



ASSEMBLY — 39TH SESSION

TECHNICAL COMMISSION

Agenda Item 34: Aviation safety and air navigation policy

COMMENTS ON THE UPDATED VERSION OF THE GASP

(Presented by the Dominican Republic)

EXECUTIVE SUMMARY

The Dominican Republic supports the GASP, not solely as an instrument to ensure harmonization and coordination of efforts undertaken to implement and monitor initiatives for the enhancement of the global safety oversight system, but also in its role as a frame of reference for State-level strategic planning.

This Working Paper summarizes the Dominican Republic's comments on the new edition of the GASP.

**Action:** The Assembly is invited to:

- a) request the Secretary General to provide more information to States, which will allow them to combine the tools proposed in the GASP as they see fit in order to guarantee and improve the safety of their State civil aviation systems;
- b) request the Secretary General to clearly establish the requirements that must be included in the safety oversight system to ensure realistic implementation of the SSP;
- c) promote the exchange of information amongst the RASGs to assist States with limited capabilities to better identify their risks;
- d) recommend the design of a new ICAO training strategy, consistent with current and future expectations regarding safety oversight; and
- e) urge States to adapt their strategic safety planning to the updating cycle proposed in the GASP, in order to link together the implementation of global, regional and State-level initiatives.

<i>Strategic Objectives:</i>	This working paper relates to the Safety Strategic Objective.
<i>Financial implications:</i>	It is expected that the Regular Programme budget for the triennium will cover the activities related to GASP implementation; however, ICAO may have to provide additional resources to support other initiatives endorsed by the Assembly.
<i>References:</i>	Doc 10004, <i>2014-2016 Global Aviation Safety Plan</i> Doc 9734, <i>Safety Oversight Manual, Part A</i>

<sup>1</sup> Spanish version provided by the Dominican Republic.

## 1. INTRODUCTION

1.1 International civil aviation has a positive impact on countries' economic growth. It also serves as a catalyst for a significant number of production activities, which in turn bolster trade, stimulate the production of goods and services and develop new job creation capabilities. This creates a 'virtuous cycle' that States, and in particular developing States, should endeavour to use to their advantage.

1.2 ICAO, fully aware of this reality, has mapped out a set of global strategies with the objective of enabling the safe and sustainable growth of air transport operations. Moreover, safety is ICAO's top priority and it also takes account of the fact that passenger confidence has been maintained thanks to civil aviation's excellent safety record.

1.3 ICAO's safety strategy is reflected in the Global Aviation Safety Plan (Doc 10004), with the 2017-2019 edition of this plan being approved by the Council in May 2016.

## 2. ANALYSIS

2.1 Further development of the objectives proposed in the GASP.

2.1.1 The GASP proposes a continuous increase in the safety and efficiency levels of air operations through the establishment of a planning framework for the implementation of a set of initiatives that enable safety improvements to be achieved. However, the GASP does not clearly state that work needs to be done on a continuous basis to consolidate the enablers for each of the Plan's objectives in order for the Plan to further develop. For example, SSP implementation is not an activity that will replace effective safety oversight (the first objective), just as predictive risk management will not replace the SSP.

2.1.2 The Dominican Republic views each of these objectives as complementary, which means that measures can be taken at various levels, with the Critical Elements (CE) of the State Safety Oversight system acting as the cornerstone. The SSP serves as a tool to enable the improvement of safety strategic planning; support risk-based decision-making to optimize oversight plans; prioritize inspections and identify points of major concern as well as opening up new opportunities for the achievement of more specific performance targets. We do not believe that the oversight measures that we are currently developing will be replaced. Rather, we believe that these measures will be improved through additional information to support the decision-making process and then will subsequently evolve towards predictive risk management.

2.1.3 We believe that ICAO needs to clarify that States have the authority to support their safety oversight systems with initiatives that they deem to be effective, while meeting the implementation timelines proposed in the GASP, and can combine the implementation tools as they see fit, in order to ensure and enhance safety within their State civil aviation systems.

