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Asia and Pacific Office

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(APRAST/25)**

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Agenda Item 4: Presentations – State / Industry / ICAO / Focused Discussion

**JUST CULTURE VOLUNTARY SAFETY REPORTING AND
THE STATE SAFETY PROGRAMME:**

**CONVERGENCE WITH USOAP CMA ASSESSMENT AND
THE GASP FATALITY-REDUCTION GOAL**

(Presented by Pan American Regional Aviation Safety Team)

SUMMARY	
This paper, presented as a companion to APRAST/24–WP/08, addresses a recurring concern in the Pan America region that some States treat preparation for USOAP Continuous Monitoring Approach (CMA) activities and the implementation of just culture-based Voluntary Safety Reporting Programmes (VSRPs) as competing priorities. The paper presents the documented convergence between the State Safety Programme (SSP) infrastructure that USOAP CMA will assess from 1 August 2026 under Electronic Bulletin EB 2026/4, the State-level architecture established under ICAO Annex 19 that enables just culture-based VSRPs, and the fatality-reduction goal of the ICAO Global Aviation Safety Plan (GASP). PA-RAST offers this analysis to APRAST as part of the cross-regional collaboration on voluntary safety reporting initiated through APRAST/24–WP/08. Action: The Meeting is invited to: - take note of the information presented regarding the convergence between USOAP CMA assessment of the State Safety Programme, the State-level infrastructure that enables just culture-based Voluntary Safety Reporting Programmes, and the GASP goal of fatality risk reduction; - take note of Electronic Bulletin EB 2026/4 and the applicability of Safety Management Protocol Questions to USOAP CMA activities starting after 1 August 2026, including the dedicated SSP Effective Implementation score; and - take note of the value of continued APRAST/PA-RAST collaboration on just culture-based voluntary safety reporting and on the implications of the convergence described in this paper.	
Strategic Objectives:	Safety
References:	- ICAO Annex 19 – Safety Management - ICAO Doc 10004 – Global Aviation Safety Plan (GASP), 2026–2028 Edition - ICAO Doc 9734 – Safety Oversight Manual, Part A - ICAO Doc 9735 – Continuous Monitoring Manual (USOAP CMA) - ICAO Doc 9859 – Safety Management Manual, Fourth Edition

	• ICAO Electronic Bulletin EB 2026/4 (30 January 2026) • APRAST/24–WP/08 – Aviation Safety Action Programme Initiative for the Asia Pacific Region • RASG-PA ESC/40 — WP/03 – Aviation Safety Action Programme Initiative for the Pan America Region • AFAC Advisory Circular CA SA-064.1/19 (12 December 2019) • U.S. FAA Order 8900.1, Volume 11, Chapter 2 – Voluntary Safety Programs • U.S. FAA Advisory Circular AC 120-66 – Aviation Safety Action Program.
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1. INTRODUCTION

1.1 At APRAST/24, PA-RAST presented APRAST/24–WP/08 (Aviation Safety Action Programme Initiative for the Asia Pacific Region), which introduced the RASG-PA Aviation Safety Action Programme (ASAP) Initiative and invited APRAST to consider whether elements of the Pan America approach might support APAC discussions on just culture-based voluntary safety reporting. This paper builds on that engagement and addresses a specific concern that has emerged in PA-RAST’s outreach with States in the Pan America region, and which may also be relevant in the Asia Pacific context.

1.2 The concern is that some States perceive preparation for USOAP Continuous Monitoring Approach (CMA) activities and the implementation of just culture-based Voluntary Safety Reporting Programmes (VSRPs) as competing investments. When trade-offs arise between resources directed at audit preparation and resources directed at building the legal, regulatory and cultural foundations of voluntary reporting, the latter is often deprioritized on the assumption that it does not directly contribute to the State’s USOAP performance.

1.3 The purpose of this paper is to present the documented convergence between (a) the State infrastructure that enables just culture-based VSRPs, (b) the State Safety Programme (SSP) elements that USOAP CMA will assess from 1 August 2026 under Electronic Bulletin (EB) 2026/4, and (c) the fatality-reduction goal of the ICAO Global Aviation Safety Plan (GASP). PA-RAST offers this analysis to APRAST as part of the ongoing cross-regional collaboration on voluntary safety reporting initiated through APRAST/24–WP/08.

