



Australian Government  
Department of Defence



# Defence Aviation Safety Authority

## ADVISORY CIRCULAR

**AC 004/2018**

**AIRWORTHINESS RECOGNITION IN THE DASP**

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v1.0 – 21 September 2018

An Advisory Circular is issued by the Authority to promulgate important information to the Defence Aviation community, but does not mandate any action. This includes informing the community on aviation safety / airworthiness matters, information that enhances compliance understanding for existing regulation, or policy guidance for aviation issues not yet regulated that requires further understanding.

## **Audience**

This Advisory Circular (AC) is relevant to:

- organisations managing the acquisition of, and major modifications to, Defence aircraft platforms
- Continuing Airworthiness Management Organisations (CAMOs) approved by DASA and organisations carrying out activities on their behalf
- maintenance organisations approved by DASA.

## **Purpose**

The purpose of this AC is to promote efficiency and flexibility by assisting the Defence aviation community to exploit the airworthiness recognition provisions of the Defence Aviation Safety Regulation.

## **Further information**

For further information on this AC, contact DAVREG-DASA at [dasa.dasr@defence.gov.au](mailto:dasa.dasr@defence.gov.au)

**Status**

This AC will remain current until cancelled by DASA.

Version	Date Approved	Approved By	Details
1.0	21 September 2018	COL R Crowe A/DG DASA	Initial release

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# 1 Reference material

## 1.1 Acronyms

The acronyms and abbreviations used in this AC are listed in the table below.

<b>Acronym</b>	<b>Description</b>
AC	Advisory Circular
AD	Airworthiness Directive
AMC	Acceptable Means of Compliance
CAME	Continuing Airworthiness Management Exposition
CAMO	Continuing Airworthiness Management Organisation
CASA	Civil Aviation Safety Authority
CoA	Certificate of Airworthiness
CRS	Certificate of Release to Service
DASA	Defence Aviation Safety Authority
DASP	Defence Aviation Safety Program
DASR	Defence Aviation Safety Regulation
EASA	European Aviation Safety Agency
FAA	Federal Aviation Administration
FMS	Foreign Military Sales
GM	Guidance Material
MAA	Military Airworthiness Authority
MDO	Military Design Organisation
MPTF	Military Permit to Fly
MTC	Military Type-Certificate
MSTC	Military Supplemental Type-Certificate
NAA	National Aviation Authority
OEM	Original Equipment Manufacturer
SB	Service Bulletin
TC	Type-Certificate
TCAE	Type Continued Airworthiness Exposition

## 1.2 Definitions

Terms that have specific meaning within this AC are defined in the table below.

Term	Definition
airworthiness authority	An organisation that applies regulations or policies to control the integrity of the personnel, processes and products related to Initial, Continued and Continuing Airworthiness and carries out corresponding safety assurance activities.
airworthiness instrument	A document issued by, or on behalf of, an airworthiness authority. An airworthiness instrument provides assurance of the airworthiness of a product. e.g. an aircraft's design or the conformance of an individual tail to a design.
airworthiness system	A system of controls for personnel, process and product integrity applied by an airworthiness authority, inclusive of the established regulatory or policy framework.
alternate (instrument/artefact)	An instrument or artefact that is issued when a native instrument/artefact cannot be. Not identified in recognition certificate. See paragraph 2.7.4.
artefact	A document, other than an airworthiness instrument, issued by an organisation with the permission of an airworthiness authority. An artefact provides evidence that airworthiness has been ensured in the provision of a product or service.
native (instrument/artefact)	An instrument or artefact that is normally issued by an airworthiness authority or an organisation in accordance with airworthiness regulation/policy. Identified in recognition certificate.

## 1.3 References

1.3.1 EMAD R – Recognition process ed. 2.0

1.3.2 AFIC AIR STD 2003 Edition 1.0

1.3.3 AAP 8000.011 Defence Aviation Safety Regulations

1.3.4 Advisory Circular 002/2016 Aviation Command Responsibilities under DASR

1.3.5 Advisory Circular 002/2018 Application for Military Type Certificates and Major Design Changes

Unless specified otherwise, all regulation references in this AC refer to the Defence Aviation Safety Regulation (DASR).

## 2 Introduction

### 2.1 Overview

- 2.1.1 Joint Directive 24/2016 establishes the Defence Aviation safety framework. Under the framework, commanders and managers are accountable for ensuring that aviation systems under their command or control are designed, produced and maintained to approved standards by competent and authorised personnel acting on behalf of approved organisations. The Defence Aviation Safety Program (DASP) establishes a corresponding system of standards, authorisations and approvals.
- 2.1.2 The DASP is administered by the Defence Aviation Safety Authority (DASA). In administering the aspects of the DASP related to aircraft design, production and maintenance, DASA is carrying out the role of an airworthiness authority.
- 2.1.3 To promote efficiency and flexibility in the DASP, DASA may acknowledge that products and services from other airworthiness authorities and their respective systems are acceptable. This concept is known as *airworthiness recognition* and is provided for by the Defence Aviation Safety Regulation (DASR).
- 2.1.4 This Advisory Circular (AC) describes the application of airworthiness recognition in the DASP and how the corresponding provisions of the DASR can be exploited in the acquisition, sustainment and operation of Defence Aviation platforms.

