



ICAO

International Civil Aviation Organization

Eleventh Meeting of the ICAO Asia/Pacific Search and Rescue
Workgroup (APSAR/WG/11)

Bangkok, Thailand, 5 – 8 May 2026

Agenda Item 4: Asia/Pacific and Inter-regional SAR Planning, Coordination and Cooperation

ADDRESSING SAR OVERSIGHT CHALLENGES UNDER THE ICAO USOAP CMA

(Presented by Australia)

SUMMARY

The ICAO Universal Safety Oversight Audit Program (USOAP) Continuous Monitoring Approach (CMA) continues to report that among the services in air navigation, Search and Rescue (SAR) continues to represent the major challenge for States when performing their safety oversight function. This paper provides information on action now underway by the ICAO/IMO Joint Working Group on Aeronautical and Maritime SAR (JWG) which aims to assist with improving this situation.

The APSAR/WG is invited to share its views on this matter and any examples of successful implementation of State SAR service oversight arrangements that comply with ICAO requirements.

1. INTRODUCTION

1.1 The ICAO Universal Safety Oversight Audit Program (USOAP) Continuous Monitoring Approach (CMA) continues to report that many Member States have not implemented effective arrangements for the conduct of surveillance of their aeronautical SAR services in accordance with ICAO State Safety Management provisions.

1.2 At APSAR/WG/10, the ICAO Secretariat presented WP/06 Rev.1 *Regional SAR Status* which reported an analysis of the 16 USOAP SAR-related Protocol Questions (PQs) in April 2025 for Asia/Pacific States. ICAO reported (paragraph 2.7) that major weaknesses in implementation of effective regulatory surveillance oversight of the SAR service provider included lack of oversight of the establishment and maintenance of detailed plans of SAR operations, SAR operational personnel training plans, SAR exercises and mechanisms to eliminate SAR regulatory deficiencies. This has been a consistent regional, and global, weakness for several years.

1.3 The 32nd meeting of the ICAO/IMO JWG-SAR, Sydney, Australia, 3 – 7 November 2025, discussed a paper presented by Australia titled *Efficacy of the ICAO USOAP CMA regarding aeronautical SAR service oversight* (ICAO/IMO JWG-SAR/32-WP.15). This paper outlined factors which currently challenge State implementation of effective oversight arrangements and invited the JWG to consider recommendations to ICAO on possible alternative approaches that may offer other practicable ways for States to implement suitable arrangements. A JWG ad-hoc correspondence group has been formed to consider development of proposals for possible alternative aeronautical SAR service oversight systems.

2. DISCUSSION

Status of Global SAR Oversight Implementation

2.1 Consistent with the status of the Asia/Pacific (paragraph 1.2), ICAO USOAP CMA results globally continue to report a major lack of effective implementation (EI) by many Member States which have not established and implemented an effective system to conduct surveillance of their aeronautical SAR services including oversight of their Rescue Coordination Centres (RCCs) and, where established, Rescue Subcentres (RSCs).

2.2 ICAO's latest triennial [USOAP CMA Results Report 2022-2024](#), section 4.7.2 states:

4.7.2 Search and Rescue services

4.7.2.1 Among the services in air navigation, search and rescue (SAR) continues to represent the major challenge for States when performing their safety oversight function. The overall EI of respective PQs is below 50 per cent and a further breakdown shows that only 33 per cent of States ensure that their SAR organization coordinates with those of neighbouring States, and 45 percent perform surveillance effectively.

4.7.2.2 Regarding rescue coordination centres (RCCs) and rescue sub-centres (RSCs), about 53 per cent of States ensure that each employs a sufficient workforce in coordination and operational functions. Only 39 per cent of States ensure that their RCCs and RSCs are staffed 24 hours a day by trained personnel proficient in the use of the English language.