2. DISCUSSION

2.1 *The underlying objective: fatality risk reduction under the GASP*

2.1.1 The purpose of the ICAO Global Aviation Safety Plan (GASP) is to continually reduce fatalities, and the risk of fatalities, associated with accidents. The GASP vision is to achieve and maintain the aspirational safety goal of zero fatalities in commercial operations by 2030 and beyond.

2.1.2 The GASP identifies a series of Global High-Risk Categories of Occurrences (G-HRCs) that need to be addressed to mitigate the risk of fatalities. The G-HRCs are selected based on actual fatalities, fatality risk per accident, or the number of accidents and incidents.

2.1.3 The State Safety Programme (SSP), as established by ICAO Annex 19, is the framework through which a State manages aviation safety at the national level. It is therefore the principal mechanism through which a State contributes to the GASP fatality-reduction goal.

2.1.4 The contribution of just culture-based voluntary safety reporting to fatality risk reduction is not a position unique to one regulator. ICAO Doc 9859 (Safety Management Manual, Fourth Edition) addresses voluntary safety reporting as a core element of the SSP and SMS frameworks through which States and service providers identify hazards and manage risk. The U.S. Commercial Aviation Safety Team (CAST), an industry-government collaborative safety team (CST) whose work has been recognized internationally, has identified voluntary reporting programmes — including ASAP, the Flight Operational Quality Assurance (FOQA) programme, and the Air Traffic Safety Action Programme (ATSAP) — as core data sources for the data-driven safety analysis underlying its safety enhancement work. Section 2.5 returns to this evidentiary base in connection with the third return on State investment in just culture infrastructure.

2.2 *USOAP CMA as the measurement of State safety oversight capability*

2.2.1 The USOAP CMA measures a State’s effective implementation (EI) of its safety oversight system, assessed against the eight Critical Elements (CEs) of a State Safety Oversight System defined in ICAO Annex 19, Appendix 1, with implementation guidance provided in ICAO Doc 9734 — Safety Oversight Manual, Part A. The Protocol Questions (PQs) are the primary instrument through which EI is measured.

2.2.2 The GASP includes, among its goals, the strengthening of States’ safety oversight capabilities. USOAP CMA is ICAO’s mechanism for measuring such capability. USOAP performance is therefore not an end in itself; it is the documented measurement of the State’s capability to fulfil its safety oversight obligations and, through them, contribute to the GASP fatality-reduction goal.

2.2.3 A consequence of this relationship is that any State investment which strengthens both USOAP performance and the State’s underlying capability to reduce fatality risk should be regarded as a single investment producing two outcomes — not as a trade-off between competing priorities.

2.3 *The 1 August 2026 development: dedicated SSP EI under EB 2026/4*

2.3.1 Through Electronic Bulletin EB 2026/4 (30 January 2026), ICAO confirmed that the Safety Management Protocol Questions — comprising both the State Safety Programme (SSP) PQs and the Safety Management System (SMS) PQs — become applicable to all USOAP CMA activities starting after 1 August 2026.

2.3.2 From that date, USOAP CMA activities will produce a dedicated SSP EI score, as well as an EI score for each SSP component, to measure the State’s effective implementation and maintenance of an SSP.

2.3.3 This represents a substantive change in how SSP implementation factors into USOAP results. Under the previous State Safety Programme Implementation Assessment (SSPIA) methodology, SSP-related PQs were assessed in terms of maturity progress and did not affect a State’s EI score. From 1 August 2026, the State’s effective implementation of its SSP will be measured through dedicated EI scoring, including the State-level elements established under Annex 19 — among them the legal and regulatory framework for voluntary safety reporting and the protection of safety data and safety information.

2.4 *Just culture VSRPs and the State's access to safety information*

2.4.1 Annex 19 establishes the State's responsibility to collect, protect, and analyse safety data and safety information. Chapter 5 requires States to establish both mandatory and voluntary safety reporting systems, and Appendix 3 establishes the principles for the protection of safety data, safety information, and related sources from inappropriate use.

2.4.2 Just culture-based VSRPs operate within this framework through a deliberate architecture that separates two distinct functions: (a) the protection of individual report content from inappropriate use, and (b) the State's access to the safety intelligence the programme produces. Both functions are essential, and the protection function is what makes the access function possible — without confidentiality, employees do not report.

2.4.3 In the documented model represented by the U.S. ASAP, individual report content is protected from public disclosure under national legislation and regulation, and is not available to the State for enforcement purposes against the reporting employee. Safety data captured by the VSRP is not integrated into the State's Safety Data Collection and Processing System (SDCPS); the protective architecture would not function if it were.

