



SAMAA memorandum # 17

The South African Model Aircraft Association. CAA ARO #10
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Date: 25 February 2026

From: SAMAA Management Committee (SMC)

For: All SAMAA Members, Clubs and SIG Committees

1. Purpose

To keep members informed—early, openly, and without speculation—about ongoing SACAA-led **Part 149 amendment discussions** and an upcoming meeting between multiple **Aviation Recreation Organisations (AROs)**.

This memo is **informational**. **No immediate changes** to SAMAA membership requirements, club operations, event rules, or insurance arrangements are implemented by this memo.

2. Background

SACAA has indicated that **SACAR Part 149 requires amendment** and that the work is being approached on a “**clean slate**” basis. The objective is to clarify what constitutes **recreational activities**, and to distinguish these clearly from **training and commercial activities** regulated elsewhere (including **Part 96** and **Part 141**).

In parallel, an industry meeting between AROs was scheduled for **Tuesday, 24 February 2026**, to discuss practical matters affecting the current Part 149 / ARO operating environment.

3. Key SACAA Points (as shared via the Part 149 workgroup material)

The SACAA workgroup framework highlights the following key principles and requirements:

- **Freedom of association:** Everyone has the right to freedom of association, and Part 149 must be developed in a manner aligned to this principle.
- **Recreational definition clarity:** Part 149 amendments must clearly define **recreational activities** and ensure these do **not conflict** with activities conducted for **remuneration or reward** (as defined in Part 1 of the CARs), and must remain distinct from training/commercial frameworks (including Part 96 / Part 141).
- **ARO requirements must be clearly articulated:** The amendments must clearly articulate what approved AROs must comply with when performing **safety and security responsibilities** in accordance with their approval.
- **Non-powered recreational aviation provisions:** SACAA recognises the need to provide for **non-powered recreational aviation** (where aircraft may not be registered and are outside ICAO scope—examples include parachute, paraglider, glider and **model aircraft**) and that a level of **peer-supervision under the ARO** supports safe operations and improved operational monitoring.

SACAA’s “clean slate” structure also indicates that Part 149 content will cover topics such as:

- **Applicability** (who Part 149 applies to)
- **Type of recreational activity** (definitions; “aviation recreation”; definition of an ARO)



- **ARO privileges / responsibilities / requirements** (what AROs can do; what they are responsible for; what they must have in place)
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4. Part 149 ARO Requirements (indicative items referenced in the SACAA material)

The workgroup material lists the type of internal governance and operating elements expected from approved AROs, including:

- Constitution of the organisation
 - Code of conduct
 - Ethics policy
 - Internal disciplinary **and appeal** procedures
 - **MOP** (Manual of Procedures)
 - **QMS** (Quality Management System)
 - Resources
 - Required post holders
 - Membership requirements
 - Standard Operating Procedures, including:
 - Member monitoring
 - Peer supervision
 - Safety policy describing how sector-specific safety will be maintained
 - Reporting obligations, including:
 - Reporting of trends (safety/activity/repeated items) to SACAA
 - Obligation to report transgressions (where applicable)
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5. What is Under Discussion at the ARO Meeting (24 February 2026)

The ARO meeting will consider practical topics, including (non-exhaustive):

- What is working and what is not working in the current Part 149 / ARO framework
 - Authority vs accountability: what AROs can practically do to monitor members and address unsafe conduct
 - Consistency of standards across multiple AROs (including baseline outcomes in MOP/SOPs)
 - Disgruntled members forming multiple AROs and the impact on safety and administration
 - Inter-ARO alignment: how AROs can co-exist without undermining industry safety
 - Safety and SMS-type functions: occurrence reporting, investigations, and feedback loops
 - Oversight expectations and operational monitoring
 - Role of clubs and sites, including visiting pilots and access rules
 - Administrative duplication and cost of running the system
 - Delegation / “under the auspices” considerations and definitional clarity
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6. What is NOT Changing Right Now

- **SAMAA membership remains valid and unchanged.**
 - **SAMAA club rules and safety requirements remain in force.**
 - **SAMAA event procedures remain in force.**
 - **SAMAA insurance arrangements remain as currently structured.**
 - **No member is required to take any immediate action** as a result of these discussions.
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7. SAMAA's Approach and Principles

SAMAA supports a disciplined, audit-ready approach to Part 149 compliance that protects members and the sport. In the discussions, SAMAA will advocate for outcomes that preserve:

- **Clear accountability:** responsibility must be traceable and aligned to the authority to manage safety.
- **Consistent minimum safety baselines:** where multiple AROs exist, baseline MOP/SOP outcomes should not fall below agreed minimum standards.
- **Practical club/site interoperability (where applicable):** any cross-ARO visiting arrangements must be **verifiable** (good standing and currency) and must not create untrackable risk transfer.
- **Meaningful safety reporting and learning:** consistent reporting, proportionate investigations, and feedback to members and clubs.
- **Protection of the recreational boundary:** recreational operations must remain distinct from training/commercial activity regulated under other Parts.

8. Transparency and Next Communication

SAMAA will issue a brief summary update after the **24 February 2026** ARO meeting, outlining:

- what was discussed,
- any proposed pathways, and
- whether member consultation is required for potential policy changes.

Members and clubs are welcome to submit concise input (questions, risks, and practical considerations) via their **Club Chairperson / Club Safety Officer** for consolidation to SAMAA.