### 2.2 Scope of AC

- 2.2.1 The internationally accepted definition of 'airworthiness' is confined to those aspects related to:
- an aircraft's design being safe and remaining so throughout its service life (*Initial and Continued Airworthiness*)
  - an aircraft continuing to conform to its design (*Continuing Airworthiness*).
- 2.2.2 The Operational Airworthiness elements of the DASP are outside the scope of this AC. For the sake of readability, all instances of 'airworthiness' and 'recognition' in this AC refer only to Initial, Continued and Continuing Airworthiness.

## 2.3 Recognition in the DASP

### 2.3.1 Approach to recognition

2.3.1.1 DASA recognises other airworthiness authorities and the controls for personnel, process and product integrity that comprise their airworthiness system. The objective of recognition is to promote efficiency and flexibility while maintaining an established level of safety assurance.

2.3.1.2 DASA's recognition strategy further promotes efficiency through a top-down approach which may be described in terms of three tiers:

- **Tier 1.** DASA assesses whether another authority and associated regulatory system applies a credible and defensible system of controls against hazards in Initial, Continued and Continuing Airworthiness. Where this is found to be the case, the authority is recognised as competent and a recognition certificate is issued.
- **Tier 2.** DASA identifies and assesses the appreciable differences between the other authority's airworthiness system and its own within specific areas such as aircraft design, certification, production and maintenance. These differences are used to provide guidance to the community on how to safely exploit recognition provisions. This guidance is in the form of the recognition scope, conditions and caveats which are published as annexes to the recognition certificates.
- **Tier 3.** The community exploits recognition provisions, using the information in the applicable recognition certificate annex to ensure the suitability of their specific arrangements.

2.3.1.3 The top-down approach differs from that applied by some other airworthiness authorities whose recognition activities and provisions are often specific to a platform, product or service.

### 2.3.2 Benefits of recognition

2.3.2.1 **Efficiency for customers.** The benefit of the top-down approach is that Tier 1 is not specific to the airworthiness system applied by the authority, and Tier 2 is not specific to the platforms for which products and services might be sought. This provides broad and upfront recognition for many types of products and services, across all potential aircraft types. This enables Defence organisations to receive products or services without needing to assess, or seek recognition of, an airworthiness authority or its airworthiness system. Receiving organisations can instead focus on ensuring the suitability of their specific arrangements, avoiding the potential for duplication of work.

2.3.2.2 **Efficiency for service providers.** The application of an airworthiness system places a burden of effort on the organisations providing products and

services within it. Such organisations develop procedures and evidence to meet the requirements of each system within which they operate. These organisations often need to maintain multiple unique sets of procedures, are subject to multiple on-site inspections for the same scope of work and are required to provide similar product assurance evidence to different Authorities that meet the same airworthiness outcomes for the same platform. This adds no safety benefit. Rather it introduces unnecessary overhead and may instead reduce safety by promoting complexity in organisations' process and product assurance evidence. Recognition reduces the oversight burden from multiple airworthiness authorities and may alleviate the need for a service provider to attain multiple airworthiness authorities' approvals.

2.3.2.3 **Efficiency for DASA.** DASA is not resourced to fulfil its airworthiness safety assurance obligations in the absence of safety assurance provided by external airworthiness authorities. When the community applies recognition provisions, DASA can rely on or take credit from the existing safety assurance activities carried out by the recognised authority.

### 2.3.3 Limits of recognition

2.3.3.1 The following limits apply to DASA's recognition activities:

- a. **Service provider organisations.** DASA does not assess individual service provider organisations operating within recognised systems. Further, recognition provisions are only applicable to organisations working within an airworthiness authority's system.
- b. **Certification standards.** When establishing recognition of an external airworthiness authority, DASA does not assess the type-certification standards applied to individual platforms by a recognised authority. The suitability of certification standards is considered during the Type-Certificate planning and application process.
- c. **Explosive ordnance.** Other organisations that fulfil the role of an airworthiness authority may also apply safety assurance to the design, manufacture and maintenance of explosive ordnance. These activities, to the extent that they do not concern the airworthiness of aircraft, are outside the scope of DASA's recognition provisions.

## 2.4 Recognition nomenclature

### 2.4.1 Airworthiness authorities

2.4.1.1 An airworthiness authority is an organisation that applies regulations or policies to control the integrity of the personnel, processes and products

related to Initial, Continued and Continuing Airworthiness and carries out corresponding safety assurance activities.

- 2.4.1.2 Military Airworthiness Authorities (MAAs) may comprise multiple organisations that are separately responsible for Initial and Continued Airworthiness, Continuing Airworthiness, safety assurance, etc.
- 2.4.1.3 Civil airworthiness authorities are usually embedded within a country's National Aviation Authority (NAA). An exception is the European Aviation Safety Agency (EASA) which is a supranational organisation.