2.2 A Frame of Reference for the establishment of effective safety oversight.

2.2.1 The GASP takes an effective implementation rate of CEs of 60% as the parameter for rating effective safety oversight capability and SSP implementation by States in the near-term.

2.2.2 This concept may make sense from a global planning point of view in order to provide a specific target for all of the States that are situated below the global average. However, from a State point

of view, this milestone is unfounded since no specific criteria exist to support the establishment of this milestone, i.e. there are no specific criteria to determine that an effective implementation rate of 60% brings with it the elements needed for SSP implementation. Furthermore, many States with effective implementation rates of 70% or higher may have gaps that significantly restrict their ability to implement the SSP. All States, including those with very high rates, have work to do to improve the effective implementation of the CEs and incorporate new SARPs.

2.2.3 In any event, initiatives undertaken to implement the SSP should not be made subject to the effective implementation rate of 60%. Under the right conditions, SSP implementation can lead to a strengthening of effective safety oversight - these are the conditions that ICAO has to define.

2.2.4 Thus ICAO needs to clarify the SSP implementation requirements, not as a way of dividing States into advanced or non-advanced States, or States able to implement the SSP or not, but rather in order to provide clear guidance that supports realistic implementation of the SSP.

### 2.3 Global Safety Priorities

2.3.1 The global safety priorities remain runway safety-related events, controlled flight into terrain (CFIT) and loss of control in-flight (LOC-I). The comments garnered from the Regional Aviation Safety Groups (RASGs) indicate that these priorities remained valid when producing the 2017-2019 edition of the GASP. However, many States have a limited capacity to collect and analyse information used to determine the latent conditions for the occurrence of any of the events considered as priorities. Moreover, States need to have the capacity to identify other priorities that may differ from the global priorities and are specific to their operational circumstances.

2.3.2 ICAO should strengthen the exchange of information at RASG level and provide tools to assist States with limited capabilities to better identify their risks. The regional offices also need to be more involved.

2.4 The ICAO strategy for improving global effective implementation of CE-4 (Technical personnel qualification and training)

2.4.1 CE-4 (Technical personnel qualification and training) has the lowest percentage of effective implementation of all the CEs on a worldwide scale. This fact in and of itself is striking enough to attract ICAO's attention to States' capacity to produce a sufficient number of inspection personnel with sufficient skills to effectively discharge their safety oversight responsibilities.

2.4.2 SSP implementation requires additional competencies over and above those currently required for technical personnel performing safety oversight functions. Thus, Civil Aviation Authorities should be able to provide this training to their personnel- training that is not readily available for various reasons.

2.4.3 In light of this situation, ICAO needs to design a training strategy that explores different alternatives so that States can make training available to their personnel at a reasonable cost, which is consistent with current and future expectations related to safety oversight.

### 2.5 Reviewing and updating the GASP.

2.5.1 The Dominican Republic agrees that the GASP review cycle should coincide with the Assembly sessions in order to obtain the endorsement of the Member States. States should link up their

strategic planning with the GASP results in order to ensure that the overall planning framework is consistent and produces the desired effect.

2.5.2 ICAO should urge States to adapt their strategic safety planning to the updating cycle proposed in the GASP, in order to link together the implementation of global, regional and State-level initiatives.

### 3. CONCLUSION

3.1 The Dominican Republic supports the GASP, not solely as an instrument to ensure harmonization and coordination of efforts undertaken to implement and monitor initiatives for the enhancement of the global safety oversight system, but also in its role as a frame of reference for State-level strategic planning.

3.2 Given the high expectations placed on the GASP, and the challenges faced by States related to the implementation of measures that are radically different in nature from those that ICAO traditionally makes available to States, the implementation strategy should take account of all the points raised in this Working Paper. It should also adopt a different approach to the assistance provided by ICAO, with personnel training included therein as an ICAO priority.

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