2.4.4 The State nonetheless gains substantive access to the safety intelligence the programme produces through its participation in the Event Review Committee (ERC). The State representative on the ERC reviews individual accepted reports as they are processed, and participates in the ERC's annual review of the programme database to determine whether corrective actions have been effective in preventing or reducing the recurrence of safety-related events. De-identified information on events reviewed by the ERC may be used within the State for safety improvement purposes such as surveillance planning, policy development, and rulemaking.

2.4.5 The intelligence the State accesses through this channel includes information that would not otherwise be available to the regulator. The U.S. model defines a "sole-source" report as one for which all evidence of the event available is derived from the voluntarily submitted report itself. Sole-source events are by definition events the State would not learn of through mandatory occurrence reporting, surveillance, or any other conventional oversight mechanism. The ERC channel gives the State systematic visibility into these events and into the precursor-level intelligence they carry across the operator population.

2.4.6 This is a structural feature of just culture-based VSRPs that mandatory occurrence reporting cannot replicate. Mandatory systems capture events of a defined severity and type; they do not capture the weaker signals, near-events, and procedural deviations that frequently sit upstream of accidents. Just culture VSRPs are designed to capture precisely that category of information, and the ERC channel provides the State with visibility into it in a form that respects the protections required by Annex 19 Appendix 3.

2.5 *The convergence: a single State investment, three documented returns*

2.5.1 The previous sections describe three distinct ICAO and State frameworks: the GASP fatality-reduction goal (2.1), the USOAP CMA assessment of State capability including the SSP EI from 1 August 2026 (2.2 and 2.3), and the Annex 19 SSP elements that enable just culture-based VSRPs (2.4). These frameworks share a common dependency.

2.5.2 The State-level enabling infrastructure required for just culture-based VSRPs — primary legislation protecting safety information, regulations enabling non-punitive voluntary reporting, the SDCPS framework, and the protections established under Annex 19 Appendix 3 — is the same State-level infrastructure assessed under Annex 19 and reflected in the SSP EI from 1 August 2026.

2.5.3 A single State investment in this infrastructure therefore produces three documented returns (See Appendix A):

- a) **Effective implementation under the SSP EI assessment.** Annex 19 elements covering State legislation, regulations, SDCPS framework and protections, and the establishment of voluntary safety reporting are part of the State Safety Programme assessed under USOAP CMA from 1 August 2026.
- b) **Access to safety intelligence not otherwise available.** As described in 2.4, just culture-based VSRPs give the State governed visibility — through its participation in the Event Review Committee — into precursor-level events and sole-source risks that are not available through mandatory occurrence reporting or surveillance, and that would not exist without the legal and regulatory architecture the State puts in place.
- c) **Contribution to the GASP fatality-reduction goal.** Identifying precursors before they become accidents is the operational mechanism through which fatality risk is reduced. ICAO Doc 9859 (Safety Management Manual) establishes voluntary safety reporting as a core element of the SSP and SMS frameworks through which hazards are identified and risk is managed. As an example, in the United States, the regulator has documented that ASAP-type programmes are essential to identifying potential precursors to accidents and to further reducing the accident rate. The U.S. CAST has identified ASAP, FOQA and ATSAP as core data sources for the data-driven safety analysis underlying its portfolio of safety enhancements; over the period during which CAST and these voluntary reporting programmes matured, the U.S. commercial aviation fatality risk decreased by 83 per cent between 1998 and 2008 — a reduction the FAA attributes to CAST's work together with other actions and initiatives — and continued to decline thereafter. The 2023 FAA National Airspace System Safety Review Team Report concluded that voluntary reporting programmes such as ASAP and ATSAP “provide enormous value and insight into the operation in ways not accessible through other data collection programs.” Across these sources, the consistent position is that just culture-based voluntary reporting provides the safety intelligence — the precursor and weak-signal data — that conventional oversight mechanisms cannot, and that this intelligence is foundational to fatality risk reduction.

2.5.4 The three returns are not additive options — they are different views of the same underlying capability, because all three depend on the same State-level infrastructure. Building that infrastructure is a necessary condition for all three: a State that does not establish it cannot satisfy the SSP elements assessed under USOAP CMA that relate to voluntary reporting, cannot gain access to the safety intelligence such programmes produce, and removes the foundation on which the associated contribution to fatality risk reduction depends. Building the infrastructure is necessary for each return; it is not by itself sufficient for the second and third, which also depend on operator adoption of voluntary programmes, as discussed in 2.6.

