

**61ST CONFERENCE OF
DIRECTORS GENERAL OF CIVIL AVIATION
ASIA AND PACIFIC REGION**

*Kuala Lumpur, Malaysia
7 – 11 September 2026*

**AGENDA ITEM 5: AVIATION SECURITY AND
FACILITATION**

**STRENGTHENING FOREIGN OPERATOR OVERSIGHT IN
APAC ON SUPPLEMENTARY STATION PROCEDURES (SSPS)
THROUGH A STANDARDIZED AND COLLABORATIVE
APPROACH**

(Presented by Bangladesh)

SUMMARY

The 18th Amendment to ICAO Annex 17 introduced Standard 3.3.2, requiring States to mandate written Supplementary Station Procedures (SSPs) for foreign operators, aligned to the host State's National Civil Aviation Security Programme (NCASP). The 2025 USAP-CMA Analysis of Audit Results (15th Edition) records the lowest compliance of any Annex 17 Standard for this requirement, at 18 per cent globally and 16 per cent in APAC. In response, the Civil Aviation Authority of Bangladesh (CAAB) developed a standardized "Model SSP" framework enabling foreign operators to conduct a structured gap analysis against the NCASP, supported by industry consultation and formal recognition. The framework strengthens national oversight, reduces administrative duplication, and improves USAP-CMA audit readiness. The "Bangladesh Experience" offers APAC Member States a practical, evidence-based pathway to close the compliance gap on Standard 3.3.2.

STRENGTHENING FOREIGN OPERATOR OVERSIGHT IN APAC ON SUPPLEMENTARY STATION PROCEDURES (SSPS) THROUGH A STANDARDIZED AND COLLABORATIVE APPROACH

1. INTRODUCTION:

1.1 The regulatory architecture governing aviation security has undergone a profound transformation. When ICAO Annex 17 was first created in 1974, it only required airlines to have security programmes for the “State of Registry.” However, the modern threat environment necessitated a decisive shift toward “State of Operation” oversight.

1.2 The introduction of the 18th Amendment to ICAO Annex 17 represents a watershed moment in this evolution. While Standard 3.3.1 reinforces the obligation of the State of the Operator to maintain an Aircraft Operator Security Programme (AOSP), Standard 3.3.2 introduces a critical requirement: Contracting States must now require foreign commercial operators to establish, implement, and maintain written Supplementary Station Procedures (SSPs). These procedures must meet the requirements of the National Civil Aviation Security Programme (NCASP) of the State where the operator provides service.

1.3 The realization of this standard has been significantly facilitated by the collaborative efforts of ICAO and IATA, providing the necessary guidance to harmonize implementation and avoid the pitfalls of documentation redundancy.

2. DISCUSSION

2.1 Bangladesh recognizes the indispensable value of the institutional guidance provided by ICAO and IATA. Resources such as ICAO Doc 8973 (Appendix 24) and the IATA “Full Supporting Guidance for AOSP/SSPs” (released April 2025) have addressed the systemic challenge of administrative duplication and the historical lack of mutual recognition. These materials clarify that SSPs are not intended to be redundant versions of an AOSP, but rather precision tools for localized compliance. These resources empower operators to perform a meaningful gap analysis between their primary AOSP and the local NCASP, ensuring that security measures are effective, station-specific, and audit-ready. However, prior to the formal adoption of standardized SSP guidance, both regulators and operators faced several challenges hampering effective oversight:

2.1.1 **Inconsistency in Implementation:** Variability in how States interpreted approval obligations led to widespread confusion regarding compliance requirements.

2.1.2 **Administrative Redundancy:** Operators faced the prohibitive burden of translating and submitting full AOSPs to every State of Operation, rather than focusing on local gaps.

2.1.3 **Lack of Mutual Recognition:** Regulators often reviewed individual foreign airline AOSPs without acknowledging the rigorous review already granted by the State of the Operator.

