

Key Questions from the feedback form reproduced here.

11. Do you support the proposed changes made to the qualification/s?

12. Do you support the proposed changes made to the unit/s of competency?

13. Do you support the proposed changes made to the skill set/s?

14. Do you support the proposed changes made to the Companion Volume Implementation Guide (CVIG)?

15. If you answered 'No' to any of the above, please provide the following information:

- The training product you do not support (code and title)
- The reasons you do not support this product
- The changes you believe should be made

INDUSTRY GUIDANCE DOCUMENT

MISA Public Consultation – MEA: Aviation Maintenance Skills Alignment

Why this consultation matters

MISA has now released the draft public consultation package for proposed changes to the MEA Training Package as part of the broader alignment work between vocational training pathways and CASA Part 66 licensing requirements.

These proposed changes will directly influence how future aircraft maintenance engineers are trained, assessed and progressed toward licensing outcomes across Australia.

This includes impacts to:

- Apprentice training pathways.
- Pathways to Certificate IV and Diploma completion.
- CASA modular licensing pathways.
- Employer ability to train apprentices within their own maintenance environments.
- Practical workplace evidence requirements.
- Workforce accessibility in General Aviation.
- Future pathways to B1/B2 licence outcomes.
- Long-term workforce capability across General Aviation, regional aviation, defence and commercial sectors.

While parts of the proposed changes represent genuine improvement, particularly improved mapping, greater transparency and better guidance material, the consultation also presents an important opportunity for industry to highlight structural issues that may continue to create barriers for apprentices and employers.

If these structural issues remain unresolved, apprentices may continue to face unnecessary training requirements on systems that do not exist in their workplace, employers may continue to struggle to support practical evidence requirements, and the intended flexibility of modular licensing may not be fully realised.

Once these training products are endorsed and implemented, structural changes to qualifications and units may take significant time, funding and industry coordination to revisit.

This consultation may be one of the most important opportunities industry has for some time to help shape training pathways that are practical, achievable and aligned with operational reality.

Background – our position

Aviation Australia supports the original objective of the project to provide better alignment between the MEA Training Package and CASA Part 66 licensing pathways.

We support:

- Better clarity between MEA units and Part 66 modules.
- Improved guidance materials.
- Better licensing pathways.
- Progressive modular licensing outcomes.
- Skillsets that support progression over time.

Our concern

While the consultation package delivers improvements in several areas, we believe important structural issues remain unresolved.

Improvements include:

- Improved mapping between MEA qualifications and CASA Part 66 modules.
- Greater transparency in licensing alignment.
- Improved guidance material through the Companion Volume Implementation Guide (CVIG).
- New modular licensing skillsets.
- Targeted restructuring of advanced troubleshooting units.

These are positive improvements.

However, the broader structural issue remains largely unresolved.

While five new units have been created by splitting the existing advanced troubleshooting units (MEA235 and MEA323), the consultation does not address many other broad units that continue to bundle multiple aircraft systems together and create practical barriers for General Aviation employers and apprentices.

The key structural issue industry should understand

While the current review improves mapping between the MEA Training Package and CASA Part 66 knowledge modules, it does not sufficiently address one of the biggest structural barriers currently faced by industry.

A significant number of existing MEA's bundle multiple aircraft systems into single units of competency, while the broader qualification packaging rules and prerequisite requirements often assume exposure to aircraft systems that simply do not exist in many General Aviation (GA) workplaces.

This creates a very real problem for a significant portion of the GA sector.

Many apprentices are unable to complete the Certificate IV or Diploma pathways not because of a lack of capability, motivation or employment opportunity, but because the current training package assumes exposure to aircraft systems commonly found in larger or complex aircraft.

For many apprentices working on light fixed and rotary aircraft in smaller GA operations those systems may simply not exist within their workplace environment.

In this context, the qualifications can become a barrier rather than an enabler.

Why this matters for modular licensing

The original intent of CASA's modular licensing framework was to create a more flexible and achievable pathway to licensing, particularly for Aircraft Maintenance Engineers (AME) working in General Aviation and smaller maintenance environments.