2.6 *Limits of the convergence*

2.6.1 To preserve the precision of the foregoing analysis, three limits should be stated explicitly.

2.6.2 First, the operator-implemented just culture-based VSRP itself is not a USOAP Protocol Question. The State does not receive USOAP credit for an operator having an ASAP. What is assessed under the new SSP EI from 1 August 2026 is the State's establishment and maintenance of the SSP elements established by Annex 19 — including the legal, regulatory and protection framework that enables such programmes.

2.6.3 Second, just culture-based VSRPs cannot substitute for the State's other safety oversight obligations. Effective implementation of primary legislation, certification, surveillance, and resolution of safety concerns remains assessed independently under the existing CEs of the State safety oversight system. A VSRP-enabling architecture strengthens the SSP dimension; it does not compensate for weakness in the foundational oversight functions.

2.6.4 Third, the State's access to safety intelligence through VSRP channels is a function of the operator population's adoption of such programmes. A State that has built the enabling architecture realizes this benefit only to the extent that operators implement programmes within it. This dependency is a genuine limitation where operator interest is absent; it is substantially resolved where operators are already willing to participate. In either case it reinforces, rather than undermines, the case for the State to establish the infrastructure: without the State-level legal and regulatory foundation, willing operators cannot implement just culture-based VSRPs at all.

3. Pan America Observations

3.1 At APRAST/24, PA-RAST presented APRAST/24–WP/08 (Aviation Safety Action Programme Initiative for the Asia Pacific Region), introducing the RASG-PA Aviation Safety Action Programme (ASAP) Initiative and inviting APRAST to consider whether elements of the Pan America approach may support APAC discussions on just culture-based voluntary safety reporting. That paper described the establishment of the RASG-PA ASAP Working Group, the ongoing pilot project with a State, an airline and its employee group, and the strategy adopted by RASG-PA ESC/40.

3.2 As PA-RAST has carried this initiative forward in the Pan America region, a recurring observation has emerged in outreach with States. Some States, when weighing competing demands on limited civil aviation authority resources, treat preparation for USOAP CMA activities and the implementation of just culture-based VSRP infrastructure as separate and competing priorities. The implementation of voluntary reporting infrastructure is in some cases deferred on the assumption that it does not contribute to the State's USOAP performance. In cases observed in the Pan America region, operator interest in just culture-based VSRPs preceded State enablement; the limiting factor was not industry willingness but the absence of the State-level legal and regulatory foundation. Where that foundation is the only missing element, the safety-intelligence return described in section 2 is not contingent on uncertain future uptake but on a State decision to proceed.

3.3 The convergence described in section 2 indicates that this assumption is substantially overstated. The State-level legal and regulatory infrastructure required for just culture-based VSRPs is the same infrastructure assessed under the SSP EI from 1 August 2026, and the same infrastructure that supports the State's contribution to the GASP fatality-reduction goal. A State that defers VSRP-enabling work is, in practical terms, also deferring SSP-related work that USOAP CMA will assess.

3.4 The convergence is observable in the Pan America region beyond a single State. Mexico established an Aviation Safety Action Programme framework within its State safety architecture through national instruments — the Mexican Official Standard for SMS and *AFAC Advisory Circular CA SA-064.1/19 (12 December 2019) — Aviation Safety Action Programme implementation*— issued expressly to give effect to Annex 19 Amendment 1, including the safety-data protection provisions on which voluntary reporting depends. Under that framework the State participates in the operator's Event Review Committee through designated points of contact, in explicit support of risk-based surveillance, while individual report content remains protected under national law and is not used for enforcement against the reporting employee. Mexico illustrates that the State-level infrastructure described in section 2 — and its convergence with the SSP elements USOAP CMA will assess — is being built under a national legal system distinct from that of the United States, reinforcing that the convergence follows from the structure of ICAO frameworks rather than from any single State's model.

3.5 PA-RAST offers this observation to APRAST as part of the cross-regional collaboration initiated through APRAST/24–WP/08. The convergence between SSP implementation, just culture-based VSRP enablement, and fatality risk reduction is not specific to the Pan America region; it follows from the structure of ICAO frameworks (Annex 19, USOAP CMA, and the GASP) and applies wherever those frameworks apply.