2.1.4 **Challenge faced by the Regulator:** Regulators face one-way submissions with a limited effective feedback loop, often compounded by a lack of aviation security expertise at the station level, leading to repeated rejection cycles and inconsistent interpretation across operators.

2.1.5 **Challenge faced by the Foreign Aircraft Operator:** Foreign aircraft operators frequently face challenges in meeting their SSP obligations due to limited clarity on the NCASP requirements of the State of Operation and the operational peculiarities of the local station from which they operate. This creates a critical compliance gap in executing local regulatory requirements.

2.2 The 2025 USAP-CMA Analysis of Audit Results (15th Edition) provides objective, region-wide confirmation of this challenge. As at 31 December 2025, global compliance with Annex 17 Standard 3.3.2, the SSP requirement stood at only 18 per cent, the lowest indicative compliance for any Annex 17 Standard. The APAC figure is lower still, at 16 per cent, compared with a regional Annex 17 compliance average of 62.78 per cent and a regional compliance rate of 75 per cent for the directly related Standard 3.3.1 (AOSP).

Annex 17 Standard	Global Compliance	APAC Compliance
3.3.1 – Aircraft Operator Security Programme (AOSP)	77%	75%
3.3.2 – Supplementary Station Procedures (SSP)	18%	16%
APAC Annex 17 regional average (all Standards)	–	62.78%

Source: 2025 USAP-CMA Analysis of Audit Results, 15th Edition, Table 3.3.1.

2.3 Recognizing these challenges, the Civil Aviation Authority of Bangladesh (CAAB) has initiated a “Model SSP” framework designed to simplify compliance and ensure that all foreign commercial aircraft operators meet the required security standards.

2.4 The Model SSP Concept and Gap Analysis: To ensure regulatory alignment, CAAB developed a standardized "Model Station Security Programme" (SSP) framework. Foreign operators are required to use this tool to conduct a structured gap analysis, comparing their home-state Aircraft Operator Security Programmes (AOSPs) against the specific mandates of the National Civil Aviation Security Programme (NCASP) of Bangladesh.

2.5 **The Implementation Process:** CAAB executes this framework through a transparent, five-stage methodology:

2.5.1 **Framework Development and Distribution:** A dedicated CAAB technical team drafted the Model SSP to reflect Bangladesh’s national aviation security requirements. This draft was distributed via the Airline Operators Committee (AOC) Bangladesh to all foreign operators for review, feedback, and initial gap analysis against their respective AOSPs.

2.5.2 **Industry Consultation:** From 5 to 8 April 2026, CAAB hosted targeted workshops with 70 participants representing 36 foreign airlines. These sessions clarified local regulatory expectations, shared best practices, and prepared operators for upcoming ICAO Universal Security Audit Programme (USAP-CMA) activities.

2.5.3 **Submission:** Operators are required to submit a completed, localized SSP for each international airports in Bangladesh, where they operates from.

2.5.4 **Review and Scrutiny:** The CAAB Aviation Security (AVSEC) Division conducts a rigorous technical evaluation of the submissions to verify strict compliance with the NCASP.

2.5.5 **Formal Recognition:** Upon successful verification, CAAB issues an official approval letter and a validated "CAAB Control Page," confirming that the operator's local security procedures satisfy all national requirements.

2.6 The adoption of the Model SSP framework fundamentally enhances Bangladesh's aviation security landscape by driving standardization, oversight, and operational accountability. By integrating robust quality control measures, the framework brings more constructive, targeted oversight approach under the National Quality Control Programme (NQCP). Furthermore, it streamlines audit readiness for regulators, airports, and foreign aircraft operators through a highly structured approach to documentation. Finally, the framework ensures strict local compliance and seamless execution by mandating the designation of a trained, locally knowledgeable Aviation Security Manager/Officer to maintain clear liaison accountability.

