

Report on S A CAA Advocacy Involvement of the Aero Club

The information in this report is listed with the most recent meeting first, followed in reverse order by all prior meetings. Information summarised here relates to agenda items of the meetings that were applicable to the interests of Aero Club only. If you require more information about the content of a meeting, please let me know. Thank you, Walter Doubell walterd@lantic.net

<u>Date</u>	<u>Committee</u>	<u>Agenda items requiring AeCSA input</u>	<u>AeCSA Concerns</u>	<u>Action taken by AeCSA</u>	<u>Outcome / Decision of meeting</u>
15 Dec 2022	Special ASO Sub-Comm	Proposed Part 91-Special Air Events	See 9 December	None	Proposal withdrawn. Will be discussed in detail at a future workgroup meeting
14 Dec 2022	Special AI Sub-Comm	Proposed amendment to Part 139. Regulation of approved aerodromes	None. The wording has been changed as per requests in previous meetings	None	Amendment to Part 139 approved, proposal sent for promulgation
9 Dec 2022	CARCom	<p>4.7(a) - Amendment to Fees</p> <p>5.1.10 - Amendment to Part 187.03.1 proposal opening of a trust account by any entity accepting funds on behalf of CAA</p> <p>5.1.42 to 5.1.68(a) Amendment re 5-Year audit process of AROs. Parts 96.04, 141.01, 145.02, 148.02, 149.02</p> <p>5.2.4 – Insertion of new Part 91.06.35 and Part 91.06.36</p>	<p>No consultation with industry, no substantiation for amount of increase</p> <p>Costly and unnecessary for smaller G A entities</p> <p>Extensive reasons for rejection given by Yolande Combrinck. The cost and additional workload on AROs will create a burden</p> <p>Objections raised by RAFSA and CAASA.</p>	Support for the objections that were raised	<p>All 3 these agenda items were withdrawn by the proposers and will be revised and tabled at future meetings</p> <p>The matter was withdrawn and will be discussed at Special Workgroup meeting. All AROs will be invited.</p>

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		Special Air Event and Display Authorisation defined and CAA's oversight over SAE stated	AeCSA also objected due to no known consultation with industry		
5 Dec 2022	Special ASO Work Group See 24 Nov below	Proposed insertion of Part 106 into CARS See 24 Nov below	See 24 Nov below	AeCSA stated that the reasons for the CAA opposing the proposal are vague and not specific. Support that proposal for new Part 106 be accepted	The opposition by CAA to the proposal not accepted. Kev Storie explained in detail the need for a separate part. No final decisions reached – industry agreed to go and look at the part 62 proposal with Amina and Pierre. Industry position is it must remain a new part 106.
24 Nov 2022	Special ASO Sub-Comm	Item 4.4(b) Proposed insertion of Part 106 into CARS	Proposal by SAHPA to insert this as a new Part to CAA Regs. No objection by AeCSA	Support that proposal for new Part 106 be accepted	CAA opposed the proposal stating that it can be accommodated in existing Parts. No agreement reached and after debate, the proposal was not approved by the ASO Subcommittee but sent to a workgroup (WG) for further deliberations. The WG needs to be chaired by a person not involved till now. All accepted that Gawie Bestbier chair the WG.
18 Nov 2022	Special Fees & General Sub-com	See 10 Nov below	See 10 Nov below	See 10 Nov below	Wording of proposal has been changed; CAA advised by email on 2 Dec. 22 that another meeting will be scheduled to

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					discuss the amended wording of the proposal
10 Nov 2022	Special Fees & General Sub-com	See 16 Sept meeting Insertion to CARS at 187.03.01 Opening of trust banking account by entities that receive finds on behalf of the SACAA	Unnecessary burden and cost to DTOs, APs and other who accept money for payment to CAA. Not needed because funds are not kept but paid over immediately to CAA	Support of SAHPA, SAGPA objections to the proposal.	Referred to work group to make changes to wording
7 Nov 2022	CARCom	Proposed insertion of Part 106 into CARS	Process followed by CAA in their handling of and approach to the proposals of SAHPA	Support of SAHPA in request to have a workgroup that will debate the proposal in detail. Also, that there should not be delays by CAA and specific coordination to ensure an outcome.	Matter referred to ASO sub-committee for deliberation and then to report back to CARCom.
27 Oct 2022	ASO Sub Comm	Amendments to Part 141 regarding flipping by ATOs	Although flipping by an ATO is against existing regulations, CAA is offering no alternative in Part 141	Support of proposals by AROs - SAHPA, SAGPA and PASA	CAA proposer agreed to withdraw proposed amendments to allow AROs to request an exemption from the Commissioner. AROs will also suggest amendments to Part 96 that will ease requirements for licencing of AROs as commercial operators
26 Oct 2022	Special Aviation Infra-structure	None Part 139 Aerodrome surveying Part 174 Met Info definitions	None	None	Meeting attended as observer

