



# ASRA

AUSTRALIAN SPORT ROTORCRAFT ASSOCIATION INCORPORATED

ABN: 53 412 417 012

## TRANSITION TO LIFE UNDER CASR PART 103 BULLETIN No. 2

This bulletin supplements the 7-page 'ASRA Transition to Part 103' bulletin emailed to all members in mid-April this year.

### PART 1 - RECAP

1. The 7-page bulletin issued in April this year (viewable on the ASRA website if you have mislaid it) detailed CASA's shift away from relying on regulatory Exemptions for the management of recreational aircraft in Australia by progressively replacing the Exemptions with new Regulations giving positive rights to recreational aviators but also imposing responsibilities and burdens intended to bring the recreational aviation community more into line with conventional general aviation.
2. CASR Part 103 formally commenced operation as from 2 December 2021, but the recreational aviation Exemptions are also still in place and will continue to operate through to at least 1 December 2025.
3. In fact, the Exemptions will for the time being remain our "bible", with CASR Part 103 being mostly dormant while CASA completes the overdue task of finalising the Part 103 Manual of Standards. As explained previously, 'Manuals of Standards' are currently the CASA-preferred method of explaining to aviation communities what CASA expects and how CASA requires people to carry out their activities to meet CASA expectations. Put another way, while CASR Part 103 provides the basic regulatory skeleton for Australian recreational aviation, the Part 103 Manual of Standards (MOS) will be the flesh and blood that makes it function.
4. Several months ago, CASA announced to the recreational aviation associations that the **earliest** commencement date for the Part 103 MOS will be **1 December 2025**.

### PART 2 - IMPLICATIONS OF THE-NOW 4 YEAR DELAY BETWEEN THE COMMENCEMENT OF PART 103 AND THE FINAL INTRODUCTION OF THE PART 103 MOS

5. As explained above, CASA continues to regulate recreational aviation by using the carry-over Exemptions. As detailed in the previous edition of Gyro News, readers should be aware that the current Exemptions applying to gyros are: 'Civil Aviation Order 95.12.1 (Exemptions from the CAR and CASR - LSA Gyroplanes and ASRA-compliant Gyroplanes) Instrument 2021, and 'Civil Aviation Order 95.12 (Exemptions from CAR and CASR — Gyroplanes Not Exceeding 250 kg) Instrument 2021'.
6. Each of these 2 legislative Instruments was amended in December 2023 by the 'Civil Aviation Orders (CAO 95 Series) (Gyroplanes and Other Measures) Amendment Instrument 2023. These documents are Google-searchable using their precise names, viewable and downloadable from the Federal Register of Legislation.
7. Meanwhile, in September 2021, CASA had issued to the associations a 139-page 'Exposure Draft' of a 'Part 103 Manual of Standards' and created a Part 103 Technical Working Group (TWG) comprising CASA staffers together with industry and association representatives. The TWG met regularly by video conferencing throughout 2022 but increasing disputation by the associations about the content of the Part 103 MOS led to the TWG being sidelined into dormancy by early 2023.

CASA concomitantly pressures the associations to become CASR Part 149 ASAOs

8. The next development was that CASA in 2022 and 2023 placed the recreational aviation associations under considerable pressure to apply for accreditation as Aviation Self-Administering Organisations (ASAOs) under CASR Part 149, suggesting that if an association didn't get accreditation by 2nd December 2023, then their future operations could become problematic in various ways.
9. As also explained previously, ASRA set out in 2022 and 2023 to prepare a range of documentation to comply with the CASR Part 149 requirements and guidelines for accreditation.
10. The main technical document ASRA developed for the Part 149 application was the 158-page 'ASRA Technical Procedures Manual (TPM)', viewable and downloadable from the ASRA website from within the Member Zone; go to 'ASRA Documents' and 'Link to ASRA documents'; then go to column 2 'ASRA Technical Procedures Manual.' The TPM will download as a .pdf file.
11. The TPM was essentially written to codify the existing paperwork processes ASRA had evolved over the past 20 years, as well as to comply with the airworthiness and maintenance expectations contained in the September 2021 Part 103 Manual of Standards Exposure Draft.
12. The ASRA TPM was approved by CASA in late November 2023 and is now a CASA-controlled document, meaning that ASRA cannot change it without CASA approval.
13. A further development in September this year was that CASA announced that it was reconstituting the dormant Part 103 Technical Working Group, expected to reconvene shortly, with the intention of finalizing the still-unpublished Part 103 final Manual of Standards.
14. At time of writing, it is not known whether the reconstituted Part 103 TWG will be a success, or whether it will once again falter under the weight of increasing disputation between CASA and the associations.