### 2.4.2 **Airworthiness systems**

- 2.4.2.1 An airworthiness system is the system of controls for personnel, process and product integrity applied by an airworthiness authority, inclusive of the established regulatory or policy framework. A person or organisation is considered to be working within a given airworthiness system if it is subject to the controls applicable within that system.

## 2.5 **Airworthiness controls in the DASP**

- 2.5.1 The DASP includes a system of controls for the integrity of the personnel, processes and products relevant to Initial, Continued and Continuing Airworthiness. These are the maintenance personnel licenses, organisation approvals, airworthiness instruments and artefacts described by the relevant parts of the DASR.
- 2.5.2 **Maintenance personnel licenses.** Maintenance personnel licenses are issued by DASA to provide assurance that personnel carrying out maintenance activities have appropriate qualifications, training and experience.
- 2.5.3 **Organisation approvals.** Organisation approvals are granted by DASA to organisations that carry out design, production and continuing airworthiness management and maintenance activities. An approval provides assurance that the organisation applies appropriate processes in performing the relevant activities and may grant specific privileges to the organisation. An organisation approval also provides assurance of personnel integrity, as nominated management personnel within the organisation must be accepted by DASA.
- 2.5.4 **Airworthiness instruments.** Airworthiness instruments are documents issued by DASA or by another organisation under privilege from DASA. An airworthiness instrument provides assurance of the airworthiness of a product, e.g. an aircraft's design or the conformance of an individual tail to a design. The airworthiness instruments in the DASP are:

- Military Type-Certificate (MTC) and Military Restricted Type-Certificate
- Military Supplemental Type-Certificate (MSTC)
- approval of change to type design
- approval of repair design
- Certificate of Airworthiness (CoA)
- Military Permit to Fly (MPTF).

2.5.5 **Artefacts.** Artefacts are documents, other than airworthiness instruments, issued under the privilege of an organisation approval granted by DASA. An artefact is evidence that airworthiness has been ensured in the provision of a product or service. Examples of artefacts that may be issued within the DASP are:

- updates to instructions for continuing airworthiness issued under the privilege of a DASA Military Design Organisation (MDO) Approval
- a component Certificate of Release to Service (Form 1) issued under the privilege of a DASA maintenance organisation approval.

## 2.6 Establishing recognition

2.6.1 In establishing recognition, DASA carries out an assessment to determine whether another airworthiness authority applies a credible and defensible airworthiness system (Tier 1). Where appropriate, DASA will accept the system's controls for personnel, process and product integrity within the DASP (Tier 2).

### 2.6.2 Recognition assessment

2.6.2.1 Where a need exists for a Defence organisation to access products and services within another airworthiness authority's system, DASA will carry out a recognition assessment of that authority. The assessment will take into account:

- the legal basis of the authority and its regulatory/policy framework
- the independence of the authority from aircraft operators
- the authority's structure and any relationships with other organisations that support its functions
- the authority's staffing, including qualifications and training
- the airworthiness regulations and policies applied by the authority
- the authority's oversight strategy, including the approval of organisations

- any delegations or privileges granted by the authority to people or organisations
- the airworthiness instruments and artefacts issued by the authority and the people or organisations within its system.

2.6.3 Each assessment is documented in a report available to Defence organisations on request. The recognition report may be a useful reference for members of the Defence aviation community seeking to better understand a particular recognised authority's airworthiness system.

#### 2.6.4 **Recognition certificates**

2.6.4.1 Where DASA's assessment of an authority supports recognition, a certificate is issued to formally establish recognition. Each certificate states the authority being recognised, the areas recognised and the recognition terms. The terms refer to the scope, conditions and caveats set out in the recognition annexes.

2.6.4.2 **Scope.** The scope defines the personnel, process and product integrity controls that are acceptable within the DASP; for example, specific types of organisation approvals or airworthiness instruments.

2.6.4.3 **Conditions.** The conditions may place specific limitations on the scope. For example, where the recognised authority applies more than one regulation suite, DASA may only accept products developed or services provided within one suite.

2.6.4.4 **Caveats.** The caveats define the minimum checks to be carried out, and measures to be put in place where appropriate, to ensure the suitability of recognition arrangements from an airworthiness perspective. The caveats highlight potential hazards to airworthiness that might be addressed by the consumer in another way; it is not expected that caveats will be strictly met in each instance.

2.6.4.5 Recognition certificates are available on the [DASA recognition web page](#). An example is provided at Annex A.

## 2.7 **Exploiting recognition provisions**

2.7.1 An organisation applying recognition provisions is responsible for ensuring the suitability of its own specific arrangements. This is applicable in all cases with the exception of the consumption of some authorities' component Certificate of Release to Service (CRS)<sup>1</sup>. The key references for the

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<sup>1</sup> See section 4.3 below.

suitability assessment are the relevant DASR clause and the applicable recognition certificate.