4.7.2.3 Only 45 per cent of States ensure that detailed plans of operation for the conduct of SAR within its area are developed in accordance with their national requirements. This includes the identification of designated public or private SAR units that are suitably located and equipped for SAR operations.

4.7.2.4 Roughly 54 per cent of States do not have a mechanism to ensure that SAR personnel are regularly trained, and that appropriate SAR exercises are arranged.

2.3 Similarly, the [USOAP CMA Results Report 2019-2021](#), section 4.7.2, states:

*“Among the air navigation services, SAR is still the service that represents a major challenge for the States performing (the) safety oversight function, mainly because SAR is a State function that often integrates several State entities and the role of the regulator is not clearly defined among them. **The lack of clarity or definition of the role of a safety oversight authority for SAR thus obscures the lack of implementation of ICAO provisions...**”*

2.4 Compliance is further complicated because, as noted in the [USOAP CMA Results Report 2013-2015](#) (paragraph 4.7.4.1), many States' SAR services are provided by military authorities. Coordination between these military authorities and the State's civil aviation authority becomes essential, but in practice the coordination is often limited to the operational aspect of SAR and does not clearly address the continual improvement of SAR, let alone the conduct of surveillance activities and the timely resolution of identified deficiencies. Common factors identified preventing the effective surveillance of RCCs include lack of sufficiently qualified inspectorate staff and the absence of a formal surveillance programme.

Implementation Challenges

2.5 Several factors may be contributing to low EI of SAR oversight by States. Some States are challenged with implementing basic SAR services per ICAO Annex 12 and the requirement to implement SAR oversight arrangements poses an additional challenge to already stretched resources.

2.6 Further to the challenges outlined by the ICAO USOAP CMA Results Reports, implementation of SAR oversight is complicated by variations in how States have chosen to provide their aeronautical SAR services, which may be delegated by the State to entities such as air navigation services providers (ANSPs), civil aviation authorities (CAAs), civil maritime authorities, coast guards, the military, and so on. Not all entities fall neatly within the civil aviation regulatory framework.

2.7 An additional challenge for States with Joint Rescue Coordination Centres (JRCCs) is that there are differing requirements under ICAO and International Maritime Organization (IMO) audit programmes. Whereas ICAO requires independent oversight of State aeronautical SAR services in accordance with ICAO Annexes 12 and 19 to the Chicago Convention, the IMO Member State Audit Scheme (IMSAS) does not audit the Maritime SAR Convention (the maritime equivalent to ICAO Annex 12) and only audits the SAR elements of the International Convention for the Safety of Life at Sea (SOLAS) Convention. States therefore need to consider whether to implement SAR oversight arrangements for only the aeronautical SAR service component of their JRCC, or include arrangements for both the aeronautical and maritime SAR service components in an equitable manner.

2.8 The *Safety Oversight Manual* (ICAO Doc 9734) does not provide clear guidance specific to aeronautical SAR services compatible with the contemporary SAR service arrangements of many States. It is also unclear, as stated in the only specific SAR reference within this manual, how “an empowered CAA” would regulate and oversight SAR services provided by entities such as maritime authorities/regulators, coast guards or the military.

2.9 CAAs may be challenged by not having the necessary SAR expertise within their organization. The CAA may also be unable to source staff with the appropriate SAR qualifications and experience for the required SAR inspector roles, given the likely small number of specialized SAR personnel available in most States.

2.10 States with a consistent record of providing a high standard of SAR service, but that do not have independent SAR service oversight as required by ICAO, may already have other arrangements in place that contribute to the reliable and safe delivery of their SAR services including continuous improvement measures. Such States may find it challenging to justify the need and support of their State for the addition of a layer of oversight, together with the extra funding and resources required, without clear guidance for why it is necessary, or the ability to readily identify outcomes that would justify such an investment.

2.11 The absence of guidance specific to the establishment, implementation and on-going delivery of the oversight of aeronautical SAR services is likely one significant factor contributing to the low level of global implementation. The development of suitable guidance could assist Member States to better understand the ICAO USOAP CMA requirements for SAR services, justify why it is necessary and how to go about implementing suitable arrangements.

