



ICAO

International Civil Aviation Organization

The Seventh Meeting of the Asia/Pacific Aerodrome Design  
and Operations Task Force (AP-ADO/TF/7)

(Bangkok, Thailand, 17 to 20 February 2026)

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## Agenda Item 5: Asia and Pacific Regional Guidance

### SUGGESTIONS ON REDUCING AMBIGUOUS EXPRESSIONS IN STANDARDS AND IMPROVING THE COMPLIANCE MANAGEMENT MECHANISM

(Presented by CHINA)

#### SUMMARY

This paper presents the ambiguous expressions such as "wherever practicable" in Annex 14 standards have affected the uniformity and seriousness of safety in the implementation of the provisions. To clarify the implementation boundaries and manage reasonable exceptions, the Civil Aviation Administration of China has established a formal procedure based on risk assessment through the "*Provisions on the Management of Operational Safety Deviations and Exemptions for Commercial Transport Airports*". It is suggested that the meeting review and promote two aspects of work: first, gradually reduce the ambiguous expressions in the standards; second, encourage member States to establish similar formal deviation management mechanisms.

## 1. INTRODUCTION

1.1 According to foreword of Annex 14, the "Standards" are norms that all Contracting States must uniformly comply with, and formal notification procedures must be followed when deviations are truly necessary.

1.2 This means that the standard terms themselves should be clear and unambiguous to ensure consistency and seriousness in their global implementation.

1.3 However, some standard terms contain conditional expressions such as "wherever practicable". Such ambiguous wording embeds exceptions within the standards, weakening their mandatory nature and potentially leading to inconsistencies in compliance verification among different countries.

## 2. DISCUSSION

2.1 The "standards" should provide a globally uniform safety benchmark. The direct use of ambiguous terms such as "wherever practicable" in the provisions hands over the discretion of compliance to the implementing party, which leads to three major problems: First, "practicable" lacks an objective scale and is easily influenced by local factors, undermining the uniformity of the standards; second, contracting States may use this to evade the formal notification obligation stipulated in Article 38 of Convention on International Civil Aviation, affecting the transparency of the safety situation; third, it may give rise to subjective disputes over whether the "practicable" conditions are met during audits, increasing the complexity and uncertainty of supervision.

2.2 Taking Article 3.4.3 of Annex 14, Volume 1 (Width of runway strips) as an example, although it stipulates specific width values, it simultaneously adds the qualification "wherever practicable", which leads to ambiguity in the scope of application of this crucial safety requirement. If it is truly impossible to meet the requirement due to objective constraints, the proper approach should be to initiate a formal deviation application and approval process, rather than relying on vague exception clauses in the standard text.

2.3 To systematically address standard compliance challenges, the Civil Aviation Administration of China (CAAC) has promulgated the "Provisions on the Management of Operational Safety Deviations and Exemptions for Commercial Transport Airports", thereby instituting a formalized, procedure-driven deviation management framework. Under this framework, all deviation requests must be substantiated by comprehensive technical documentation and rigorous safety risk assessments. Flexibility is thus deliberately embedded—not as an ad hoc concession, but as an integral component of an evidence-based, transparent administrative review process designed to uphold the highest safety standards without compromise.

### **3. ACTION BY THE MEETING**

3.1 The meeting is invited to:

- a) confirm the core requirement in the Preamble of Annex 14 that "standards" must be uniformly implemented globally and that formal notification is required when they cannot be adhered to;
  - b) review the long-term impact of ambiguous expressions such as "wherever practicable" in the standard terms on the consistency and conformity determination of global safety standards;
  - c) encourage States to establish or improve their own formal deviation and exemption management mechanisms, and handle situations where full compliance with the standards is not possible through transparent procedures based on risk assessment;
  - d) recommend the International Civil Aviation Organization gradually reduce ambiguous wording in the standard provisions in future revisions and develop globally applicable deviation management guidance materials to promote the standardization and consistency of safety management.
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# Reduce the ambiguous expression of standards and improve the compliance management mechanism

February, 2026



- 1、 **Agenda Item 5.**
- 2、 **ICAO Recommendation (Annex 14):**  
“wherever practicable”.
- 3、 **CAAC:** 《 Provisions on the Management of Operational Safety Deviations and Exemptions for Commercial Transport Airports 》

## 运输机场运行安全偏离和豁免管理办法 (试行)

### 第一章 总 则

**第一条** 为规范运输机场运行安全偏离和豁免工作，确保飞行安全和机场正常运行，依据《运输机场使用许可规定》(CCAR-140)、《机场—机场设计和运行》(《国际民航组织公约》附件14第I卷)，制定本办法。

**第二条** 运输机场(包括军民合用机场民用部分，以下简称机场)运行安全偏离和豁免的申请、批准和实施工作，适用本办法。

**第三条** 偏离是指当机场某项运行安全的保障条件不完全符合规章、行政规范性文件或者标准时，经安全评估能达到同等安全水平或者基于国家和公共利益的需要，由民航管理部门按照规定予以批准的行为。

豁免是指机场某项运行安全的保障条件不符合运行安全规章、行政规范性文件或者标准时，经安全评估能达到同等安全水平或者基于国家和公共利益的需要，由民航管理部门按照规定予以批准的行为。(见附件1)

偏离可以有期限，也可以长期有效；豁免应当有期限，且一般不超过三年。

# 2

## Introduction

### "Standards" :

- must adhere to uniformly, and formal notification procedures must be followed when deviations are necessary.
- should be clear and explicit to ensure consistency and seriousness in global implementation.
- Conditional expressions such as "wherever practicable" and ambiguous, weakening its enforceability and potentially leading to inconsistencies in conformity verification among countries.



### Three major problems:

First, "feasible" lacks an objective measure and is vulnerable to local factors, undermining the uniformity of the standard;

Second, States Parties may use this to circumvent the obligation of formal notification under Article 38 of the Convention, affecting the transparency of the security situation;

Third, there is a tendency to raise subjective disputes over whether the "feasible" conditions are met during audits, increasing regulatory complexity and uncertainty.

# 3

## Discussion

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### CASE 1:

#### *Width of runway strips*

3.4.3 A strip including a precision approach runway shall, **wherever practicable,** extend laterally to a distance of at least:

- 140 m where the code number is 3 or 4; and
- 70 m where the code number is 1 or 2;

on each side of the centre line of the runway and its extended centre line throughout the length of the strip.

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# 3

## Discussion

### CASE2:

4.2.23 The dimensions of the surface shall be not less than the dimensions specified in Table 4-2, except that a lesser length may be adopted for the take-off climb surface where such lesser length would be consistent with procedural measures adopted to govern the outward flight of aeroplanes.



# 3

## Discussion

TAKE-OFF CLIMB Slope: 0.02

Recommendation: 1:62.5

《 Evaluation of Flight  
Procedures and Aircraft  
Performance 》

《 Provisions on the Management of  
Operational Safety Deviations and  
Exemptions for Commercial Transport  
Airports 》



# 4

## Action Requested

- a) **Confirm the core requirement : the "standards" must be uniformly implemented and that formal notification is required when compliance is not possible;**
  
- b) **Consider the long-term impact of ambiguous expressions such as "wherever practicable" in the standards;**
  
- c) **Encourage countries to establish or improve their own formal deviation and exemption management mechanisms to handle situations;**
  
- d) **Recommend that the ICAO gradually reduce the ambiguous wording in the standards in future revisions and develop globally applicable guidance materials for deviation management to promote normality and consistency in safety management.**

*THANKS!*