## 2.7.2 Recognition provisions in the DASR

2.7.2.1 Chapters 3 and 4 of this AC describe the recognition provisions of the DASR in Initial, Continued and Continuing Airworthiness. Table 1 below summarises the location of these provisions in the DASR and where the topic is described in this AC.

**Table 1 – Application of recognition in the DASR**

<b>Topic</b>	<b>DASR reference</b>	<b>AC reference</b>
Airworthiness Directives	21.A.3A	3.3
Certificates of Airworthiness	21.A.174(b)	3.4
Maintenance – aircraft	M.A.201(g)	4.2
Maintenance – components	M.A.201(g)	4.3
Military Permits to Fly	21.A.709(b)	3.5
Modifications – ‘major’	21.A.20	3.2
Modifications – ‘minor’	M.A.304(d)	4.4.5
Production – aircraft	See CoA and MPTF	
Production – components	21.A.307(a)	4.3
Repairs	M.A.304(d)	4.4
Type-certification	21.A.20	3.2

## 2.7.3 Conditional provisions

2.7.3.1 Some recognition provisions require DASA’s acceptance of the consumer’s specific arrangements. These provisions are described using phrases such as ‘DASA may accept’ and ‘DASA may agree’. In these cases, the consumer must seek DASA’s acceptance of the proposed arrangements through the applicable exposition, e.g. the Continuing Airworthiness Management Exposition (CAME), the Type Continued Airworthiness Exposition (TCAE) or directly with DASA for one-off situations.

## 2.7.4 Native and alternate instruments and artefacts

2.7.4.1 Section 2.5 lists some of the airworthiness instruments and artefacts normally issued within the DASP. When issued by an organisation, these *native* instruments and artefacts imply that:

- the organisation has DASA’s permission to issue the instrument or artefact; i.e. the appropriate scope and privilege; and

- the specific activity performed by the organisation in issuing the instrument or artefact is subject to DASA’s airworthiness assurance activities.

2.7.4.2 DASA’s recognition certificates identify the native instruments and artefacts within the recognised system. However, there are instances where these may not be available to a Defence organisation. Reasons for this may include:

- legislative restrictions due to Defence being a foreign or military customer
- slight misalignment between the organisation’s scope and the service required by Defence
- the recognised authority not applying its normal safety assurance to the activity performed for Defence and the issuance of the instrument or artefact.

2.7.4.3 In such instances, DASA may agree that a Defence organisation can accept an *alternate* instrument or artefact<sup>2</sup>. This provision is only applicable where the Defence organisation can demonstrate, to DASA’s satisfaction, that:

- a. it is not feasible for the service provider to attain a DASA organisation approval or provide the service under subcontract to an organisation holding a DASA approval;
- b. the organisation is a suitable provider of the required service; i.e. the service is within the scope of the organisation’s approval or so closely aligned that no additional hazards to airworthiness are introduced;
- c. the service is provided using the same people and processes used to provide a similar service and issue a similar instrument or artefact under the oversight of the recognised authority;
- d. the caveats set out in the relevant recognition certificate are applied to the greatest practicable extent; and
- e. any other controls necessary to ensure safety are in place.

2.7.4.4 Airworthiness authorities will usually only issue their native instruments, meaning that the concept of alternate instruments and artefacts is not generally applicable to type-certification and the approval of ‘major’ modifications.

2.7.4.5 Examples of alternate artefacts are provided in Chapter 4.

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<sup>2</sup> AMC DASR M.A.201(g), AMC DASR M.A.304(d)

## 3 Recognition in Initial and Continued Airworthiness

### 3.1 Introduction

3.1.1 This chapter describes recognition provisions of DASR 21 *Aircraft Design, Production and Certification*. These provisions will be of interest to:

- Military Type-Certificate holders
- organisations managing the acquisition of a Defence aircraft platform
- organisations integrating a ‘major’ modification to a Defence aircraft platform
- applicants for a DASA Certificate of Airworthiness or Military Permit to Fly.

### 3.2 Type-certification and ‘major’ modifications

3.2.1 Military Type-Certificates for all Defence aircraft types will be issued by DASA. All ‘major’ modifications must be approved by DASA through a Supplemental Type-Certificate or approval of a ‘major’ change to type design.

3.2.2 The application of recognition to type-certification and the approval of ‘major’ modifications is detailed in Advisory Circular 002/2018 *Application for Military Type Certificates and Major Design Changes*.

### 3.3 Airworthiness Directives

3.3.1 Other authorities’ Airworthiness Directives (ADs) are not automatically applicable to Defence aircraft. Instead, it is up to each MTC holder to ensure that relevant ADs or equivalent are monitored as part of its system for collection, investigation and analysis of data related to failures, malfunctions and defects<sup>3</sup>.