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25 Oct 2022	Special ASO Sub-Comm	Amendments to Part 67 Medical protocols See meeting 21 Oct 22	Vague definitions of BMI and lung function protocols	Support for altered wording	Definitions altered and explained by CAA medical. Proposals sent for comment
21 Oct 2022	CARCom	Amendments to Part 67 Medical protocols	Vague definitions of BMI and lung function protocols	Support to refer for re-wording	Withdrawn referred to ASO sub com
4 Oct 2022	ASO Sub-committee	5-year audit of AROs proposal. Amendment of sub-part 149.02.7 and sub-part 149.02.9 of S A CATS 149	See 19 and 22 Aug comments	See 19 and 22 Aug comments	Proposals to be published for public comments and will then return to CARCom. CAA committed to including all relevant industry participants in compiling checklist for yearly compliance audit
3 Oct 2022	AI Sub-Comm See meeting of 13/07 and 12/09	Amendment of Part 139 sub-part 5, Regarding use of unlicensed aerodromes by charter operations	CAA propose that the aerodromes be “authorised” Discussion if “ accepted” or “accredited” could be used	Opposed the use of “authorised,” this will imply regulation and oversight by the CAA placing an onerous burden on the owners of small air strips and aerodromes.	The word “approved” will be used. The new wording of the proposed amendments to Part 139 will be circulated to members. Will then move to a workgroup for discussion.
29 Sept 2022	Fees and General Sub-Committee	1. Insertion of CAR 187.03.01 Opening of trust banking account by entities that receive finds on behalf of the SACAA 2. Amendment to 187.01.35 fess change	The effect on smaller ATOs, AMOs, AROs and other sections that possibly receive CAA fees for further payment to the CAA.	Same as Special CARCom of 16 Sept	1 Referred for comment to legal dept. 2 Withdrawn by proposer
26 Sept 2022	ASO sub-committee meeting	Amendments to sub-part 11 and Part 12.	None	None	Concerns raised by some members. Written submissions to be made to CAA

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		Re officials who do accidents and incident investigation			
16 Sept 2022	Special CARCom	Insertion to CARS at 187.03.01 Opening of trust banking account by entities that receive finds on behalf of the SACAA	The effect on smaller ATOs, AMOs, AROs and other sections that possibly receive CAA fees for further payment to the CAA.	More clarity and specific information needed before any decision can be made	Referred to Fees and General sub-committee
12 Sept 2022	AI sub-committee	Amendment of Part 139 sub-part 5, Regarding use of unlicensed aerodromes by charter operations	CAA propose that the aerodromes be “authorised” Discussion if “ accepted” or “accredited” could be used	Opposed the use of “authorised”, this will imply regulation and oversight by the CAA placing an onerous burden on the owners of small air strips and aerodromes.	Matter referred to the sub-committee for deliberation
24 Aug 2022	ASO sub-committee	Amendment of CATS 66.01.9. Proposal by Solenta Air for less stringent restrictions on the certification of non-S A resident AMEs doing work on S A aircraft outside S A.	May affect some APs	None	Department of Transport objected. Meeting resolved that the DoT would rewrite its objection and submit to the meeting
22 Aug 2022	Workgroup on 5-year audit proposals	5-year audit of AROs proposal. Amendment of sub-part 149.02.7 and sub-part 149.02.9 of S A CATS 149	See comments at 19 Aug meeting	Already done, see comments at 19 Aug meeting	Agreed that the proposed additions do not serve the AROs. Most proposed wording deleted. Referred to ASO sub-com to finalise and recommendation to CARCom.
19 Aug 2022	CARCom	5-year audit of AROs proposal. Amendment of sub-part 149.02.7	Proposal that changes of accountable manager at an ARO will place unnecessary	Objections sent to ASO committee secretariat. Original objection sent on 1 July 22 and	Due to objections received, matter is referred to workgroup to be chaired by Amina Moola

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		and sub-part 149.02.9 of S A CATS 149	burden on AROs. AeCSA sections and AROs do not function as commercial entities	further suggestions sent on 4 Aug 22.	
14 July 2022	Industry meeting after referral by ASO sub Comm on 14 June 22	Amendments to Part 106. CATS 106.05.1	Restrictive requirements in the proposed amendments to 106.05, 106.07 ad 106.11	Support of SAHPA in their proposals	Agreement to certain proposals. Other proposal rejected and new wording will be sent to Mary Stephens.
8 July 2022	ASO Sub Comm	Sub-part 19 of Part 61 of SACARS – test pilot rating	A few anomalies in CAA proposal to amend sub-part 19 of Part 61. Rob J letter to CAA dated 8 Jun22	AeCSA supports CAASA, Sling Factory, Rotary air force and Kitplanes opposition to proposed amendments	Proposals withdrawn. Referred to work group
15 June 2022	CARCom	First meeting. Attended as an observer. Marthinus still representing the AeCSA			