From a practical training perspective, this means apprentices should be able to achieve an initial licence outcome on aircraft where systems are limited in complexity and scope.

Requiring candidates to demonstrate competence on systems that do not exist on the aircraft they maintain undermines the intent of modular licensing and creates unnecessary barriers to entry.

Current examples of embedded barriers

A common challenge experienced by apprentices is the requirement to gain practical experience on systems embedded within mandatory units where those systems are not fitted to their aircraft.

Examples include:

- Pneumatic systems.
- Air conditioning systems.
- Cabin pressurisation systems.
- Powered hydraulic systems.
- Retractable landing gear systems.
- Nose wheel steering systems.

- Complex flight control systems.
- Complex AC/DC power, regulation and distribution systems.

These systems are often embedded within broader units of competency that combine multiple ATA systems.

This means apprentices may complete training on the systems relevant to their employer but still be unable to complete the full unit because they cannot access unrelated systems.

The result

This can lead to:

- Delayed apprenticeship completion.
- Delayed licensing outcomes.
- Additional cost burden on employers.
- Apprentices leaving smaller operators to seek experience elsewhere.
- Apprentices leaving the industry.
- Reduced willingness for GA employers to take on apprentices.

Where workplace systems do not exist, employers may be forced to rely on:

- Simulation.
- Third-party practical training.
- Apprentice movement between employers.

This increases cost and complexity.

Ultimately, this risks creating the opposite outcome to what modular licensing was originally designed to achieve.

Skillsets

MISA has introduced six new skillsets designed to support modular licensing outcomes, including initial licence pathways and exclusion removal pathways.

Industry may wish to support these changes while also noting that:

- Skillsets should support progression.
- Skillsets should support exclusion removal.
- Skillsets should support licence expansion over time.

However:

- Skillsets alone do not resolve underlying structural issues where apprentices cannot complete the base qualification or unit requirements in the first place.
- If the underlying units remain too broad, skillsets may improve administrative pathways while leaving practical barriers unresolved.

Multiple stakeholders are raising similar concerns

These concerns are not unique to Aviation Australia.

Other training providers and industry stakeholders have raised similar concerns regarding:

- Units being too broad.
- Mapping occurring before structural reform.
- Difficulty achieving units in GA environments.
- Poor alignment with modular exclusions.

Our recommendation to industry

When completing the public consultation, we encourage industry stakeholders to take a balanced approach.

There are elements of the proposed changes that represent genuine improvement and should be acknowledged.

Areas industry may wish to support

- Improved alignment between MEA units and CASA Part 66 knowledge modules.
- Greater transparency around how qualifications align to licensing outcomes.
- Improved guidance materials through the Companion Volume Implementation Guide (CVIG).
- Skillsets that support progressive removal of exclusions and licence expansion over time.
- Greater clarity for existing Certificate IV and Diploma holders seeking future licensing pathways.

Areas industry should strongly consider raising concerns on

While the above improvements are positive, industry should carefully consider whether the proposed changes adequately address the structural barriers that currently exist within the training package.

Broad units that combine multiple aircraft systems

Many units continue to bundle multiple ATA systems into a single unit of competency, creating unnecessary evidence requirements for systems that may not exist in many workplaces.

Practical achievability in real workplaces

Industry should ask:

Can apprentices realistically complete these units within our business using the aircraft and systems we actually maintain?

If the answer is no, that should be raised.

Does this make licensing pathways more achievable in real workplaces?

Or does it simply improve administrative alignment of the qualifications without removing practical barriers?

Why your feedback matters

The outcomes of this consultation will help shape aviation maintenance training pathways for years to come.

Once these training products are endorsed and implemented, future structural changes to qualifications and units may take significant time, funding and industry coordination to revisit.

Without strong and practical industry feedback during this consultation:

- Existing structural barriers may remain embedded within the training package.
- Apprentices may continue facing unnecessary delays in completing qualifications and achieving licence outcomes.
- Employers may continue struggling to provide access to required workplace evidence.
- Smaller General Aviation and regional operators may become less willing or able to employ apprentices.
- Training providers may be forced to rely more heavily on simulation or alternative arrangements to fill workplace gaps.
- The intended flexibility of CASA's modular licensing framework may not be fully realised.