3.3.2 As a minimum, the MTC holder should monitor relevant ADs or equivalent issued by any airworthiness authority whose certification or approval was recognised by DASA in the issuance of the airworthiness instruments being held. For example:

- a. The Australian Defence type-certification of a military aircraft platform relied on the prior certification of a civil type by the European Aviation Safety Agency;

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<sup>3</sup> DASR 21.A.3A

- b. While an EASA AD issued against the civil type is not automatically applicable to the Australian military type, it may indicate a potential defect in the fleet; and
- c. The MTC holder for Australian type should ensure that such ADs are assessed for relevance and, where relevant, further treated in accordance with DASR 21.A.3A.

3.3.3 Recognition certificates are silent on the topic of ADs. Further detail is provided in the AMC and GM to DASR 21.A.3A.

### **3.4 Certificates of Airworthiness**

3.4.1 Recognition certificates may enable an applicant for a DASA CoA to use evidence originating from the recognised airworthiness system<sup>4</sup>. The types of evidence, the organisations suitable to provide it and the associated terms are described in the 'aircraft production' annex of the recognition certificate.

### **3.5 Military Permits to Fly**

3.5.1 Recognition certificates may enable an applicant for an MPTF to use relevant documents acceptable through recognition to support the application<sup>5</sup>. As the reasons for requiring an MPTF vary significantly, the recognition annexes generally do not identify which particular documents are acceptable.

3.5.2 Recognition annexes do not presently provide any guidance for assessing the suitability of recognised instruments and artefacts specifically for use as evidence in application for an MPTF.

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<sup>4</sup> DASR 21.A.174(b)

<sup>5</sup> DASR 21.A.709(b)

## 4 Recognition in Continuing Airworthiness

### 4.1 Introduction

- 4.1.1 This chapter describes recognition provisions of DASR M *Continuing Airworthiness Management* and DASR 145 *Requirements for Maintenance Organisations*. These provisions will be of interest to:
- Continuing Airworthiness Management Organisations (CAMOs)
  - organisations providing Continuing Airworthiness Management services
  - maintenance organisations
  - organisations setting up through-life support arrangements in the acquisition of a Defence aircraft platform
  - organisations managing the embodiment of a ‘major’ modification to a Defence aircraft platform.

### 4.2 Aircraft maintenance

#### 4.2.1 Provisions

- 4.2.1.1 CAMOs are responsible for ensuring that maintenance of aircraft is performed by an organisation approved by DASA or another organisation acceptable to DASA<sup>6</sup>. A maintenance organisation is acceptable to DASA if its services are accessed in accordance with the terms of a recognition certificate.
- 4.2.1.2 Recognition certificates may enable a CAMO to fulfil the aircraft Certificate of Release to Service requirement<sup>7</sup> using a maintenance organisation not approved by DASA<sup>8</sup>.

#### 4.2.2 Applicability

- 4.2.2.1 These provisions are applicable where DASA has recognised another airworthiness authority in the area of aircraft maintenance.

#### 4.2.3 Aircraft CRS

- 4.2.3.1 Recognised systems may include an artefact equivalent to an aircraft CRS; however, maintenance organisations may be prevented from issuing a native artefact against a Defence-registered aircraft by legal or policy constraints.

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<sup>6</sup> DASR M.A.201(g)

<sup>7</sup> DASR M.A.708(b)4

<sup>8</sup> DASR M.A.801

Instead, the CAMO should request an artefact that meets the requirements set out in DASR M.A.801.

#### 4.2.4 **Example – alternate aircraft CRS**

4.2.4.1 A Defence aircraft based on a civil type lands at a commercial airport in the United States after a lightning strike and needs to have a radio antenna replaced. A maintenance organisation located at the airport holds a Repair Station approval from the Federal Aviation Administration (FAA) under which it could carry out the required work on the base civil type.

4.2.4.2 The CAMO tasks the maintenance organisation to replace the antenna and release the aircraft to service, applying the scope, conditions and caveats of DASA's recognition of the FAA to ensure the suitability of its arrangements. The maintenance organisation carries out the work as it normally would under its FAA approval, using the same personnel and processes. However, the maintenance and release-to-service are not being done *in accordance with* the FAA approval as the work is outside the maintenance organisation's rating (scope) due to the aircraft being a military type and Defence-registered.

4.2.4.3 To overcome this, the CAMO requests a CRS in accordance with DASR M.A.801. The CRS identifies the maintenance organisation and its FAA approval number but does not state that the maintenance was carried out in accordance with the FAA approval or the Federal Aviation Regulations.

4.2.4.4 One of the standard caveats applicable to aircraft maintenance would require the CAMO to ensure that the FAA would apply its regular oversight to the work done. This caveat is unlikely to be met under the above scenario, making the CRS an *alternate* artefact. The acceptance of an alternate artefact is subject to DASA agreement<sup>9</sup>.

### 4.3 **Acceptance of components from production or maintenance**

#### 4.3.1 **Provisions**

4.3.1.1 Components released from production or maintenance must be accompanied by a CRS to be eligible for fitment<sup>10</sup>. Recognition provides two different means of meeting this requirement depending on the production or maintenance organisation being accessed and the airworthiness system it is working within; these are:

- Form 1 equivalent; and

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<sup>9</sup> AMC DASR M.A.201(g)

<sup>10</sup> DASR 21.A.307(a), DASR 145.A.42(a)

- alternate component CRS.

