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**AGENDA ITEM 5: AVIATION SECURITY AND
FACILITATION**

**THE CHALLENGES OF FOREIGN AIRCRAFT OPERATORS
QUALITY CONTROL ACTIVITIES CONDUCTED BY
THE STATE**

(Presented by Thailand)

INFORMATION PAPER

SUMMARY

Thailand monitors approximately 160 foreign aircraft operators, each mandated to submit Supplementary Station Procedures (SSPs) that comply with both national and ICAO standards. Variation in regulatory requirement, language limitations, and diverse security practices present significant challenges during QC activities. However, Thailand remains firmly committed to aviation security and advocates for stronger international coordination to enhance the harmonization of global security oversight.

THE CHALLENGES OF FOREIGN AIRCRAFT OPERATORS QUALITY CONTROL ACTIVITIES CONDUCTED BY THE STATE

1. INTRODUCTION

1.1 It is widely known that all aircraft operators are subject to the regulatory frameworks of both their State of Registry and the States into which they operate. Accordingly, each of the foreign aircraft operator is required to establish, implement and maintain a written supplementary station procedures (SSP) that meets the requirements of the host State, in addition to those of its own State.

1.2 Since 2024, Thailand has received a substantial number of SSP submissions from foreign aircraft operators by means of using the template provided by CAAT. These procedures must be submitted to the Civil Aviation Authority of Thailand (CAAT) for review and approve prior to implementation to ensure alignment with the National Civil Aviation Security Programmes (NCASP). At present, approximately 160 foreign aircraft operators conduct operations to and from Thailand.

1.3 In addition to the requirement for SSP approval, ICAO **Annex 17** obliges each State to ensure the Quality Control (QC) mechanisms are in place to regularly monitor all entities with aviation security responsibilities, including foreign aircraft operators providing services from that State. Consequently, all 160 foreign aircraft operators are subject to QC oversight. While many States conduct such activities based on their own risk assessments or risk-based approach, Thailand's QC data indicates that the oversight of foreign aircraft operators presents significant challenges.

1.4 This paper outlines the challenges encountered by Thailand in conducting QC activities for foreign aircraft operators. These include coordination difficulties between Thailand and foreign aircraft operators currently operating to or intending to operate to and from Thailand, as well as operational limitations faced by aviation security inspectors, which further hinder the effective implementation of QC measures.

2. DISCUSSION

2.1 Thailand is widely recognized not only a popular tourist destination with high passenger volumes but also as a strategic aviation hub within Southeast Asia. This status has fostered a diverse range of international air transport activities, attracting foreign aircraft operators from across the globe. The demand for air services remain robust, including operations by major international carriers as well as seasonal and semi-permanent charter operators.

2.2 Despite this growth, the approval process of Supplementary Station Procedures (SSPs) submitted by foreign aircraft operators has presented significant challenges for the Civil Aviation Authority of Thailand (CAAT). In parallel, the CAAT has undertaken Quality Control (QC) activities for approximately 160 foreign aircraft operators, employing a risk-based and data-driven approach to prioritize oversight.

2.3 It is evident that foreign aircraft operators currently conducting operations within the Kingdom of Thailand employ a variety of approaches to aviation security. These differences are mainly due to the varying regulatory requirements set by each State, which are reflected in the structure and content of each operator's Aircraft Operator Security Programme (AOSP). It is essential that all SSPs are developed and implemented in a consistent and harmonized manner. However, it appears that certain foreign aircraft operators have encountered difficulties in aligning their AOSPs with Thailand's SSP requirements. This challenge arises despite the fact that Thailand's aviation security standards are based on those established by the ICAO.

2.4 CAAT operates under a comprehensive regulatory framework comprising standards and recommendations from ICAO and national aviation legislation. Foreign aircraft operators whose security practices diverge significantly from these frameworks often encounter difficulties in aligning their SSPs with Thailand's SSP template and regulatory expectations. This misalignment frequently serves as the

initial trigger for QC intervention.

2.5 A number of findings and/or deficiencies in foreign aircraft operators were identified during each Quality Control (QC) activity. One of the main reasons for these findings is that certain foreign aircraft operators were unable to comply with Thailand's SSP. Disputes have also arisen between representatives of foreign aircraft operators and the CAAT, with the former arguing that the root cause of the findings was either a lack of awareness or a refusal to implement the security procedures outlined in the Thailand SSP.

Each foreign aircraft operator has established and implemented its own security procedures based on its respective Aircraft Operator Security Programme (AOSP); however, recent assessment indicate that several operators do not uphold security standards equivalent to those outlined in ICAO Annex 17. For instance, some operators apply different types of security measures, particularly those operating to and from some particular region. Although the security measures provided by these operators are generally accepted internationally, they are sometimes unable to meet the standards set forth in Thailand's SSP, which is originally developed based on the baseline of ICAO Annex 17 and Document 8973. For example, a number of foreign aircraft operators do not possess or do not implement an aircraft security search/check form, which is also required under ICAO standards.

2.6 These discrepancies pose operational challenges for the CAAT inspectors in identifying the root causes of non-compliance. Additionally, communication barriers frequently arise during inspections, as several foreign operators do not use English as their primary language of communication, and in some cases, do not use it at all. These circumstances often result in misunderstandings during the conduct of QC activities.

2.7 Another contributing factor is that Thailand's QC activities primarily assesses compliance with national regulatory requirements as outlined in the SSP, rather than evaluating the practical effectiveness of security measures implemented by foreign operators. This approach may result in the oversight of vulnerabilities that fall outside the scope of Thailand's compliance checklists, which are based on Thai regulations and ICAO standards.

2.8 These challenges also reflect broader operational limitations, particularly in terms of human resources. Overseeing 160 foreign aircraft operators is a challenging task for AVSEC inspectors who must assess various operational model and security standards. These inspectors often face difficulties in aligning foreign operators with Thailand's SSP requirements.

2.9 Aviation security is a shared responsibility that requires coordination among States, industry stakeholders, and international organizations to ensure a secure and resilient global aviation system. To support standardized security measures among all foreign aircraft operators in line with ICAO's expectations, the CAAT remains fully committed to comply with all ICAO safety and security standards. In this regard, ICAO is encouraged to take a more active role in promoting and harmonizing security standards across all Contracting States. Without international coordination, the complex resource-intensive task of oversight falls to individual State.

2.10 In light of these considerations, Thailand continues to prioritizes aviation safety and security at the highest level and remains committed to fully complying with ICAO standards and recommended practices. It is hoped that the dedication of Thai aviation inspectors will make a valuable contribution to a global aviation security and support ICAO's strategic objectives.

3. ACTION BY THE CONFERENCE

3.1 The Conference is invited to note the information presented in this Paper.