Ultimately, the questions for industry are simple:

Can an apprentice realistically complete this qualification pathway using the aircraft and systems maintained within our business?

If the answer is no, that feedback should be raised through consultation.

Does the proposed training package make it easier for apprentices to achieve meaningful outcomes in the workplace?

Or does it simply make the current system easier to interpret while leaving the underlying structural barriers in place?

This consultation represents one of the most important opportunities industry may have for some time to influence these pathways and ensure they are practical, achievable and aligned with operational reality.

Suggested responses to consultation questions

The following guidance is intended to help industry stakeholders respond to the formal consultation questions. These are not prescriptive responses, but examples of the types of issues stakeholders may wish to raise based on their workplace.

Question 11

Do you support the proposed changes made to the qualification/s?

Suggested response:

Partially support

Why:

Industry may wish to acknowledge that improved alignment between qualifications and CASA licensing pathways is positive although most qualification changes are administrative in nature and improve clarity.

However, they do not materially address:

- Qualification packaging barriers.
- Prerequisite barriers.
- Practical achievability issues for smaller operators.
- Access issues for apprentices working on non-complex aircraft.

Example feedback:

We support improved alignment between qualifications and CASA licensing pathways. However, current qualification structures may still create barriers for apprentices working on non-complex aircraft where access to certain aircraft systems is not available. Qualification pathways should better reflect operational differences across General Aviation and larger commercial environments.

Question 12

Do you support the proposed changes made to the unit/s of competency?

Suggested response:

Partially support / No (where applicable)

This is likely where many industry stakeholders may wish to focus their feedback.

Why:

Many units continue to bundle multiple aircraft systems into single units.

This creates practical barriers where employers do not maintain aircraft with those systems.

Example feedback:

Only five new units have been structurally split. While we support improved mapping of units to CASA Part 66 modules, concerns remain that many units remain too broad and continue to combine multiple aircraft systems into single competency outcomes. This creates barriers for those working in General Aviation and smaller maintenance environments where those systems do not exist.

Industry may wish to reference specific units such as:

- MEA398
- MEA309
- MEA310
- MEA318
- MEA320
- MEA323
- MEA303
- MEA317
- MEA293
- MEA226

(Refer to Appendix A for suggested unit specific responses.)

Question 13

Do you support the proposed changes made to the skill set/s?

Suggested response:

Generally support

Why:

Skillsets can be beneficial where they support:

- Progressive removal of exclusions.
- Incremental licence progression.
- Clearer pathways for existing workers.

Suggested caveat:

Industry may wish to note that skillsets should not be used as a substitute for fixing structural issues within the base qualifications and units.

Example feedback:

We support skillsets that allow progressive licence expansion and removal of exclusions over time. However, skillsets alone will not resolve structural issues where apprentices cannot achieve the underlying units or qualifications.

Question 14

Do you support the proposed changes made to the Companion Volume Implementation Guide (CVIG)?

Suggested response:

Generally support

Why:

Improved guidance is helpful for:

- Employers.
- Apprentices.
- RTOs and MTO's.
- Regulators.

Particularly where it improves understanding of:

- Qualification pathways.
- Modular Licensing pathways.
- Licensing outcomes.

Suggested caveat:

Guidance material alone will not resolve structural issues within units.

Example feedback:

We support improved guidance material and clearer implementation advice. However, improved guidance should complement structural reform rather than replace it.

Question 15

If you answered “No” or “Partially Support”

You will be asked to provide:

- The training product code and title.
- Why you do not support it.
- What changes should be made.

Example response format

Training Product:

MEA398 – Remove and install aircraft hydro-mechanical and landing gear system components.

Reason:

This unit combines fuel, hydraulic and landing gear systems into one unit. Many General Aviation operators do not maintain aircraft with powered hydraulics or retractable landing gear systems as an example.