4.3.1.2 The acceptance of a component under a Form 1 equivalent or alternate component CRS may be subject to a suitability assessment of the artefacts but does not require a suitability assessment of the issuing organisation. However, new arrangements between Defence and an organisation carrying out component production or maintenance should involve an assessment of the suitability of the organisation to the greatest practicable extent. The 'aircraft production' and 'aircraft maintenance' annexes of the applicable recognition certificate will provide a useful basis for such an assessment.

#### 4.3.2 **Applicability**

4.3.2.1 These provisions are applicable to components released from production or maintenance where DASA has recognised another airworthiness authority in the area of component production or component maintenance, respectively.

#### 4.3.3 **Form 1 equivalent**

4.3.3.1 Where the recognised system includes an artefact that contains all of the same information as a DASR Form 1 and is intended to release a component to service, DASA may identify the artefact as a Form 1 equivalent. The artefact will be listed in the tables on the [DASA recognition web page](#) or in the relevant recognition certificate.

4.3.3.2 The recognition web page or certificate may state that some Form 1 equivalents can be consumed without applying any checks beyond those that should normally be carried out when consuming a DASR Form 1. An example of a Form 1 equivalent requiring no recognition-related suitability assessment is the United States Federal Aviation Administration Form 8130-3.

4.3.3.3 In other cases, simple additional checks are required prior to consumption of a Form 1 equivalent. Where required, these additional checks and how to make them will be described in the relevant recognition certificate annex. Examples are:

- Civil Aviation Safety Authority (CASA) Form 1. The consumer must check that a CASA Form 1 has been issued by an organisation approved under the *Civil Aviation Safety Regulation 1998*.
- European Aviation Safety Agency Form 1. The consumer must check that an EASA Form 1 has been issued under the approval of a recognised National Aviation Authority.

#### 4.3.4 **Alternate component CRS**

4.3.4.1 Some recognised systems do not include a component CRS or organisations may be prevented from issuing a native CRS. In such instances, DASA may agree that the component CRS requirement may be met by compiling several documents or requesting a custom artefact.

4.3.4.2 The compilation of documents or the custom artefact must contain all of the elements normally included on a DASR Form 1:

- a. the name and address of the issuing organisation;
- b. the name of the recognised airworthiness authority;
- c. evidence that the issuing organisation is working within the recognised authority's system (e.g. organisation approval reference);
- d. details of the component(s): description, part number, serial number(s) and/or batch number, as applicable;
- e. for used service-life-limited components, complete traceability to the component's service history;
- f. a clear indication of the current airworthiness status (serviceability) of the component at the date of issue;
- g. a release statement made by a suitably authorised person within the production or maintenance organisation;
- h. the name, signature (or electronic equivalent) and approval number (where applicable) of the person making the release statement;
- i. for components released from maintenance, a statement that the maintenance was carried out in accordance with the recognised authority's regulation/policy; and
- j. for components released from production, a statement that the component(s) was manufactured in conformity with approved data.

4.3.4.3 See paragraph 2.7.4 for information and conditions related to the acceptance of alternate artefacts.

#### 4.3.5 **Example 1 – Form 1 equivalent**

4.3.5.1 A maintenance organisation receives an EASA Form 1 releasing a fuel pump from maintenance. The Form 1 identifies the German NAA as the approving competent authority. DASA's certificate recognising the German NAA indicates recognition in the area of component maintenance.

4.3.5.2 The certificate's annex for 'acceptance of components' states that an EASA Form 1 is acceptable as a DASR Form 1 equivalent when issued by a maintenance organisation working within the German NAA system. The recognition conditions assist the consumer to ensure that this is the case; the only caveat requires any artefacts not in English to be suitably translated.

4.3.6 **Example 2 – alternate component CRS**

4.3.6.1 A CAMO is seeking to have maintenance of a hydraulic actuator carried out by the Original Equipment Manufacturer (OEM). The OEM holds a maintenance organisation approval from the Spanish MAA; however, the scope only covers those items in use by the Spanish military and does not include the item Defence requires. As the Defence hydraulic actuator is of the same basic type as those covered by the OEM's Spanish MAA approval, the OEM is able to carry out the work using the personnel and processes accepted through that approval.

4.3.6.2 The CAMO applies AMC M.A.201(g) and the terms of DASA's recognition of the Spanish MAA to establish that the OEM is a suitable provider of an alternate artefact meeting paragraph 4.3.4. DASA agrees to that arrangement, subject to the CAMO putting contractual arrangements in place with the OEM to ensure that:

- items for Defence are maintained using the same personnel and processes used to do similar work, and issue a similar release artefact, under the Spanish MAA approval; and
- the Spanish MAA approval remains valid throughout the provision of the service and the CAMO is notified of any relevant changes or audit findings.

