



International Civil Aviation Organization

MIDANPIRG/23 & RASG-MID/13 Meetings

(Cairo, Egypt, 14 – 18 June 2026)

Agenda Item 4.3: Other Emerging Safety Matters

**OVERSIGHT OF SAFETY MANAGEMENT SYSTEMS FOR FOREIGN APPROVED
MAINTENANCE ORGANIZATIONS**

(Presented by the United Arab Emirates)

SUMMARY

This Working Paper highlights the challenges faced by MID States regarding the implementation and oversight of Safety Management Systems (SMS) for foreign approved maintenance organizations (AMOs/MROs).

Several MID States approve and oversee foreign maintenance organizations located outside their territory to support operators and continuing airworthiness activities. However, varying regulatory interpretations and oversight practices currently exist regarding how SMS oversight should be applied and recognized for such foreign approved organizations, particularly when the organization is already subject to oversight and SMS requirements by its State of Registry or primary approval authority.

The paper seeks harmonized regional understanding and guidance regarding harmonized expectations for SMS implementation applicable to foreign approved maintenance organizations, including possible oversight approaches, proportional implementation methods, and coordination between approving authorities.

Action by the meeting is at paragraph 3.

REFERENCE

- ICAO Annex 19 – Safety Management
- ICAO Doc 9859 – Safety Management Manual (SMM)
- ICAO Annex 8 – Airworthiness of Aircraft
- ICAO Doc 9760 – Airworthiness Manual

1. INTRODUCTION

1.1. The implementation of Safety Management Systems (SMS) has become a fundamental element of aviation safety oversight and organizational risk management.

1.2. In accordance with ICAO Annex 19, States shall establish SMS requirements in accordance with ICAO Annex States shall establish SMS requirements in accordance with ICAO Annex 19 for certain aviation service providers, including approved maintenance organizations exposed to safety risks associated with aircraft maintenance activities, hereafter called “foreign approved maintenance organisations”.

1.3. Many States issue approvals to foreign maintenance organizations located outside their territory to support operators, contracted maintenance activities, component maintenance, engine overhaul, and specialized services.

1.4. However, differing implementation currently exist among States regarding:

- how SMS requirements should be applied in practice for foreign approved maintenance organizations;
- the extent of SMS implementation expected from such organizations;
- whether reliance may be placed on the SMS initial and continuous acceptance performed by the primary approval authority; and
- how oversight responsibilities should be coordinated between authorities.

1.5. The absence of harmonized regional guidance may result in inconsistent oversight practices, duplication of regulatory requirements, and implementation challenges for both States and industry. And divergence in expectation from different States.

2 DISCUSSION

2.1 Foreign approved maintenance organizations may already be subject to SMS requirements imposed by:

- the State of the Organization;
- the primary approval authority; or
- another recognized aviation authority under bilateral or technical arrangements.

2.2 In some cases, the approving foreign authority may require full SMS implementation as part of its approval framework, while other authorities may not mandate SMS for equivalent maintenance activities or may not fully mandate the SMS requirement as per ICAO Annex 19.

2.3 This creates practical regulatory questions for States, including:

- Should States mandate SMS for all foreign approved AMOs?
- To what extent can States accept SMS oversight performed by another authority?
- What level of SMS implementation and maintenance should be expected for organizations with limited scope of work?
- How should SMS oversight responsibilities be coordinated between authorities?
- What proportional approach should apply to small organizations or component workshops?
- Is additional ICAO guidance required to States and Industry to implement and maintain SMS?

2.4 Additionally, implementation challenges may arise when:

- the foreign organization is already operating under multiple authority approvals;
- oversight access is limited due to geographical or geopolitical considerations;
- the organization holds only limited or specialized ratings; or
- SMS terminology and implementation standards differ between authorities.

2.5 A harmonized ICAO guidance framework could support States by:

- promoting consistent oversight expectations;
- reducing unnecessary duplication of oversight activities;

- supporting risk-based and proportional implementation;
- facilitating recognition of equivalent SMS systems; and
- improving coordination between approving authorities;
- supporting consistent USOAP-CMA assessment practices be provided to USOAP Auditors.

2.6 The Working Paper therefore proposes that ICAO MID, in coordination with MID States and relevant stakeholders, consider developing guidance material or discussion papers addressing SMS applicability and oversight expectations for foreign approved maintenance organizations.

3 ACTION BY THE MEETING

3.1 The meeting is invited to:

- a) note the information contained in this paper;
- b) review the challenges associated with SMS implementation and oversight for foreign approved maintenance organizations;
- c) request ICAO MID, in coordination with States and relevant stakeholders, to study possible approaches for proportional and harmonized SMS implementation applicable to foreign approved maintenance organizations; and
- d) invite ICAO to consider, as appropriate, the outcome of the regional discussion.

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