Suggested change:

Split the unit into separate ATA aligned units:

- Fuel systems.
- Hydraulic systems.
- Landing gear systems.

Appendix A for suggested unit specific responses

The below examples are provided to assist industry stakeholders in responding to Question 15 of the consultation.

Training Product	Current Issue	Why this creates problems	Suggested Change/s
MEA398 – Remove and install aircraft hydro-mechanical and landing gear system components	Combines ATA28 (Fuel), ATA 29 (Hydraulic Power), ATA 32 (Landing Gear) into one unit.	Many GA operators maintain aircraft with fuel systems but no powered hydraulics or retractable landing gear. Apprentices may complete relevant work but still fail to complete the unit.	Split into separate units aligned to ATA 28, ATA 29 and ATA 32. Allows: <ul style="list-style-type: none"> • E13 Excluding hydraulics — ATA29 • E42 Excluding landing gear retraction systems Remove as prerequisite for MEA317 as is a barrier for those Cert IV Structures pathway.
MEA309 – Inspect, test and troubleshoot aircraft hydro-mechanical and landing gear systems and components	Combines ATA28 (Fuel), ATA 29 (Hydraulic Power), ATA 32 (Landing Gear) into one unit.	Requires exposure to systems not fitted to many GA aircraft. Limits practical use of modular exclusions.	Split into separate units aligned to ATA 28, ATA 29 and ATA 32. Allows: <ul style="list-style-type: none"> • E13 Excluding hydraulics — ATA29 • E42 Excluding landing gear retraction systems
MEA310 – Inspect, test and troubleshoot aircraft	Combines Pneumatic (ATA36)	Many aircraft do not have complex pneumatic systems.	Ideally would be best if it was split into Pneumatics (ATA36) and Air Cycle Aircon (ATA21) Allows:

Training Product	Current Issue	Why this creates problems	Suggested Change/s
<p>pneumatic systems and components</p>	<p>Airconditioning (Aircycle) (ATA21)</p>		<ul style="list-style-type: none"> • E15 Excluding air-conditioning aspects of ATA21 • E16 Excluding pressurisation aspects of ATA21
<p>MEA303 – Remove and install aircraft pneumatic system components</p>	<p>Combines Pneumatics (ATA36) and Air Cycle Airconditioning (ATA21)</p>	<p>Many aircraft do not have air cycle air conditioning systems.</p> <p>Additional it presents a pathway issue:</p> <p>It is a prerequisite for MEA317. (MEASTR0001 (MEA401) and MEASTR0005 (MEA410) or Core Units are better suited) Sometimes must be included when building Cert IV Structures pathway (and to a much lesser extent Cert IV Mech) pathways as MEA317 is required to make up the number of Electives.</p>	<p>Ideally would be best if it was split into Pneumatics (ATA36) and Air Cycle Aircon (ATA21)</p> <p>Allows:</p> <ul style="list-style-type: none"> • E15 Excluding air-conditioning aspects of ATA21 • E16 Excluding pressurisation aspects of ATA21 <p>Remove as prerequisite for MEA328.</p>

Training Product	Current Issue	Why this creates problems	Suggested Change/s
MEA317 – Remove and install pressurised aircraft structural and non-structural components		The prerequisites MEA303 and MEA398 do not appear appropriate in the context of the Structures pathway. The originally proposed prerequisites on the Mechatronics pathway were effectively limited to MEASTR0001 (MEA401) and MEASTR0005 (MEA410). MEA303 and MEA398 as prerequisites creates unnecessary burden for Certificate IV Structures candidates and does not appear logically aligned to the intended Structures pathway outcomes.	MEA303 needs to be removed as a prerequisite. MEA398 needs to be removed as a prerequisite as is a barrier those on Certificate IV structures pathway.
MEA318 – Inspect aircraft hydro-mechanical, mechanical, gaseous	Combines Fuel (ATA28), Hydraulics (ATA29), Landing gear (ATA32), Pneumatics (ATA36), Air	Requires exposure to systems not fitted to many GA aircraft. Limits practical use of modular exclusions.	Split into: <ul style="list-style-type: none"> • Fuel (ATA28) • Hydraulics (ATA29) • Landing gear (ATA32)

