



ICAO

TENTH MEETING OF THE REGIONAL AVIATION SAFETY GROUP - ASIA AND PACIFIC REGIONS (RASG-APAC/10)

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RASG-APAC/10-IP/6

Agenda Item 5

Agenda Item 5: ICAO / Member State / Industry Presentations

PACIFIC ISLANDS OFF-SITE CERTIFICATION AUDITS (OSCA) PROCESS

(Presented by the Pacific Aviation Safety Office)

SUMMARY

This paper provides an overview of work done by the Pacific Aviation Safety Officer and the 10 member States to provide on-going regulatory oversight under COVID-19 restrictions. The paper provides information on the assessment results and proposed process for Off-site Certification Audits (OSCA) to be implemented. These audits would be conducted by staff remotely and not onsite during the audit process.

1. INTRODUCTION

1.1 The Pacific Aviation Safety Office (PASO) is an international organisation providing aviation safety and security services for Member States in the Pacific including regulatory safety oversight services.

1.2 The current Pacific nations signatories include the Cook Islands, Kiribati, Nauru, Niue, Papua New Guinea, Samoa, the Solomon Islands, Tonga, Tuvalu, and Vanuatu. Associate Members of PASO are Australia, Fiji and New Zealand. Government representatives from these nations make up the PASO Council.

1.3 The COVID-19 Pandemic has seriously impacted normal operations across the world and heavily impacted aviation. The need to restrict the virus spread has resulted in border restrictions on travel. This has also disrupted the normal PASO assistance to States which is by way of an Inspector pool mainly from Australia and New Zealand. This has resulted in some certification processes needing to be deferred, increasing risk.

1.4 Following requests from States, PASO initiated work to carry out assessments by way of off-site or desktop certification audits and other tasks that would traditionally be done in-country or on-site using PASO inspectors.

1.5 Due to challenges that currently exist it is anticipated there are many outcomes in relation to OSCA implementation including, but not limited to the following:

- a) The normal (pre-COVID-19) desk top tasks, mostly documents review, would continue;
- b) Based on State capacity assessment, certain onsite task would be difficult to be replaced by OSCA for a State;
- c) Tasks that are candidate for OSCA will also be dependent of the level of State systems, legal framework, resource availability, technological (internet) capacity;

- d) What can be done in one State may not be possible in another; and
- e) In States where OSCA is feasible during COVID-19, an Onsite visit should be scheduled immediately once travel restrictions are lifted.

2. DISCUSSION

2.1 The Aviation Specialist funded under the World Bank Pacific Aviation Safety Office (PASO) Reform Project was tasked to undertake this work which included:

- a) Investigate Off-site Certification Audit (OSCA) process
- b) Interim paper to assess if offsite/desktop audit is possible and could be achieved without compromising safety and security.

2.2 The interim paper was accepted in early September and the next stage was approved:

- a) Further development of a full report on an Off-site Certification Audit process
- b) Approves engagement with PASO staff, PASO States, PASO Inspectors and, where needed through States, with Operators.

International Oversight guidance

2.3 Review was made of ICAO guidance material especially COVID-19 operational guidance and associated Quick Reference Guides.

2.4 International guidance on off-site or remote oversight was assessed and incorporated into the report including:

- a) The International Air Transport Association (IATA)
- b) The United States Federal Aviation Authority
- c) The European Union Aviation Safety Agency
- d) Civil Aviation Authority of New Zealand
- e) The Flight Safety Foundation

Assessment process

2.5 Two surveys were used to form the basis of this report. A survey of PASO States covering certification status (including exemptions issued or certificate extensions), certification task requirements, resources and technology available. A separate survey of PASO Inspectors was used to get their feedback on such a process, tools required and any risks, controls or support needed.

2.6 The surveys and discussions with States and Inspectors identified some common themes regarding the success of the proposed process:

- a) Positive outcome as States and PASO interact more
- b) Need to manage stakeholder expectations
- c) Communication is important
- d) Line of responsibility must be clear
- e) PASO assistance and management important

- f) Directors and CAA must take responsibility to ensure OSCA is successful in their State
- g) High trust model with operators required to be fully involved in process
- h) Operators and CAA will need to be well prepared

2.7 A Risk Table was developed of common risk themes and possible mitigations from the surveys and the review of international guidance.

2.8 A Human Factors assessment identified some areas that need addressing resulting in the need for a training programme to accompany the proposed new OSCA process.

2.9 States and Inspectors were supportive of the OSCA concept but did raise several issues that needed to be addressed. They agreed the need for some type of oversight was required given the COVID-19 ongoing impacts.

2.10 Legal and regulatory risks were assessed for the State, PASO and the assigned Inspectors which identified no major issues.

2.11 PASO would need to develop a specific OSCA policy and procedure covering its use along with specific criteria to be met on an individual task basis. OSCA is a tool in the certification toolbox and does not replace a full certification process including demonstration and inspection on-site.

2.12 Once the process and procedures were finalised a training and education programme would be developed to PASO staff, State regulatory staff and PASO inspectors. This would be part of the current PASO Masterclass training and education series.

2.13 Before full implementation a test OSCA will be completed to trial the process and assess effectiveness.

2.14 The General Manager PASO and the PASO Council met on 2 December 2020 and reviewed the proposal for an OSCA process and agreed to allow off-site certification audits to be undertaken.

3. IMPLEMENTATION CHALLENGES

3.1 A number of challenges to effectively support OSCA was identified during the first phase of the study. In particular the different aviation system capacity in each PASO member State to support the effective implementation of the OSCA. These include:

- a) adequacy of the State regulatory framework, systems and infrastructure;
- b) different staffing levels and capability of these staff;
- c) number of qualified technical personnel in country compatible with the task or the person to be audited;
- d) technology systems and capacity.

3.2 Given the challenges in paragraph 3.1, it is expected that a common framework will be adopted but with a differentiated implementation approach. The differentiation would be determined by a set of criteria to determine which audit area or discipline, and in which State OSCA use would be possible. In this context it is anticipated that:

- a) the pre-COVID-19, or normal, offsite assessment of documents before an Inspector travels to a State for in-country audit would continue;

- b) OSCA would take place for a PASO State that meets the OSCA capacity definition and criteria for the specific work or discipline to be undertaken;
- c) for a PASO State that does not meet the OSCA criteria for the work to be undertaken, an alternative arrangement to be agreed supported by a risk assessment to ensure safety standards are not compromised;
- d) in-country certification visits to be undertaken as soon as travel is allowed.

3.3 A further assessment will be conducted regarding the issues identified in 3.1 and other issues, that could potentially limit or impede the use of OSCA. Including any possible liability if OSCA is implemented in a particular State and assessing to ensure the mitigation measures are adequate.

3.4 The OSCA framework is planned to be finalised in January 2021 and offered to those PASO States that qualify under the OSCA criteria soon after.

4. ACTION BY THE MEETING

4.1 The Meeting is invited to:

- a) Note the contents of this paper;
- b) Discuss methods of conducting certification oversight in a COVID-19 environment;
- c) Share experience and lesson-learnt of different States in coping with certification and oversight processes under COVID-19 restriction; and
- d) Discuss any relevant matters as appropriate.

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