4.3.7 **Example 3 – compiled alternate component CRS**

4.3.7.1 A CAMO receives a new main rotor gearbox assembly under an established Foreign Military Sales (FMS) arrangement. The assembly is produced in accordance with design data approved by the US Navy MAA. However, the artefact accompanying it is not listed as a DASR Form 1 equivalent on the recognition web page or the US Navy MAA recognition certificate.

4.3.7.2 Using the recognition certificate 'production' annex as a guide, the CAMO identifies that production of the gearbox assembly took place under the oversight of the Defence Contract Management Agency – an agent of the US Navy MAA. The CAMO compiles information from the received artefact and the details of the FMS case to propose to DASA an alternate CRS that meets paragraph 4.3.4 and takes into account the terms the US Navy MAA recognition.

## 4.4 Data for repairs and 'minor' modifications

### 4.4.1 Provisions

4.4.1.1 A CAMO may consume data for repairs and 'minor' modifications when the data is produced by an organisation accepted by DASA<sup>11</sup>. An organisation is accepted by DASA if its design products are being accessed in accordance with the terms of a recognition certificate and a suitable procedure<sup>12</sup>.

4.4.1.2 A flow chart describing this provision is presented in Figure 1 at the end of this section. For 'major' modifications, refer to section 3.2 above.

### 4.4.2 Applicability

4.4.2.1 This provision is applicable where DASA has recognised another airworthiness authority in the areas of design and certification.

### 4.4.3 Classification requirement

4.4.3.1 The purpose of classifying modifications and repairs as 'minor' or 'major' is twofold:

- to invoke appropriate holder obligations, such as ongoing monitoring by the MTC holder; and
- to ensure a commensurate level of Authority oversight.

4.4.3.2 Data originating from within some recognised airworthiness systems will already carry a classification equivalent to that applied in the DASR<sup>13</sup>. In such cases, the recognition certificate indicates that the existing classification is valid and does not state that further classification is required. In all other cases, the data must only be treated as 'minor' if it is classified as such in accordance with the DASR definition<sup>13</sup> by:

- a. the CAMO, through a procedure issued by DASA;
- b. a DASR MDO with the appropriate scope and privilege;
- c. the MTC holder<sup>14</sup>, where a DASR MDO is not available for the relevant aircraft type; or
- d. DASA.

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<sup>11</sup> DASR M.A.304(d)

<sup>12</sup> AMC DASR M.A.304(d)

<sup>13</sup> DASR 21.A.91

<sup>14</sup> In accordance with an arrangement agreed by DASA through the TCAE.

#### 4.4.4 **Classification by the CAMO**

4.4.4.1 Classification may be done by the CAMO in accordance with a procedure developed by the CAMO and issued by DASA. Such a procedure may only be applied to data that is already approved and acceptable through recognition. The procedure must:

- a. result in a 'minor' determination only where clearly supported by the characteristics of the data, i.e. the assessment is not complex or uncertain; and
- b. identify the specific personnel authorised to conduct or approve the classification, including their qualifications, knowledge and experience relevant to making such determinations.

4.4.4.2 This provision enables the CAMO to identify modifications and repairs that are 'minor'. All other designs should either be treated as 'major' or classified by another organisation listed at 4.4.3.2.

#### 4.4.5 **'Minor' modifications and 'minor' repairs**

4.4.5.1 Recognition certificates may enable the consumption of data for modifications in the form of approved 'minor' changes to type design or an equivalent instrument in the recognised system. 'Minor' modifications and 'minor' repairs may be consumed directly in accordance with the applicable scope, conditions and caveats; i.e. without engaging the Authority or a DASR MDO.

#### 4.4.6 **'Major' repairs**

4.4.6.1 Recognition certificates may enable the direct consumption of data for 'major' repairs under M.A.304(d) in accordance with a procedure agreed by DASA through the CAME.

4.4.6.2 Where direct consumption is not possible, data acceptable through recognition may be used to support an application for approval by DASA or an appropriately privileged DASR MDO in accordance with DASR 21 Subpart M *Repairs*. This will apply where:

- the recognition certificate does not enable direct consumption,
- a CAMO procedure for direct consumption is not in place, or
- a procedure is in place but has assessed the data as not suitable for direct consumption.

4.4.6.3 This provision was introduced in the September 2018 release of the DASR. At the time of publication of this AC, DASA is in the process of amending existing recognition certificates to include this provision where appropriate.

Further information is available from the relevant DASA Continuing Airworthiness desk officer.

#### 4.4.7 **'Major' repairs – CAMO procedure**

4.4.7.1 A CAMO procedure to assess 'major' repair data for direct consumption should ensure that:

- activities such as a the configuration, role and environment assessment are properly carried out, referring to DASA or a DASR MDO where appropriate; and
- where appropriate, repairs are submitted to DASA or a DASR MDO with the relevant privilege for approval.

