



SILSOE PTY LTD
(A.C.N. 010 336 428)
(A.B.N. 66 010 336 428)
Trading as

McCLYMONT AIRCRAFT ENGINEERING

DALKEITH
LONGREACH QLD 4730 AUSTRALIA

CASA CERTIFICATE OF APPROVAL No 3133

Telephone 61 7 4658 9281

E-mail Mac.Dalkeith@bigpond.com

Submission to the Aviation Safety Regulation Review

Introduction:

I am the owner and Chief Engineer of the above company which has been carrying out General Aviation maintenance since 1980.

I served a 5 year apprenticeship with Trans Australia Airlines and subsequently worked for TAA for a total of 13 years, concluding with the position of Station Engineer in charge of TAA's Mt Isa base.

In addition to L.A.M.E. licences, I hold a Commercial pilots licence but currently only operate as a Private pilot with a Class 2 medical.

Issues:

I commend to the Review Panel the submission made by AMROBA which covers more issues with greater depth than this submission.

The aircraft that I maintain are all of USA manufacture as are most G.A. aircraft in Australia. It is totally illogical that the rules that we operate under are at best European and at worst a hybrid of European rules with unique Australian changes and a few FAA references thrown in.

For at least 20 years CASA and its predecessors have been rewriting, stopping, restarting and changing direction with the rules that we operate under. For a small maintenance organisation with no administration staff it is impossible to keep up with the changes. The time I have available for administrative type work is fully taken up with researching information such as Airworthiness Directives, Service Bulletins etc, that have a direct bearing on the work I am doing.

CASA provide no training or information sessions on their rule changes for maintenance organisations in remote areas. They do provide these services for pilots but do not cover items of specific interest to maintainers. CASA promulgates rule changes on their web site and expects everyone to have read & digested every change; they need to do more than that.

In the past CASA auditors would try to keep us informed, primarily during their audits of our facilities. This latter assistance was not forthcoming at our last audit & was replaced instead by a belligerent attitude focused on prosecution and punishment rather than assistance.

I urge the Panel to recommend that CASA be required to provide briefing and updates to Maintenance and Repair Organisations similar to those provided to pilots by the Aviation Safety Seminar program. Those seminars should be provided in remote as well as coastal areas.

I also ask that the panel recommend that Australia's GA industry be governed by rules based on the USA FAA regulations that most of the GA aircraft have been certified under.

Leadership:

Since opening this business in 1980 I have had contact with many Airworthiness Inspectors. Until recently they were always helpful and their demands were justified, backed up with information and explained. Assistance was always available when needed to bring the organisation into full compliance with their requirements.

Under the current top level management CASA has taken a much more belligerent attitude to safety regulation. This has flowed from the top down to the staff levels that industry deals with and is a serious impediment to good safety regulation.

The past CASA Airworthiness Inspectors had been helpful and informative while carrying out their duties. This is not to say that they would overlook deficiencies, but they would offer guidance on how a better safety outcome could be achieved and the rules complied with. With the current "attack" type attitude they offer no guidance only Non Compliance Notices. They leave maintainers to flounder through reams of regulations to try to ascertain what will satisfy the AWI's opinion of the meaning of a rule, and many times it seems to be just that – an opinion.

I request that the Panel recommend that CASA staff who have direct dealings with industry stop their aggressive and intimidatory approach, and instead concentrate on assisting industry to become regulation compliant and safe in operation.

Time Factors & Costs:

The regulations as they are currently enforced appear to leave large areas open to interpretation by AWI's who will accept no alternative view.

Example 1: At our most recent audit the AWI required that I submit a site plan with the amendments he required to our Procedures Manual. This was despite the fact that CASA AWI's had been inspecting the hangar for over 30 years and were familiar with it. A site plan is normally only required for a new application where CASA have not visited the location.

The site plan had to show all storage, equipment, machines etc. That plan is now part of my Procedures Manual so if I want to store my jacks on the opposite side of the hangar I first have to submit an amendment to the Procedures Manual to CASA for prior approval. That is an unwarranted intrusion into how I run my business and a totally unnecessary cost.

Example 2: Test Equipment calibration periods are normally set by the MRO taking into consideration the frequency of equipment use and past calibration history. An AWI demanded that I reduce the time interval between calibrations without any consideration of the low utilisation of the equipment. The cost of these calibrations is significant and now has to be borne more frequently.

I request that the Panel recommend that CASA staff do not use any discretionary powers that they may have to enforce requirements that are not contained in the rules.

This organisation is now required to have a Drug and Alcohol Management Plan. This is a very small one LAME operation, there is no one to test me or assess me, therefore the whole exercise is pointless in this instance. CASA developed a DAMP for small organisations which was a help but it is still pointless, however I have to submit regular reports to CASA that I have not been drunk on the job!

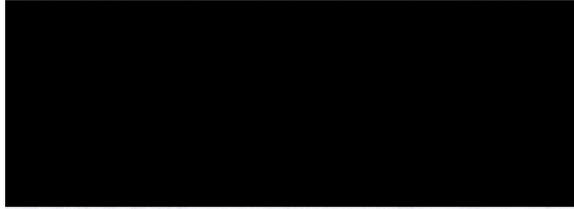
If anything will drive me to drink it is useless DAMP reports. It is another administrative job that I don't need.

Medical:

I often fly customer's aircraft to & from maintenance. I needed to renew my pilots licence medical certificate with a Designated Medical Examiner. I found that despite the lists on the CASA web site there is not a DAME in Queensland west of Charters Towers, Emerald and Roma. I have contacted CASA about the deficiency but they say that is not their responsibility. I have asked local GP's if they would consider

qualifying but none are interested – apparently because of the bureaucratic hurdles.

This then causes another significant cost as I have to travel over 1000 km on a return trip to Emerald to get a medical examination done.



Mac McClymont L.A.M.E.
Chief Engineer