Australian Industry and Skills Committee

AVIATION COMMERCIAL PILOT REGULATORY UPDATE

Case for Change

Name of allocated IRC: Aviation Industry Reference Committee
Name of the SSO: Australian Industry Standards

1. Administrative information

*For a list of the products proposed to be reviewed as part of this project, please see **Attachment A**.*

Name of IRC(s):	Aviation Industry Reference Committee
Name of SSO:	Australian Industry Standards

1.1 Name and code of Training Package(s) examined to determine change is required

AVI Aviation Training Package.

2. The Case for Change

*For information on the job roles to be supported through the proposed qualifications updates, enrolments data, completion rates, and the number of RTOs delivering these qualifications please see **Attachment B**.*

2.1 Rationale for change

Stalling and spinning are aerodynamic phenomena which remain common causes of fatalities due to departures from controlled flight in all categories of aeroplanes. Unrecognised stall or poor recovery technique continue to be contributing factors even in transport category accidents.

Stall - spin related accidents continue to account for approximately one-quarter of all fatal general aviation accidents worldwide, including many during dual flight training. Most unintentional spins other than during dual instruction, occur at altitudes too low for recovery, generally on climb after take-off and turns onto final approach.

The purpose of spin avoidance and stall recovery training, whether for introductory training or as part of upset prevention and recovery training, is to prepare pilots to fly at speeds below the speed for minimum drag. It also enables skills and knowledge , and to recognise and recover from approaching stall and full stall, including wing drop at the stall in the context of situations in which it is most likely to occur.

This Case for Change proposes a review of three aviation Units of Competency that contain aspects of 'spinning', in particular 'incipient spin' to address changes to regulations being published in 2021.

Given the safety risks associated with the application of spinning, it is critical that this is addressed to ensure that training and assessment is appropriate, and it is consistent with the regulations and standards. Flight/Flight training safety

This Case for Change is focused on reviewing existing AVI Aviation Training Package products, relevant to the areas of Commercial Pilot Licence - Aeroplane and Aerobatic Pilot.

This Case for Change is predicated on two key areas of safety and changes to legislation.

Implications for not making the change to the proposed three Units of Competency, based on Part 61, would mean a safety risk for flight instructor and students during training flights.

2.2 Evidence for change

An ATSB investigation into a fatal accident which occurred on 26 September 2017, during a Recreational Pilot Licence practice flight test found the instructor and the student were likely conducting advanced stall recovery training – a lesson which probably included intentionally initiating incipient spins in an aircraft prohibited from intentional spin. At the time of this accident, aircraft manufacturer definition of intentional spin or incipient spin was not consistent with CASA Flight Instructor Manual.

The Aviation IRC recommends that the products listed in Attachment A be approved for review, based on the following evidence:

- Some flight training organisations may be conducting incipient spin training in aircraft not approved for intentional spinning, which could result in a serious accident
- There are fewer flight instructors and a shrinking fleet of aircraft capable of delivering spin recovery
- Training and testing of spinning is currently a core skills outcome. Requirement for all training to be conducted in aircraft certified for intentional spinning, would be cost prohibitive to students and industry
- Training for slow flight, stalling and stall with a wing drop is a more appropriate vocational outcome for commercial pilots

2.3 Consideration of existing products

This Case for Change is proposing the review of existing units in the Training Package Products only.

2.4 Approach to streamlining and rationalisation of the training products being reviewed

This project does not contain Training Package products that require streamlining or rationalisation. This Case for Change will only address the regulatory update relating to flight training safety.

3. Stakeholder consultation

3.1 Stakeholder consultation undertaken in the development of Case for Change

*For a full list of industry-specific stakeholders that actively participated in the stakeholder consultation process undertaken to develop the Case for Change, please see **Attachment C**.*

Key individual and group stakeholders who were consulted or provided information in the development of this Case for Change during or industry engagement period from March 1- 26.

The information contained within the Case for Change, was made available to State Training Authorities for comment and feedback through the Australian Industry Standards website and registered stakeholder communications.

Development of the Case for Change involved consultation with stakeholders via the following communication mechanisms:

- Stakeholder webinars
- Face to Face meetings (Virtual)
- AIS Website
- Stakeholder networks
- Teleconferences
- Emails

Stakeholders include industry representatives from across the states and include rural, regional and remote. Our targeted communications strategy including recording registrants for the aviation webinar on March 15 showed the breath of engagement.

