



WORKING PAPER

THIRTEENTH AIR NAVIGATION CONFERENCE

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COMMITTEE B

**Agenda Item 6: Organizational safety issues
6.1 Strategic plan**

GLOBAL AVIATION SAFETY PLAN

(Presented by the United States)

EXECUTIVE SUMMARY

This paper is intended to express the strong support of the United States for the continued evolution of the *Global Aviation Safety Plan* (GASP, Doc 10004). The GASP serves a critical purpose in aligning efforts towards the improvement of safety worldwide. Since its inception in 1997, the GASP has evolved to prioritize areas where greatest impact towards safety could be gained. The United States proposes the following recommendations for consideration by the Thirteenth Air Navigation Conference.

Action: The Conference is invited to:

- a) support the proposed revision to the GASP for the 2020-2022 triennium;
- b) prioritize the development of a sustainable safety culture to enable continuous improvements in safety with the support of stakeholders;
- c) promote improved integration and coordination between Planning and Implementation Regional Groups (PIRGs) and Regional Aviation Safety Groups (RASGs) while ensuring that each retain their independent functions;
- d) continue to support the implementation of safety management by States and Industry;
- e) support the work of ICAO to identify the Universal Safety Oversight Monitoring Audit (USOAP) Protocol Questions with focus on those that indicate direct, effective safety oversight; and
- f) recommend that ICAO re-evaluate the proposed performance indicator in the GASP revision.

1. INTRODUCTION

1.1 The United States strongly supports the continued evolution of the *Global Aviation Safety Plan* (GASP, Doc 10004) as the high-level framework to strengthen safety worldwide. GASP priorities should remain focused on reducing the global accident rate, and continuous improvement of safety oversight capabilities.

1.2 As the high-level strategic plan for ICAO, States, and stakeholders to evaluate performance improvements for aviation safety, it is important that the manner and mechanism of

measurement is effective, accurate, and capable. Therefore, as a matter of urgency, the proposed revision of performance measurement for the next iteration of the GASP should be addressed to ensure that States and stakeholders can be confident in the outputs.

1.3 The key to continuous improvements in aviation safety is to create a sustainable culture of safety through an open and transparent exchange of safety information and data between the State and the aviation community. Safety culture is not just a set of programs and cannot simply be “established” or “implemented”. A safety culture requires the open and transparent exchange of information, mutual cooperation, and trust. A just regulatory culture is essential to building effective, non-punitive, safety reporting and data-sharing programs.

1.4 At a global level, the GASP strives to enhance aviation safety through this approach; specifically by promoting a positive safety culture, encouraging collaboration, protecting safety data, promoting the sharing and exchange of safety information, and data driven decision-making.

2. DISCUSSION

Evolving safety culture

2.1 Starting in the 1970s, the United States established a framework for the aviation community to share safety data in a non-punitive setting, starting with the Aviation Safety Reporting System and continuing through programs such as the Aviation Safety Action Program, Air Traffic Safety Action Program, Flight Operations Quality Assurance and the Voluntary Disclosure Reporting Program.

2.2 The FAA and industry established the Commercial Aviation Safety Team, the General Aviation Joint Steering Committee, the U.S. Helicopter Safety Team, the Unmanned Aircraft Systems Safety Team, and the Aviation Safety Information Analysis and Sharing Program. These government-industry partnerships formed to increase public safety by adopting an integrated, data-driven strategy to reduce the fatality risk in commercial air travel and general aviation. Their efforts focus on safety data analysis and sharing, identifying and understanding risks before accidents or incidents occur.

2.3 All of these aforementioned vital safety programs were controversial at their inception. Now the programs and approach to aviation regulation and safety is an internationally recommended best practice. The success of these voluntary safety programs has demonstrated that a collaborative approach, supported by a positive safety culture, provides the highest levels of compliance with regulations, the most effective identification of hazards, and the most efficient management of risks.

