



Just Culture Voluntary Safety Reporting and the State Safety Programme

WP/09 Convergence with USOAP CMA Assessment and the GASP Fatality-Reduction Goal

Presented by PA-RAST · APRAST/25 · Agenda Item 5



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A false trade-off

Some States treat USOAP CMA preparation and just culture-based voluntary safety reporting as competing investments — funding one at the expense of the other.

USOAP CMA preparation

Resources directed at audit readiness and the State safety oversight system.

VS

Just culture VSRP implementation

Resources directed at the legal and cultural foundations of voluntary reporting — often deferred.

This paper shows they are the same investment.

Purpose: to present the documented convergence between the State infrastructure that enables VSRPs, the SSP elements USOAP CMA assesses from 1 August 2026, and the GASP fatality-reduction goal.

The Objective: Reducing Fatalities

Zero fatalities

The GASP vision for commercial operations by 2030 and beyond — and the underlying objective of all of this work.

The Global High-Risk Categories

The GASP targets the G-HRCs — the occurrence categories selected on actual fatalities and fatality risk.

The State Safety Programme

Established by ICAO Annex 19, the SSP is the principal national mechanism through which a State contributes to that goal.

Assembly momentum — A42-WP/259

The 42nd Assembly was invited to acknowledge positive safety culture — non-punitive reporting at its core — as foundational to reducing accident risk.

USOAP CMA measures State capability

USOAP CMA measures a State's Effective Implementation (EI) of its safety oversight system, assessed against the eight Critical Elements defined in Annex 19, Appendix 1 (guidance in Doc 9734, Part A). Protocol Questions are the instrument.

USOAP performance is not an end in itself. It is the documented measurement of a State's capability to fulfil its oversight obligations — and, through them, to reduce fatality risk.

The consequence

Any investment that strengthens both USOAP performance and the underlying capability to reduce fatality risk is one investment producing two outcomes — not a trade-off between competing priorities.

What changes on 1 August 2026

1 AUG 2026

Per Electronic Bulletin EB 2026/4 (30 January 2026), the Safety Management PQs (SSP and SMS) apply to all USOAP CMA activities starting after this date.

Before — SSPIA

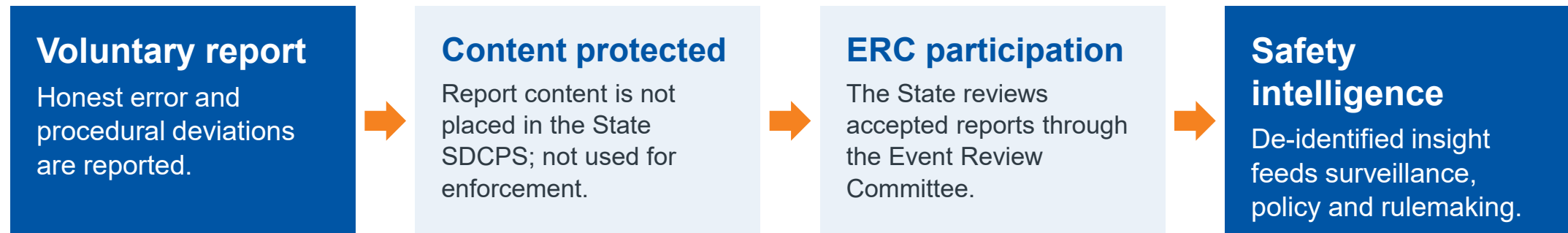
SSP-related PQs were assessed as maturity progress only. They did not affect a State's EI score.

From 1 Aug 2026

CMA produces a dedicated SSP EI score, and an EI score for each SSP component. The State-level elements that enable voluntary reporting — legislation protecting safety information and its protections — are now scored capability.

How the State accesses the safety intelligence

Just culture VSRPs separate two functions: **protecting individual report content**, and giving the State **access to the safety intelligence** the programme produces. The protection is what makes the access possible.



This captures sole-source and precursor signals — weak events upstream of accidents that mandatory occurrence reporting and surveillance do not reach.

One investment, three returns

ICAO Annex 19 — Safety Management

ONE STATE INVESTMENT — JUST CULTURE VSRP ENABLING INFRASTRUCTURE, WITHIN THE SSP

Legal & regulatory framework protecting safety information (Annex 19 Appendix 3) · Consensus-based Event Review Committee (ERC) · Non-punitive reporting pathways for honest errors

1

SSP Effective Implementation

Scored under USOAP CMA from 1 August 2026 as part of the State Safety Programme.

2

Access to safety intelligence

Governed visibility, through the ERC, into precursor-level and sole-source events.

3

Contribution to the GASP

Identifying precursors before they become accidents is how fatality risk is reduced.

Necessary for all three returns; by itself sufficient only for the first. The second and third also depend on operator adoption. · This figure appears as Appendix A of the working paper.

What the convergence does not claim

01

An operator's VSRP is not a USOAP Protocol Question

The State is not credited for an operator having an ASAP. What is assessed is the State's establishment of the Annex 19 SSP elements that enable such programmes.

02

VSRPs do not substitute for other oversight obligations

Primary legislation, certification, surveillance and resolution of safety concerns remain assessed independently under the existing Critical Elements.

03

The intelligence and fatality returns depend on operator adoption

The State enables the architecture; operators implement programmes within it. Willing operators, however, cannot proceed at all without the State foundation.

The Pan America experience

A recurring observation

In PA-RAST outreach, industry interest in just culture-based voluntary reporting has often preceded State enablement.

The limiting factor was not industry willingness — it was the absence of the State-level legal and regulatory foundation.

Where that foundation is the only missing element, the safety-intelligence return turns on a State decision to proceed.

Mexico — at State level

An ASAP framework built through national instruments: the Mexican Official Standard for SMS and AFAC Advisory Circular CA SA-064.1/19 (12 December 2019).

Issued to give effect to Annex 19 Amendment 1, including the safety-data protection provisions on which voluntary reporting depends.

The State participates in the operator's ERC through designated points of contact; report content remains protected under national law.

A civil-law system distinct from the United States — evidence that the convergence follows from the structure of ICAO frameworks, not any single State's model.

RASG-PA ASAP Initiative — where implementation stands

Colombia

Pilot — stalled; re-engaging

Leadership transitions at the CAA and the participating operator interrupted execution. Interest is intact — continuity broke. A Letter of Intent will anchor commitments across future leadership changes as we re-engage.

Brazil

Advancing — instrument in development

Moving faster than the pilot. ANAC expects an enabling mechanism in place for its major operators by the end of 2026, through an administrative regulatory instrument.

Caribbean

Emerging — operator-initiated

An operator has expressed interest in implementing ASAP. PA-RAST is engaging the State's CAA to establish the enabling pathway.

THE CONSTRAINT IS EXECUTION CONTINUITY — NOT INTEREST

Across the region, industry willingness precedes State enablement. Letters of Intent will anchor State and operator commitments across leadership transitions.

Suggested actions

The Meeting is invited to take note of:

- a** The convergence between USOAP CMA assessment of the SSP, the State-level infrastructure that enables just culture-based VSRPs, and the GASP goal of fatality risk reduction;
- b** Electronic Bulletin EB 2026/4 and the applicability of the Safety Management PQs from 1 August 2026, including the dedicated SSP Effective Implementation score; and
- c** The value of continued APRAST / PA-RAST collaboration on just culture-based voluntary safety reporting and the implications of this convergence.

Thank You



RASG-PA

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