



MEDIA RELEASE NO. 15.

DATE 26 NOVEMBER 2025

Issued by the **AIC 18. 19 Task Team** under the collective auspices of the **Commercial Aviation Association of South Africa (CAASA)**, the **Aeroclub of South Africa**, the **Aviation Watch Action Committee**, the **Aviation Action Group** and Concerned Aircraft Owners, Pilots, Engineers and Operators.

AVIATION RESPONSE AND ACTIONS

1. Industry Meeting

The participating industry met to consider all possible options available after the Task Team was charged with developing a way forward. Factually, the court case, has resulted in the regulator undertaking a rethink and proposing amended CARS and CATS for the next sitting of CARCom on the 5th of December 2025. Noting that the regulator has not consulted with any of the major associations on the matter and industry received the proposals for the first time in the CARCom Pack circulated on 26 November 2025. This will require further unpacking as there are some onerous requirements in the proposed Appendix 3.

In recent days, questions to clarify what the regulator has been planning were directed at the Industry Liaison Forum (ILF) and at the Airworthiness Forum. The details shall be available in the minutes as the regulator makes these available. Simply there is no change other than there has been internal work at the regulator to prepare a proposal agreed to by the regulator's management to CARCom.

It was clearly stated that the regulator confirmed no change to the status quo and that any changes will follow the timelines and stages of the CARCom process.

Please note that the CARCom process is a defined and time-consuming process and cannot be seen as a quick fix. There are questions as to why the CARCom process will work this time but hopefully there are lessons learnt that will facilitate this.

The industry should prepare for a minimum of a 4 – 6-month timeline to manage public comment and conclude the recommendation phase, followed by the Minister's or DCAs promulgation of the amendment. We trust all involved will ensure they understand and manage their expectations in the process.

Note: The Festive Season holidays will have an effect on the timeline.

2. The Alternative means of compliance (AMOC)

The participants in this matter intend to press ahead with individual AMOC applications. The data and application packs have been completed and were showcased at the industry meeting held on 26 November 2025.

Application for the members of these associations for the AMOC pack can be made to the email addresses below. These will be furnished upon request only to members that have contributed and participated in the process to date.

The AMOC timelines detailed in the SLS will most probably take 60 – 90 days due to capacity and volume.

Please note: *Those that may be successful in their individual AMOC applications should ensure that they*

have their aircraft that have been standing brought back into service with guidance from their AMO's and additionally for the pilots that have not flown to take steps to regain currency to do this in a safe manner.

3. The Constitutional quandary regarding separation of powers

On advice from our legal team considering these new proposals we should keep the constitutional challenge prepared and hold it in abeyance at this stage. Timelines and costs have been delivered, and industry associations have made provision should it be necessary to return to the legal challenge.

4. Damages continue to build

The damages suffered by the industry continue to increase and participants in the challenge have been requested to continue to keep record should it be necessary to make a class action for damages which will also be held in abeyance to give the regulator a time to make good on the errors made that have resulted in the current situation.

5. CAASA, AeCSA, AWAC, AAG and AMOSA CARCom participation

CAASA and AeCSA as official members with voting rights on CARCom have confirmed the strategy for CARCom which is along the lines of what was already asked for and what the purpose of the court case was to achieve and notes that hopefully the contentious content in Appendix 3 can be attended to while the CARCom process follows its timelines.

6. Interim relief

The AIC18/19 Task Team will furthermore be delivering a letter to the regulator to consider once again industry's request for interim relief in the form of a General Notice considering that the matter has changed to a PART 91 and part 141 matter. This we hope will be similar to the precedent set when the regulator favourably granted two exemptions (requested by CAASA on behalf of the industry) to facilitate the previous part 43 CARCom process, that did not deliver the desired results. We hope that the Director will apply her mind similarly, and trust that considering the plight of the industry this may be favourable.

The AMOC packs may be requested, and certain details will be required to issue the packs:

Send an email with the subject line as follows:

"AMOC 12 year (name of person, name of company, name of organisation, membership number if AeCSA member)"

Example: Email Subject line: "**AMOC 12 year (K Storie, Company A, CAASA, CAASA01)**"

Note: We will implement email filters to ensure issuance is prioritized.

Make sure the subject line is correct.

The AMOC packs will be available from 8 am 27 Nov 2025 up and until the 9 December 2025

The request for the AMOC pack will be confirmed and recorded before issuing the AMOC pack.

- salome@aeroclub.org.za
- kev@caasa.co.za

For media enquiries or interviews, please contact:

- **Kevin Storie, CEO of CAASA, kev@caasa.co.za**