



COMMERCIAL AVIATION ASSOCIATION OF SOUTHERN AFRICA NPC

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CAASA STATEMENT ON AIC 18.19 UNNOTIFIED WITHDRAWAL BY THE REGULATOR

On the 2 November 2023 with no notification to the industry via an AIC or at an industry liaison forum or by any official process, the regulator withdrew AIC 18.19.(in place to cater for old aircraft with low hours) utilising various acceptable safety methods at AMO's to ensure safety and continued airworthiness.

Due to US manufacturers' concern of litigation, the life span before overhaul was recommended by some OEM's to be no longer than 12 years.

What makes a SAFETY mockery, one can fly their entire family and friends in the same aircraft if it is deemed not commercial based on the provisions currently in place. If payment is received it is unsafe – but if not, is considered safe. It is therefore no longer safety but only being looked at from a litigation perspective and revenue generation by the OEMs and the regulators.

The cost to overhaul let alone cost of the time make bookings with AMOs, await an appointment, and ensure the relevant spares which could be anything from 3 months to a year, the latter being closer to the reality. The withdrawal forces immediate compliance without which there is no insurance. The effect only directly affects commercial operators and training schools but will ultimately negatively affect the entire industry in the long-term with many of these perfectly serviceable aircraft being sold out of the country.

The regulator knowingly and even after repeated request by industry to allow the regulated AIC to remain in place, giving industry suitable time to undertake compliance for cost around the 1-million-rand mark, has not reinstated the AIC even though regulation points to it.

The regulator has also not considered having many aircraft on the ground as urgent, kicking the can down the road for two weeks with a promise of correction not realised. The regulator has confused industry with an irregular Notam with differing dates and has not followed due process of notification or internal and external change management.

At present there are training schools that have not operated for the past few weeks and have a very real possibility of closing for good with the loss of jobs, and students that cannot complete training that effectively uses these very types of aircraft. Additionally, if these schools are to remain open with additional costs or loss of aircraft from the fleet, will increase the costs of training which will effect transformation additionally.

Affiliated Associations: AAA-SA, AATOSA, AMOSA, ASAAT, ANSO, HASA, CUAASA and AADO

Directors: J. Nell (President); M.D. Clark, R.F. Botha, M. Buttle, J.A. Earle, R.C.H. Garbett, J Fourie, G. Kiggen, S. Ledlie,

R. Rammopo, S Ramosa

In discussion with the authority representatives at the CAL meeting, they additionally stated that SACAA could not understand the glaring difference between their new promulgated regulations and the AIC 18.19. Industry at the CAL meeting was asked to explain this. This is worrying to industry.

The regulator, based upon statements made at the meetings, has no idea of the quantum of how many aircraft it would affect despite being the custodians of this information.

The bottom line is that the regulator with poor processes and feeble communication on this matter prior to withdrawal, with no idea of the magnitude or the consequential effect, has been very slow to address the matter and is trying to force individual exemption application that cannot cope with at this time of year, and additionally attempt to make further revenue out of the matter by attempting to individualise this matter to Case by Case exemption basis.

CAASA representing many of these affected operators and schools seeks to achieve legal relief for the industry funded by the affected operators with the aim to achieve sufficient time (at least 180 days) to comply while the giving the regulator time to adequately consult with industry experts to develop an AMOC or change regulation to correctly manage the situation with a correct fit for the South African industry and older fleet.

Contrary to the Regulator's knee jerk reaction to only one accident (the cause of which has little we believe, to do with the 12-year overhaul guidance from some OEM's) can show no effective data/empirical evidence from South Africa to underpin this withdrawal especially an exemplary safety record over the past 17 years of these older aircraft maintained as they are required in AIC 18.19.

This unfortunate position taken by the regulator comes on the back of the debilitating COVID epidemic from which industry still has not recovered and which depleted all cash reserves.

CAASA with other affected organisations hope that the regulator and specifically the director will urgently rethink and allow a suitable time to get industry to comply and should regulator not make a favourable implementation date for which we are still hopeful. CAASA intends to seek relief to the fullest extent of the law as per legal councils' guidance.

End of statement .

Your sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Storie', enclosed within a large, loopy circular flourish.

KEV STORIE

CAASA

CHIEF EXECUTIVE OFFICER