3.6 As the RASG-PA ASAP Initiative continues, including through the ongoing pilot project, PA-RAST intends to share with APRAST relevant insights on how the convergence framing has been received by States and operators in the Pan America region — including developments in other States now considering similar frameworks through administrative regulatory instruments rather than primary legislation — in line with the cross-regional information sharing commitment established at APRAST/24.

4. Suggested Actions

4.1 The Meeting is invited to:

- a) take note of the information presented regarding the convergence between USOAP CMA assessment of the State Safety Programme, the State-level infrastructure that enables just culture-based Voluntary Safety Reporting Programmes, and the GASP goal of fatality risk reduction;
- b) take note of Electronic Bulletin EB 2026/4 and the applicability of Safety Management Protocol Questions to USOAP CMA activities starting after 1 August 2026, including the dedicated SSP Effective Implementation score; and
- c) take note of the value of continued APRAST/PA-RAST collaboration on just culture-based voluntary safety reporting and on the implications of the convergence described in this paper.

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APPENDIX A — CONVERGENCE SCHEMATIC

Figure A-1 presents the convergence described in this paper in schematic form.

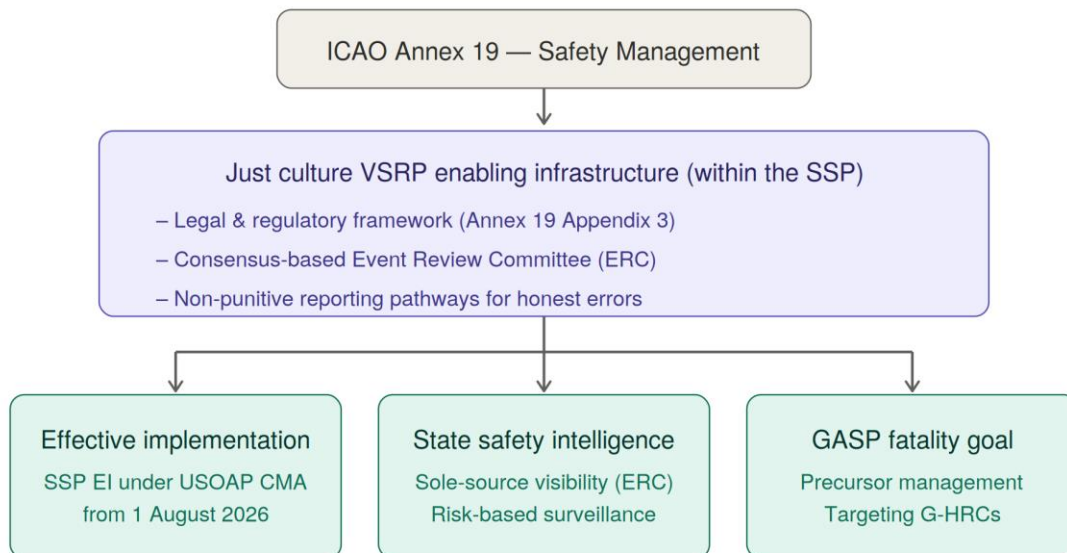


Figure A-1. The State-level just culture VSRP enabling infrastructure as a single investment yielding three documented returns (see Section 2.5).

- A.1 ICAO Annex 19 establishes the State Safety Programme (SSP), within which the State builds the legal, regulatory and cultural infrastructure that enables just culture-based Voluntary Safety Reporting Programmes — principally the framework for the protection of safety data and safety information (Annex 19 Appendix 3), a consensus-based Event Review Committee, and non-punitive reporting pathways for honest errors and procedural deviations.
- A.2 This single body of State-level infrastructure produces three documented returns. First, it constitutes SSP elements that USOAP CMA will assess through the dedicated SSP Effective Implementation (EI) score applicable from 1 August 2026. Second, through the State’s participation in the Event Review Committee, it provides access to safety intelligence — including visibility into sole-source events — that is not available through mandatory occurrence reporting or surveillance, and that supports risk-based surveillance. Third, by enabling the identification and management of accident precursors, it contributes to the GASP goal of reducing fatalities and the risk of fatalities, including the mitigation of the Global High-Risk Categories of Occurrences (G-HRCs).
- A.3 This diagram illustrates the central point of Section 2: these returns are not the product of three separate investments competing for State resources, but three views of a single underlying State capability.

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