Regional collaboration

2.4 Due to the unique operational environments of each ICAO region, the Regional Aviation Safety Groups (RASGs) are well suited to assist States in identifying and mitigating operational safety risks within the region. Therefore, it is important that the ICAO regions have the opportunity to review in detail the proposed GASP revision before endorsement by the 40th Session of the ICAO Assembly in 2019.

2.5 To ensure the GASP allows for supporting continuous improvement, the importance of regional collaboration cannot be understated. The United States supports improved collaboration and integration between the regional groups established to enhance safety, the RASGs, and the regional groups established to support air navigation, the Planning and Implementation Regional Groups (PIRGs). The goals and objectives initially established for each group should not come at the expense of another;

both serve critical roles and distinct functions and should remain intact. However, both the PIRGs and the RASGs could enhance their effectiveness by improving their coordination efforts on shared safety areas of interest.

2.6 The success of several of the RASGs to reduce accidents in the regions has been and will continue to be dependent upon the collaboration between government and industry, which has allowed for the sharing of safety information and effective risk mitigation. The results of this collaboration are evidenced through established government and industry partnerships that influence change, and the identification and implementation of the countless safety enhancements identified by the RASGs. In order to maintain the value and benefit of the RASGs to reduce accidents in the region, the continued success of the RASGs and current structure must be sustained and supported by ICAO and States.

Safety Management

2.7 The United States strongly supports continued focus on implementation of safety management by both the member States and industry. Safety management is the umbrella that brings all efforts together in a cohesive manner to enhance the overall safety of the system. Assuming a strong and sustained foundation of safety oversight, States and industry should focus efforts on implementing and enhancing safety management across the aviation system.

USOAP-CMA

2.8 The ICAO Universal Safety Oversight Audit Programme through the Continuous Monitoring Approach provides data supported methodologies for monitoring and measuring States' safety oversight capabilities. The recent effort undertaken by ICAO to identify foundational and priority protocol questions (PQs) encourages States to focus efforts towards areas of direct safety benefit. Effective implementation and continued sustainment of the eight critical elements of safety oversight are the foundation of the integrated State Safety Program (SSP), intended to provide a systemic management framework for safety decision making.

GASP performance measurement

2.9 The United States supports continued development of GASP indicators as discussed in working paper (AN-Conf/13-WP/65), including the replacement of the 60% effective implementation (EI) score with foundational PQs for safety oversight, in conjunction with developing and implementing an SSP.

2.10 However, the introduction of the Safety Oversight Margin (SOM) as the proposed performance measure for the GASP should be re-evaluated. The data and analysis mechanisms used to develop the oversight margin are not transparent and do not appear to provide an accurate measure of safety oversight capability, which is the intent of a performance metric. Therefore, the United States recommends further evaluation of more capable performance indicators. Inclusion of the SOM in its current state will severely undermine the effectiveness of the GASP, as States cannot have confidence in its outputs.

2.11 Instead, the United States strongly suggests proposals from the Group of Experts for a USOAP CMA Structured Review (GEUSR) to utilize a priority protocol question EI score and an implementation EI score, in addition to overall EI score, in order to provide better visibility of the State's safety oversight system.

Emerging safety issues – new entrants

2.12 The 2017-2019 Edition of the GASP addresses global flight tracking, remotely piloted aircraft systems, space transportation and conflict zones as emerging priorities, not as emerging safety issues (as described on AN-Conf/13-WP/12). The introduction of this language (emerging safety issue) to describe potential new technologies, potential public policies, or a new concept or idea in the 2020-2022 GASP leads to a potential conclusion that new entrants are not safe to operate in the airspace. Furthermore, the classification of emerging safety issue places new entrants up to par with conflict zones. New entrants bring new technologies and innovation, whereas conflict zones bring destruction. In the case of commercial space transportation, there is no evidence that suggests that this modality is not safe now, nor is there any evidence to suggest it will become less safe in the future. Therefore, the United States recommends further re-evaluation on the use of terminology on new entrants, new technologies, public policies, concepts and ideas as described in the new edition of the GASP.

3. CONCLUSION

3.1 The United States recommends that the Air Navigation Conference agree to the proposed revision to the GASP, while addressing the recommendations contained above.

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