



WORKING PAPER

THIRTEENTH AIR NAVIGATION CONFERENCE

Montréal, Canada, 9 to 19 October 2018

COMMITTEE B

- Agenda Item 6: Organizational safety issues**
6.1 Strategic plan
6.1.3: Global Aviation Safety Oversight System (GASOS)

VIABILITY OF THE GLOBAL AVIATION SAFETY OVERSIGHT SYSTEM (GASOS)

(Presented by the United States)

EXECUTIVE SUMMARY

The United States supports the need to assist States in improving and strengthening their safety oversight responsibilities and acknowledges the challenges Global Aviation Safety Oversight System (GASOS) seeks to address, as well as the potential benefits that may be possible under the proposed GASOS model. The United States however, has concerns regarding certain foundational elements of GASOS, as well as with ICAO's implementation strategy. The purpose of this paper is to highlight those concerns for further discussion.

Action: The Conference is invited to agree to the following actions

- a) the GASOS Study Group should continue to work with the Secretariat to address the political, administrative, legal, and safety related aspects, and ensure the outcomes are acceptable to States, before the program is formally adopted;
- b) this work should include an analysis of the existing and anticipated resources available for safety oversight as part of this work;
- c) ICAO should align existing and proposed programs with similar purposes, as well as other resources already available to States and Regional Safety Oversight Organizations (RSOOs); and
- d) the GASOS Study Group should continue to be utilized with an expanded membership to ensure access to the expertise needed to mature the program.

1. INTRODUCTION

1.1 The United States supports the ICAO *Global Aviation Safety Plan* (GASP, Doc 10004). An effort to support GASP priorities is the development of the Global Aviation Safety Oversight System (GASOS). The United States has actively supported the GASOS Study Group, and this paper is intended

to highlight and promote discussion on concerns surrounding the foundational elements of GASOS and the proposed implementation strategy.

1.2 The intent of GASOS is to establish a network of ICAO-recognized safety oversight organizations, to assist in strengthening safety oversight capabilities and thereby increasing the availability and other Safety Oversight Organizations (RSOs and SOOs). These organizations may then assist resource-constrained States by offering practical and affordable solutions to aid in safety oversight.

1.3 Assembly Resolution A39-14, *Regional cooperation and assistance to resolve safety deficiencies, establishing priorities and setting measurable targets*, encourages ICAO Member States to foster the creation of regional or sub-regional partnerships. The aim is to collaborate on the building of State safety oversight trends and inefficiencies, such as:

- a) air traffic will double in fifteen years, and most of that growth will take place within States that face significant resource constraints;
- b) registration and user business models are changing, further complicating oversight by regulators;
- c) safety oversight systems need to adapt to the future demands of a rapidly expanding aviation industry, along with new technologies and processes;
- d) different regulatory systems, along with the inefficiency of having overlapping auditing and recertification programs, require a rethink of current safety oversight programs;
- e) alternative safety oversight models should be developed to resolve current audit overlapping inefficiencies and address future challenges; and
- f) States should have access to practical and affordable options in the area of safety oversight.

1.4 The United States acknowledges the underlying challenges GASOS seeks to address, as well as the potential benefits that may be possible under the GASOS model.

2. DISCUSSION

2.1 The United States supports the GASOS objective to enable the development and sustainability of State safety oversight capabilities; however, there are some concerns that should be addressed during the developmental phase of GASOS before formal adoption of the program. An example is that States with resource limitations which prevent them from performing their own oversight may also be unable to effectively evaluate the performance of GASOS service providers. This difficulty evaluating a GASOS service provider could potentially move States further away from compliance with ICAO standards and recommended practices (SARPs).

2.2 Another concern is that the GASOS program assumes that resource-constrained States lack the wherewithal to identify appropriate sources for technical assistance. It is more likely that such States lack the financial and institutional resources, or in some cases, the political will, to procure technical assistance. It is unclear whether States will realize a cost savings under GASOS that will remove these barriers.

2.3 It is expected that GASOS implementation will exert considerable financial and human resource demands upon ICAO that it may not be able to address. Under the GASOS model, ICAO will need to task an existing organization, or stand up a new one, to recognize and routinely audit a State or RSOO that will then perform specific safety and/or oversight functions on behalf of a contracting State. This not only implies an initial recognition process, but also an ongoing monitoring function.

2.4 Without effective criteria in place to evaluate the need for services and service providers, ICAO will be obliged to expend resources validating (and revalidating) any organization that makes a request for recognition. One could also foresee that ICAO might find itself accountable for the performance of any organization they have recognized, which may become problematic if there are issues between the SOO and the State. This means there must be a continuous exchange of data related to the effectiveness of the GASOS recognized organization, and any safety concerns that may arise, so that immediate action can be taken to suspend activities. This includes information from other States who are using the same SOO or are impacted by their work. It is not clear how ICAO will leverage the data it needs in this regard.

2.5 Guidance material, inclusive of processes and procedures that would advise States on how to effectively utilize and monitor SOO services in an ICAO-recognized manner, need to be developed and agreed to by States. A State's use of a SOO will likely impact other States, and it is important that all States can have confidence in the SOO's capabilities and performance. In particular, a State or regional organization utilizing a recognized SOO would likely have an impact on existing bilateral agreements with other partners.

2.6 As has been discussed at multiple high-level ICAO headquarters and regional meetings over the last several years, there is a strong need for increased cooperation amongst States to meet the anticipated growth in international air transportation. Programs such as the Civil Aviation Safety Inspector (CASI) recognition programme, the Cross Border Transferability of Aircraft Working Group, continued evolution of the Universal Safety Oversight Audit Program Continuous Monitoring Approach (USOAP CMA), and the RSOO Cooperative Platform are intended to address the challenges faced by an increasingly interconnected international system. Success in each of the programs needs to be clearly aligned so that resources are effectively expended and duplication is avoided. Considering the potential impact and resource support needed for effective implementation of GASOS, alignment across these programs must occur before programmatic roll-out can take place.

2.7 There are also a number of resources available to States and RSOOs that should be considered before developing a new program with similar intent. The ICAO and Federal Aviation Administration began a partnership over 20 years ago to provide high quality, standardized training to CAA inspectors world-wide, based on ICAO SARPS in the Flight Standards areas. This program is the ICAO Endorsed Government Safety Inspector (GSI) training program and includes a series of courses aimed at training inspectors in their certification, surveillance and resolution of safety issues. The ICAO USOAP results have shown that the underlying Model Civil Aviation Regulations (MCARs) and supporting guidance material used in these courses to emphasize standardization have themselves been adapted by a significant numbers of States as the basis for national safety oversight structure.

2.8 In addition, there are resources available for States and regional organizations on how to select and work with technical assistance providers. The United States has developed FAA Advisory Circular 129-5 to show the best practices on how a Civil Aviation Authority (CAA) can ensure a person or contractor is qualified to conduct technical assistance activities for CAAs and any related regional authorities.

3. CONCLUSION

3.1 Safety of the international air transportation system is of the highest priority, and continuous improvement of safety worldwide is dependent on the ability of all stakeholders to collaborate and cooperate effectively. New entrants to the system, coupled with the anticipated growth of air transportation, will continue to be a challenge for States to manage. Resources and programs such as GASOS have the potential to direct States and regional organizations in strengthening safety oversight systems. However, unintended consequences or underdeveloped safeguards may jeopardize the potential benefits of GASOS and could even negatively affect safety if all aspects of the program are not thoroughly analyzed and all concerns fully addressed

3.2 Therefore, the United States recommends that the actions presented in the Executive Summary of this paper be considered by the Air Navigation Conference.

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