4.4.7.2 The procedure applied by different CAMOs will vary according to the support arrangements in place for each platform, in particular:

- the design organisation(s) producing data;
- the airworthiness authority under which the data is approved;
- the type and location of repairs; and
- other relevant factors.

4.4.7.3 Further details will be provided in a forthcoming AC on repairs. In the interim, advice may be sought from the relevant DASA Continuing Airworthiness desk officer.

#### 4.4.8 **Technical information and instructions (e.g. Service Bulletins)**

4.4.8.1 The airworthiness instruments named in the recognition certificate annexes are generally the instruments issued by the recognised authority, or by a design organisation, to approve a modification or repair. Rather than these instruments, Defence organisations will often receive technical information or instructions describing the embodiment of the corresponding modification or repair, e.g. a Service Bulletin (SB).

4.4.8.2 In such cases, and where eligible, the technical information or instructions should be treated in accordance with the corresponding recognition scope, conditions and caveats as if it were the underlying airworthiness instrument. For example:

- A service bulletin describing the embodiment of a 'minor' modification should be treated like an approval of 'minor' change to type design or its equivalent in the recognised system.
- A technical instruction describing the embodiment of a 'major' repair should be treated like an approval of 'major' repair design or its equivalent in the recognised system.

4.4.8.3 **Eligibility.** To be eligible for treatment under this subclause, technical information or instructions describing the embodiment of a modification or repair must be:

- a. issued by a type of organisation acceptable through recognition to issue any type of airworthiness instrument, such as an approval of 'minor' change to type design; and
- b. issued in accordance with a procedure agreed by the recognised airworthiness authority, e.g. under the privilege of a design organisation approval.

4.4.8.4 **Classification.** The technical information or instructions may clearly indicate that the modification or repair is classified as 'minor' or 'major'. Where this is not the case, or where the relevant recognition annex identifies that instruments issued within that system require classification, the data should first be treated in accordance with paragraph 4.4.3 above.

4.4.8.5 **Consumption.** Because eligible technical information or instructions are issued with the agreement of the recognised authority, their consumption by the CAMO is not subject to acceptance by DASA; i.e. they are not an 'alternate' instrument.



**Figure 1 – Treatment of approved data for modifications and repairs accessed through recognition**

**4.4.9 Example 1 – ‘minor’ modification**

4.4.9.1 A CAMO receives a Service Bulletin describing the re-routing of a wiring loom. The SB was issued under a design organisation approval from the French MAA and bears a statement to that effect, including the organisation approval reference ‘FRA-21J-999-DGA’. The SB indicates that the classification of the modification is ‘minor’.

4.4.9.2 The SB is a piece of technical information rather than an airworthiness instrument, so it is not named in the certificate recognising the French MAA. However, that certificate does recognise some types of airworthiness instrument issued by an MDO under an FRA-21J approval. Therefore, a Defence CAMO may accept technical information or instructions issued by such organisations provided the information is issued in accordance with a

French MAA approval. The statement on the SB indicates that this is the case.

4.4.9.3 The CAMO directly consumes the SB, treating it in accordance with the recognition scope, conditions and caveats as if it were an approval of 'minor' change to type design.

4.4.10 **Example 2 – 'major' repair**

4.4.10.1 A CAMO receives a Repair Approval issued by the US Navy MAA or its delegated personnel. The CAMO applies a procedure issued by DASA to identify whether the repair is 'minor'; however, the data does not support a 'minor' classification.

4.4.10.2 In this instance the CAMO has a procedure, agreed by DASA through the CAME, to consume 'major' repairs. In applying the procedure, the CAMO ensures that the characteristics of the data do not trigger involvement by DASA or an MDO. The CAMO directly consumes the Repair Approval in accordance with the procedure and the recognition scope, conditions and caveats.

## Annex A: Example recognition certificate



**Australian Government**  
**Department of Defence**

**DEFENCE AVIATION SAFETY AUTHORITY**

# AIRWORTHINESS RECOGNITION

The Authority hereby recognises the

**[NATIONAL MILITARY AIRWORTHINESS AUTHORITY]**

being the National Military Airworthiness Authority (NMAA) of [COUNTRY], as a competent Airworthiness Authority that applies appropriate safety oversight to

**[Design, Certification, Maintenance and Production]**

TERMS

1. This Recognition is limited by the scope, conditions and caveats set out in:
  - i. [Annex A for minor design approvals]
  - ii. [Annex B for certification and major design approvals]
  - iii. [Annex C for maintenance of whole aircraft]
  - iv. [Annex D for acceptance of components from maintenance or production]
2. This Recognition shall remain valid for a period of four years unless superseded, suspended or revoked.

**For and on behalf of the Defence Aviation Safety Authority**

Certificate number: [XXX]  
Revision number: [X]  
Date of issue: [XX/XX/XXXX]

**A. Citizen**  
DG DASA

Defending Australia and its National Interests  
www.defence.gov.au



Name of recognised authority.

Areas in which the authority is recognised.

List of annexes defining the scope, conditions and caveats of the recognition.

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21 September 2018

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