



ICAO

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Sixth Meeting of the Asia/Pacific Aerodrome Design and Operations Task Force (AP-ADO/TF/6)

Langkawi, Malaysia, 18 - 21 February 2025

Agenda Item 5: Asia and Pacific Regional Guidance

- **Transposition of Annex 14 ICAO SARPs into National Aerodrome Standards**

**THE USE OF TERM “AS FAR AS PRACTICABLE” IN
ANNEX 14 VOLUME I SARPS**

(Presented by Malaysia)

SUMMARY

This paper examines the challenges and potential risks associated with the term "as far as practicable" in certain ICAO Annex 14 Volume I clauses, which allows flexibility in implementing SARPs by ICAO. These confusions could lead to inconsistent application and compliance to the requirement which may result in different misinterpretations by different parties. To address this, it is proposed that it is necessary to develop clearer ICAO guidelines, implementing a standardized interpretation framework and establishing minimum safety thresholds to ensure consistent and effective decision-making. This paper highlights the importance to harmonize aviation safety practices by ensuring critical safety standards are consistent in implementation and understanding.

1. INTRODUCTION

1.1 The application of language precision is highly needed and appreciated to ensure consistent application and compliance towards ICAO Annex 14 Volume I requirement. However, phrases like "as far as practicable," are naturally open to broad interpretation. The use of unambiguous language helps in ensuring requirements are easily understood and applied as intended in order to reduce differences in interpretation. Hence, clarity and interpretation in language are essential in promoting safety, harmonization, and effective communication.

1.2 The term "as far as practicable" appears 15 times in Annex 14 Volume I, i.e. 10 times in recommendations, 2 times in attachments, 2 times in notes and once in standard. Following are some examples:

- **3.4.6 Recommendation.**— *An object situated on a runway strip which may endanger aeroplanes should be regarded as an obstacle and should, **as far as practicable**, be removed (page:3-11).*
- **3.5.4 Recommendation.**— *A runway end safety area should, **as far as***

practicable, extend from the end of a runway (page:3-15).

- **3.5.7 Recommendation.**— *An object situated on a runway end safety area which may endanger aeroplanes should be regarded as an obstacle and should, as far as practicable, be removed (page:3-15).*

1.3 On this basis, there is a need to look into the effects of possible misinterpretation of broadly-defined phrases and the consideration of risks when applying them inconsistently. Thus, this paper intends to look into ways to address these issues through clearer guidance and standardized interpretation.

2. DISCUSSION

Problem Statement

2.1 The term "as far as practicable" appears several times in Annex 14 Volume I of the ICAO document, providing States and airport operators with flexibility in implementing Standards and Recommended Practices (SARPs). Specifically, this flexibility is intended to account for differences in operational, geographical, technical, and financial conditions among States. However, the subjective nature of the term poses significant challenges to uniform interpretation and implementation.

2.2 The absence of clear guidelines or criteria to define "practicable" creates room for varying interpretations, leading to potential inconsistencies in execution. Whilst some States may adopt comprehensive measures, others may interpret the term too generally resulting in incomplete hazard mitigation or the introduction of safety risks. Accordingly, such misinterpretations can undermine the intended purpose of SARPs causing jeopardizing the harmonization of aviation safety and competencies.

2.3 Consecutively, failing to address this issue could lead to unaddressed hazards, increased safety risks or non-compliance with the intended spirit of the SARPs. Besides, the lack of clear guidelines or criteria for determining what is "practicable" exacerbates this issue, creating room for varying interpretations that may undermine efficiency.

Recommendations

2.4 In highlighting the ambiguity surrounding the term "as far as practicable," it is essential for States to develop clear, comprehensive guidelines that define the term in the context of Annex 14 Volume I. These guidelines should outline specific criteria that States can use to evaluate what is considered "practicable," such as technical feasibility, financial considerations and the operational environment based on the result of safety assessment or other related technical assessment. In addition, the inclusion of decision-making tools to help standardize the interpretation and application of the term, ensuring that all stakeholders have a shared understanding of the expectations and requirements for compliance.

2.5 Simultaneously, a standardized interpretation framework to guide States in evaluating when and how "as far as practicable" should be demonstrated. This framework should incorporate structured decision-making processes that include risk assessments, safety priorities and practical constraints such as operational limitations. In detail, a step-by-step methodology would ensure that all States approach the term systematically, minimizing the risk of inconsistent implementation. Furthermore, these could include checklists or decision trees to help regulators assess the appropriateness of SARPs adoption in different local contexts.

2.6 To avoid compromising aviation safety due to the lack of specificity in implementing SARPs, the establishment of minimum safety thresholds is encouraged and must be met by all States. These thresholds ensure critical safety standard such as aerodrome safety or runway management which are always adhered to regardless of local constraints. Concurrently, this approach ensures that the fundamental principles of aviation safety are open-ended in its application. States are required to justify any deviations from these minimum standards with documented risk assessments.

3. ACTION BY THE MEETING

3.1 The meeting is invited to:

- a) note the information contained in this paper;
- b) share relevant best practices by other States/Administrations Asia-Pacific Region;
- c) suggest ICAO to develop guidance materials on interpretation and effective implementation; and
- d) discuss any relevant matters as appropriate.

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