Training Product	Current Issue	Why this creates problems	Suggested Change/s
and landing gear systems and components	Cycle Aircon (ATA 21) into one unit.		<ul style="list-style-type: none"> • Pneumatics (ATA36) • Air Cycle Aircon (ATA 21) <p>Allows:</p> <ul style="list-style-type: none"> • E13 Excluding hydraulics — ATA29 • E42 Excluding landing gear retraction systems
MEA320 – Test and troubleshoot aircraft hydro-mechanical, gaseous and landing gear systems and components	Combines Fuel (ATA28), Hydraulics (ATA29), Landing gear (ATA32), Pneumatics (ATA36), Air Cycle Aircon (ATA 21) into one unit.	Requires access to aircraft systems many operators do not maintain.	<p>Split into:</p> <ul style="list-style-type: none"> • Fuel (ATA28) Hydraulics (ATA29) • Landing gear (ATA32) • Pneumatics (ATA36) • Air Cycle Aircon (ATA 21)
MEA323 – Perform advanced troubleshooting in aircraft mechanical maintenance	<p>Airframe systems:</p> <ul style="list-style-type: none"> • Hydromechanical • Pneumatic and Aircon (May be omitted based on Enterprise) - will go hand in hand with E14/15/16 exclusions • Flight controls <p>Engine Systems:</p>		<p>Should really have dedicated advanced troubleshooting Units to align with each relevant exclusion that may find its way onto a modular licence, but here is a workable short-term solution.</p> <p>Airframe systems:</p> <ul style="list-style-type: none"> • Hydromechanical • Pneumatic and Aircon (May be omitted based on Enterprise) - will go hand in hand with E14/15/16 exclusions

Training Product	Current Issue	Why this creates problems	Suggested Change/s
	<ul style="list-style-type: none"> Fuel and Engine Control systems Engine Air Systems (May be omitted for Piston Engines) Accessories 		<ul style="list-style-type: none"> Flight controls Engine Systems: <ul style="list-style-type: none"> Fuel and Engine Control systems Engine Air Systems (May be omitted for Piston Engines) Accessories
MEA328 – Maintain and/or repair aircraft mechanical components or parts	MEA328 is currently required for both Engine and Airframe modular licence pathways.	Can create unnecessary crossover requirements between airframe and engine pathways.	Split airframe and engine to support modular licence Change prerequisites to Common Core. Current prerequisites are Airframe only Units (MEA303 and MEA398)
MEA203 – Remove and install aircraft electrical and electronic system components	Broad grouping of electrical systems	Many operators do not maintain all electrical systems contained within the unit.	Split into smaller electrical pathways. DC Systems, AC Systems for example.
MEA293 – Remove and install aircraft electronic system components	Combines electrical, radio and instrument systems into one unit.	Does not support the modular licence pathways of electrical, instrument and radio.	Split into electrical, instrument and radio systems.

Training Product	Current Issue	Why this creates problems	Suggested Change/s
MEA226 – Inspect aircraft electronic systems and components	Combines electrical, radio and instrument systems into one unit.	Does not support the modular licence pathways of electrical, instrument and radio.	Split into electrical, instrument and radio systems.
MEA208 – Remove and install pressurisation control system components	Combines electrical and instrument systems into one unit	Does not support modular licence pathways.	Split into electrical and instrument systems. Allows: <ul style="list-style-type: none"> • E31 Excluding pressurisation systems (against B2 Instrument Systems) • E16 Excluding pressurisation aspects of ATA21 (B1.1/B1.2)
MEA219 – Inspect, test and troubleshoot aircraft pressurisation control systems and components	Requires practical exposure many operators cannot provide	Does not support modular licence pathways.	Split into electrical and instrument systems. Allows: <ul style="list-style-type: none"> • E31 Excluding pressurisation systems (against B2 Instrument Systems) • E16 Excluding pressurisation aspects of ATA21 (B1.1/B1.2)