3.2 Evidence of Industry Support

*For a list of the issues raised by stakeholders during consultation and the IRC's response to these, please see **Attachment D.***

Evidence from industry and the aviation regulator CASA supports the review of three Units of Competency that contain 'incipient spin' and replace with CASA approved terminology that is consistent with industry practice. Given the safety risks associated with the application of spinning, it is critical that this is addressed to ensure that training and assessment is appropriate and consistent with the regulations and standards.

Please see attachment D.

3.3 Proposed stakeholder consultation strategy for project

*Note: For a full list of industry-specific stakeholders who are planned to be contacted to participate in the stakeholder consultation process undertaken for this project, please see **Attachment E**.*

Key Industry stakeholders have been identified in consultation with industry regulators, associations, and the Aviation IRC.

AIS, on behalf of the Aviation IRC, will promote the opportunity to contribute through stakeholder webinars, the AIS website, EDM's, AIS newsletter and public notifications. Stakeholders will also be notified of key milestones throughout the life of the project, including requests for feedback on draft materials.

Stakeholder engagement and consultation will occur over the life of the project via a combination of the following methods:

- Direct engagement: Face to face consultations, Site visits, Phone, emails, video/teleconferencing meetings
- Industry forums and conferences
- Webinars
- Online feedback mechanisms
- STA direct engagement

Given the size of Australia and that all stakeholders are not centrally located in major cities, a range of consultation strategies will be used so stakeholders in rural, regional and remote areas, and in smaller jurisdictions have multiple avenues to provide feedback. The project will leverage CASA and Airline Associations to ensure maximum reach on consultation.

4. Licencing or regulatory linkages

The flight crew licence is the first qualification obtained by a pilot and indicates the level of training and assessment completed.

A Part 61 flight crew licence lists each licence level and the associated aircraft category rating. For example, a commercial pilot licence (CPL) aeroplane (A) or CPL helicopter (H).

A pilot's competency is determined through a combination of training and assessment. The level of complexity and depth of knowledge increases depending on the licence level, rating or endorsement a candidate is working towards.

5. Project implementation

5.1 Prioritisation category

Whilst this review be progressed as a routine project it can be completed very efficiently as a separate release.

In line with the AISC Prioritisation Report and to coordinate the release of updated products, the IRC recommends a routine update and implementation of this project in a fast timeline given the work involved.

5.2 Project milestones

Key project milestones include:

- AISC project approval – June 2021
- Draft 1 consultation – August 2021
- Stakeholder validation – –September 2021
- Quality Assurance – September 2021
- Final consultation with states and territories – October 2022
- CfE submitted for approval – December 2021.

5.3 Delivery or implementation issues

Some of the delivery and implementation issues which have been raised by stakeholders include the following:

- Engaging learners is practical components may be an issue for learners who cannot access resources and facilities as they need to
- Consistent training delivery – maintaining consistency in training delivery and assessment is an issues in many programs. It is expected that RTOs will apply the appropriate volume of learning to the courses they deliver
- Discovering the sustainability of a training program is challenging at best. RTO professionals must find and implement an effective way to ensure skills are learned and applied in the real work environment
- How training programs are impacting their organization is challenging to assess which metrics to use, how to incorporate them into post-training assessments, how and when to follow up, and how to adjust future training based on the results
- There are a range of unique delivery methods needed for solid skill development to occur. It is important to ask the right questions and identify the desired outcomes when planning each training session. This presents challenges for RTO where resources are limited

How issues will be considered as part of the update/review: Where appropriate advice and suggestions will be provided in the Companion Volume Implementation Guide. In addition, links to key resources will also be included.

6. Implementing the Skills Minister's Priority reforms for Training Packages (2015 and October 2020)

Training delivery information is provided within the supporting Companion Volume Implementation Guide. This will be updated with any new information related to the changes.

This new qualification will support recognition of Aeroplane Pilots within multiple sectors.

This project is a change to two Units of Competency in the qualification based on a regulatory update. The qualification meets individuals operating as a pilot in any sector to transfer acquired skills and knowledge into multiple sectors and/or operating environments.