Potential Alternatives

2.12 There may be suitable alternatives that differ from the prescriptive ICAO model for SAR oversight but achieve similar outcomes. Such alternatives may involve approaches that are more performance-based, risk-based, and scalable to the size of the SAR service.

2.13 Alternative models could also cater for those States with JRCCs so that both the aeronautical and maritime components are monitored and assessed together. This also aligns with the joint ICAO/IMO goal for the harmonization of aeronautical and maritime SAR systems.

2.14 Australia understands that an acceptable alternative to a State's CAA providing independent oversight of the aeronautical SAR service, is for oversight to be conducted by the same organization that provides the SAR service, conditional upon the oversight arrangement being demonstrated to be clearly independent and functionally separate from the operational SAR and RCC area of that organization.

2.15 In 2023, Australia and New Zealand established a reciprocal SAR services benchmarking arrangement ([APSAR/WG/9 IP/04](#)) where the SAR agencies of both States conduct biennial benchmarking of each other's SAR services. This arrangement does not fulfil the ICAO SAR oversight requirement; however, it could possibly be used as the basis of an enhanced alternative oversight arrangement amongst regional States that especially assists States with limited capability and resources.

JWG Ad-hoc Correspondence Group

2.16 As agreed by JWG/32, an ad-hoc correspondence group, under the coordination of Australia, has been formed to consider development of proposals for possible alternative aeronautical SAR service oversight systems. The correspondence group is in the initial stages of its work and aims to present a working paper with high-level proposals for consideration by JWG/33 scheduled for 9 – 13 November 2026. Selected model proposals can then be developed further by the JWG into detailed recommendations for submission to ICAO for consideration.

2.17 The JWG recognises that some States may prefer the current ICAO oversight model as it suits their State's arrangements and the JWG is not proposing this be revoked. The purpose of the alternative models is to provide States with other options for SAR oversight that could help to improve implementation while achieving the intended ICAO outcome of ensuring that States continuously demonstrate effective, risk-based compliance and mature safety management so that SAR services are systematically managed, hazards are identified and mitigated, and SAR operations are provided safely, reliably, and consistently.

2.18 JWG/32 recognised that the development of clearer guidance could assist States with the implementation of ICAO SAR oversight arrangements. The development of alternative proposals also presents an opportunity for the JWG to include this matter as part of its planned recommendations to ICAO.

2.19 The ad-hoc correspondence group is currently considering some initial alternative proposals which broadly includes:

- a) oversight within a SAR service provider by an internal department which is independent and separate from the SAR operations and RCC function;
- b) oversight by an external agency which makes use of temporary secondments of SAR specialists from the SAR service provider;
- c) multi-State or regional SAR oversight, possibly aligned with the ICAO Regional Safety Oversight Organization (RSOO) model;
- d) hybrid aeronautical and maritime SAR oversight; and
- e) CAA oversight of organisations that provide SAR services other than ANSPs, for example maritime agencies.

2.20 The APSAR/WG is invited to provide comments on the initial alternative proposals and any other possible alternatives which could help inform the JWG's work from an Asia/Pacific regional perspective.

3. ACTION BY THE MEETING

3.1 The meeting is invited to:

- a) note the information contained in this paper;
- b) discuss and provide views on challenges which contribute to the lack of effective implementation of SAR oversight by Asia/Pacific States;
- c) with respect to the current work of the ICAO/IMO JWG ad-hoc correspondence group:
 - i) provide comments on the initial alternative SAR oversight concepts under consideration; and
 - ii) suggest any other possible alternatives which could help inform these considerations from an Asia/Pacific region perspective;
- d) share examples of successful implementation of State aeronautical SAR service oversight arrangements that comply with ICAO requirements; and
- e) discuss any relevant matters as appropriate.

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