribed.
4.1.3.2		<b>Recommendation:</b> Not implemented.
4.1.3.3		<b>Recommendation:</b> Partially implemented for helicopters manufactured from 1992 onwards.
4.2.2		<b>Recommendation:</b> Not implemented.
4.3.2.6		<b>Recommendation:</b> Not implemented.
4.3.2.7		<b>Recommendation:</b> Not implemented.
4.3.2.8		<b>Recommendation:</b> Not implemented.
4.7.2		<b>Recommendation:</b> Not implemented.
4.9.1.2		Not implemented.

Standard Reference	Protocol Reference	Differences between the national regulations and ICAO Standards
4.9.1.3		Metal foil FDRs are still permitted.
4.9.1.4		<b>Recommendation:</b> Not implemented.
4.9.1.5		Not implemented.
4.9.1.6		<b>Recommendation:</b> Not implemented.
4.9.3.1		Not implemented.
4.9.3.2		<b>Recommendation:</b> Not implemented.
4.9.4.1		Not implemented.
4.9.4.2		<b>Recommendation:</b> Not implemented.
4.9.5.2		<b>Recommendation:</b> Not implemented.
4.9.7.2		Not implemented.
4.10.3		Not implemented.
4.11		Applicable only within A, B and C airspace where there is radar coverage.
4.12		Requirement not based on transition altitude.
5.1.5		<b>Recommendation:</b> 121.5 is not specifically required.
5.2.2		Requirement specified for equipment using ground based facilities and in identified airspace only for self-contained equipment.

-----

## ATTACHMENT C

### STATUS OF DIFFERENCES TO ICAO STANDARDS

#### (ANNEX 8 — AIRCRAFT AIRWORTHINESS)

Differences	Australian Regulation / Practice	Description
<b>PART II</b>		
6.2.2 & 6.2.3	CAR (1988) § 29	In the case of damage to an aircraft and permission given by the State or Registry for ferry flight, CAR provides that CASA will not permit flight if it considers that it would be detrimental to the safety of air navigation to do so.
<b>PART III</b>		
2.3.4	CAR (1998) Part 25 FAR 25, JAR 25	Regarding stall warning FAR 25 and JAR 25 do not explicitly refer to alarms with one power-unit inoperative.
9.3.5	CAR (1998) Part 25	No requirement for a least risk bomb location.
9.6.2	CAR (1998) Part 25 FAR/JAR 25.1557	Australian requirements for markings and placards to ground personnel are limited and do not address ground operations such as towing.
<b>PART IV</b>		
2.2.1.2	CAR (1998) Part 27	FAR 27 does not specifically address normal piloting skills as in FAR 29.45(a).
2.2.2	CAR (1998) Part 27 and 29 FAR 27 and 29	Australian design requirements for helicopters are not based on operational performance classes I, II and III but on performance abilities classified in categories A and B.
2.2.2.1(b)	CAR (1998) Part 27	For small helicopters, no specific requirements for minimum performance at all stages of take-off and climb to be sufficient to ensure that under conditions of operation departing slightly from the idealized conditions for which data are scheduled (2.2.3), the departure from the scheduled values is not disproportionate, as required for large helicopters in FAR 29.51.
2.2.3.2(b)	CAR (1998) Part 27 and 29 FAR 27 and 29	Airworthiness requirements for helicopters do not address helicopters with three engines or more.
4.1.6(e)	CAR (1998) Part 27 and 29 FAR 27 and 29	The Australian requirements do not provide for fire protection/prevention criteria of cabin interior furnishing materials used during major refurbishing.
6.7	CAR (1998) Part 27 FAR 27	For small helicopters, engine restart capabilities only required for category A certification.
6.8.5	CAR (1998) Part 27 FAR 27	No specific fire extinguishment requirements in small piston engine helicopters.

– END –