This Case for Change proposes a review of the Diploma of Aviation (Commercial Pilot Licence - Aeroplane) only. Aviation Skill Sets continue to be available to the aviation industry who use them as appropriate.

This Case for Change was agreed to by the Aviation IRC

Name of Chair	Stephen Leahy
Signature of Chair	
Date	

Attachment A: Training Package components to change

SSO: Australian Industry Standards

Contact details: David Dixon - Chief Operating Officer

Date submitted: TBA

Project number	Project Name	Qualification/ Unit / Skillset	Code	Title	Details of last review *(endorsement date, nature of this update transition, review, establishment)*	Change Required
4	Commercial Pilot: Review of Units of Competency to address changes in Part 61 manual of Standards	Unit	AVIY0046Y	Execute advanced aeroplane manoeuvres and procedures	13/Aug/2019 - Review	Update
4	Commercial Pilot: Review of Units of Competency to address changes in Part 61 manual of Standards	Unit	AVILIC0003Y	Licence to operate a commercial aeroplane	13/Aug/2019 - Review	Update
4	Commercial Pilot: Review of Units of Competency to address changes in Part 61 manual of Standards	Qualification	AVI50219Y	Diploma of Aviation (Commercial Pilot Licence - Aeroplane)	13/Aug/2019 - Review	Update
4	Commercial Pilot: Review of Units of Competency to address changes in Part 61 manual of Standards	Unit	AVIY0017Y	Control aircraft in advanced flight manoeuvres	01/Mar/2016 - Transition	Update

Attachment B: Job role, enrolment information, the number of RTOs currently delivering these qualifications

Please set out the job roles to be supported through the updated qualifications, enrolment data over the past three years in which data is available for each qualification, completion rates for each qualification, and the number of RTOs delivering these qualifications.

Job role	Qualification to be updated to support the job role	Enrolment data (for the past three years)	Completion rates (for the past three years)	Number of RTOs delivering (for the past three years)
	AVIY0046Y Execute advanced aeroplane manoeuvres and procedures	4851	2097	43
	AVILIC0003Y Licence to operate a commercial aeroplane	3243	1368	42
2311, Air Transport Professionals	AVI50219Y Diploma of Aviation (Commercial Pilot Licence - Aeroplane)	6531	1531	42
	AVIY0017Y Control aircraft in advanced flight manoeuvres	0	0	0

Attachment C: List of stakeholders that actively participated in the consultation process of the Case for Change

Active participation has included 41 stakeholders from the following organisations across all states and territories within Australia:

- Industry Reference Committee (IRC) Representatives
- Employers (Non-IRC)
- Peak Industry Bodies
- Unions
- Regulators
- RTOs
- Other/Consultants

Attachment D: Issues Raised by Stakeholders during consultation on the development of the Case for Change

Stakeholder Type	Issues Raised	IRC's Response to Issues Raised
Industry Reference Committee (IRC) Representatives	There were no issues raised at this time	N/A
Peak Industry Bodies	There were no issues raised at this time	N/A
Employers (Non-IRC)	Strategies to help pilots that have been out of work due to the pandemic back to work as a pilot?	The IRC has reviewed the level of Skill Sets as micro credential that can be undertaken where this is needed. The current level of Skill Sets addresses a number of areas. One aspect to assist in is the aspect of Recognition of Prior Learning (RPL) as a mechanism to transition pilots to other occupation areas.
Regulators	There were no issues raised at this time	N/A
Registered Training Organisations (RTOs)	Why would a student pilot choose to complete a Diploma of Aviation (Commercial Pilot - Aeroplane) instead of simply doing a commercial pilot licence at their non-RTO flying school?	The Aviation is reviewing this area with CASA.
Training Boards/Other	There were no issues raised at this time	N/A
State and Territory Training Authorities (STAs)	There were no issues raised at this time	N/A
Unions	There were no issues raised at this time	N/A

Attachment E: List of stakeholders to be contacted as part of the development of the Case for Endorsement

The Case for Endorsement development will involve contacting relevant stakeholders from the following organisations across all states and territories within Australia:

- Industry Reference Committee (IRC) Representatives
- Australian Defence College
- Employers (Non-IRC)
- Unions
- Regulators
- State Training Authorities
- RTOs
- Other/Consultants