2.7 The success of the Model SSP framework underscores the effectiveness of a collaborative approach between the regulator and the aviation industry. A cornerstone of this success was the partnership between the Airline Operators Committee (AOC) Bangladesh and CAAB; the AOC played a pivotal role in facilitating high-level coordination both with the regulatory authority and among its member carriers. During workshops held at CAAB Headquarters from 5 to 8 April 2026, representatives from 33 international carriers provided critical feedback that was instrumental in refining the template. Participation by 61 attendees reflects strong industry commitment, enabling operators to align their internal procedures with Bangladesh's national security requirements and fostering a culture of transparency and shared responsibility for aviation security.

2.8 The "Bangladesh Experience" serves as a viable, evidence-based roadmap for APAC Member States confronting a challenge regarding the approval obligation of foreign aircraft operator's SSP. By adopting a standardized "Model SSP" template and engaging in proactive industry consultation, States of Operation can close the compliance gap on Standard 3.3.2, enhance security, reduce administrative friction, and provide a clear regulatory pathway for foreign operators.

3. ACTION BY THE CONFERENCE

3.1 The Conference is invited to:

- a) recognize the global and regional challenges in the effective implementation of ICAO Annex 17 Standard 3.3.2, noting that it currently records the lowest compliance of any Annex 17 Standard, at 18 per cent globally and 16 per cent in the APAC region;
- b) urge Member States to adopt the standardized "Model SSP" framework, or a suitable equivalent approach incorporating industry consultation, to align foreign operator procedures with national requirements in a manner that is both practical and effective; and
- c) encourage APAC States to share best practices arising from their implementation experience.

— END —

Definition of SSPs: *"Supplementary procedures annexed to the AOSP that meet any requirements of other States where operations are conducted that are not addressed in the AOSP. They are risk-based, operations-focused documents designed to ensure alignment with the State of Operation's NCASP."* - IATA/ICAO Guidance, April 2025

Executive Summary for consideration for inclusion in the Conference Report

STRENGTHENING FOREIGN OPERATOR OVERSIGHT IN APAC ON SUPPLEMENTARY STATION PROCEDURES (SSPS) THROUGH A STANDARDIZED AND COLLABORATIVE APPROACH

The 18th Amendment to ICAO Annex 17 introduced Standard 3.3.2, requiring Contracting States to mandate written Supplementary Station Procedures (SSPs) for foreign commercial operators, aligned to the National Civil Aviation Security Programme (NCASP) of the State of operation. This marks a decisive shift from "State of Registry" to "State of Operation" oversight and closes critical security gaps by ensuring that local requirements exceeding an operator's home-state Aircraft Operator Security Programme (AOSP) are formally documented, verified, and executed.

The 2025 USAP-CMA Analysis of Audit Results (15th Edition) confirms that implementation of this Standard remains the weakest worldwide. As at 31 December 2025, global compliance with Standard 3.3.2 stood at 18 per cent and APAC compliance at 16 per cent — the lowest indicative compliance recorded for any Annex 17 Standard — against a regional Annex 17 average of 62.78 per cent. This deficiency stems from long-standing systemic frictions: inconsistent interpretation of approval obligations, administrative duplication, and the absence of mutual recognition between States.

In response, the Civil Aviation Authority of Bangladesh (CAAB) developed a standardized "Model SSP" framework. The framework enables foreign operators to conduct a structured gap analysis between their AOSP and the NCASP of Bangladesh, and is delivered through a transparent methodology covering template development and distribution, industry consultation, station-specific submission, technical scrutiny, and formal recognition. It strengthens national oversight, reduces administrative burden, improves USAP-CMA audit readiness, and reinforces local accountability through designated security personnel.

The "Bangladesh Experience" offers APAC Member States a practical, evidence-based pathway to close the compliance gap on Standard 3.3.2. The Conference is invited to recognize the challenge, urge Member States to adopt a standardized "Model SSP" approach supported by industry consultation, and encourage the sharing of regional best practice.