PART 3 - ASRA's EVOLVED STRATEGY TO COPE WITH THE  
CASA RE-WRITE OF THE PART 103 MOS

15. ASRA's system of maintenance as detailed in the ASRA TPM is now "locked in" because it is enshrined as a CASA controlled document.
16. Mindful that the ASRA system of maintenance detailed in the TPM was developed to conform to the 2021' Part 103 Manual of Standards Exposure Draft', ASRA now asks the rhetorical question:
 

***'What will happen if the final version of the CASA Part 103 MOS significantly varies from the airworthiness and maintenance expectations within the 2021 Draft MOS?'***
17. The answer to this question will not be known until late 2025 at best. In the meantime, ASRA's policy position is as follows:

1. **ASRA WILL FOLLOW ITS APPROVED SYSTEM OF MAINTENANCE AS DETAILED WITHIN THE CASA-APPROVED TPM UNTIL FURTHER NOTICE;**
2. **ASRA WILL CONTINUE OPERATING NORMALLY WITH T.A. INSPECTION PROCESSES UNCHANGED FOR THE TIME BEING;**
3. **ASRA WILL PARTICIPATE IN THE RECONVENED CASA PART 103 TWG TO ROBUSTLY ADVOCATE FOR PRESERVATION OF ITS PRESENT**

## AIRWORTHINESS AND MAINTENANCE PROCESSES; AND

### 4. ASRA WILL CONTINUE TO RESIST ANY CASA ATTEMPTS TO COMPULSORILY IMPOSE THIRD-PARTY MAINTENANCE EXPECTATIONS ON RECREATIONAL AVIATION.

18. It is understood that RAAus is adopting a similar policy position, identically determined to thwart any attempt by CASA to over-reach into what is currently a successful self-managed sector.

#### Suggestions for ASRA members

19. A very clear concept enshrined in the 2021 Exposure Draft Part 103 MOS was a CASA expectation that recreational aviation needed to engage in better technical record-keeping and technical surveillance. The draft MOS also emphasised the desirability of standardised processes and standardised paperwork.

20. ASRA took careful note of those expectations, and incorporated the following processes into the TPM:

a. the necessity for a record of the identity of the person who undertakes the aircraft daily inspection for each day it is in use (see the new F008 form at TPM pages 114 and 115);

b. ASRA decided to make the F008 doubly useful by adapting it to also record relevant flight or trip details along the lines of similar forms universally used in general, commercial and military aviation. The underlying intention was to make the F008 a familiar type of document instantly recognizable by CASA officials during ramp checks;

c. a formal requirement that a dedicated **Annual Inspection** be undertaken, as evidenced on the new ASRA Form F007 'Release to Service' (see ASRA TPM pages 111 to 113, and also see Section 35, pages 120 to 129). An extremely important distinction between general aviation and ASRA is that ***CASA has approved that gyro owners can undertake and sign off their own Annual Inspections***, if they have the knowledge and tools and equipment to do so. ASRA also permits that owners can be assisted by others such as AMEs, LAMEs, T.A.s or other specialists, but at the end of the day it is the owner's signature that goes on the F007; and

d. ASRA also preserved the pre-existing right of gyro owners to build and repair their own gyroplanes, and to hybridise gyros as they see fit. See generally TPM sections 37, 38, 39, pages 133 to 144.

ASRA MEMBERS ARE ENCOURAGED TO BECOME FAMILIAR WITH THE TPM AND ESPECIALLY THE DAILY AND ANNUAL INSPECTIONS, AS WELL AS THE F007 AND F008 FORMS. PLEASE NOTE THAT THE ASRA COMPUTER SYSTEM AND DATABASE IS BEING REVISED TO ENABLE INDIVIDUALLY SERIAL-NUMBERS F007 'RELEASE TO SERVICE' FORMS TO BE CREATED WITHIN THE ASRA DATABASE FOR PRINTING-OUT BY GYRO OWNERS.

GIVEN THAT THE CASA PART 103 MOS IS STILL DELAYED FOR ONE MORE YEAR, ASRA WILL BE USING 2025 TO TRIAL THESE CHANGES. **ASRA WILL NOT BE MAKING ANNUAL INSPECTIONS COMPULSORY UNTIL AT LEAST 6 TO 8 MONTHS AFTER THE PUBLICATION OF THE FINALIZED PART 103 MOS IN DECEMBER 2025 OR LATER.**

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