



International Civil Aviation Organization

**WORKING PAPER**

A39-WP/320  
EX/118  
1/9/16  
**(Information paper)**  
English only

**ASSEMBLY — 39TH SESSION**

**EXECUTIVE COMMITTEE**

**Agenda Item 27: Increasing the efficiency and effectiveness of ICAO**

**VOLUME OF ICAO CORRESPONDENCE**

(Presented by the United Arab Emirates)

**EXECUTIVE SUMMARY**

This paper discusses the technical and economic challenges faced by states due to the need to deal with the large number of correspondences sent by ICAO and its regional bodies on regular basis.

The implementation of the recommendations enclosed in this paper should help ICAO and States in managing the changes in a more realistic manner.

<i>Strategic Objectives:</i>	This information paper relates to the Safety Strategic Objective.
<i>Financial implications:</i>	
<i>References:</i>	

## 1. INTRODUCTION

1.1 ICAO Member States have a mandate to ensure safe and secure development of civil aviation. This requires proper allocation of resources to the areas of real concern, careful examination, thoughtful implementation of plans, consultation with stakeholders and equally important, a methodical approach in promulgation of rules and stability to allow for the changes to sink-in

1.2 From a safety perspective, most of the States oversight authorities technical staff are dedicated to CE 6 through 8. Some countries spare some resources to manage CE 1 through 5 whilst others use the same resources to look after all of the CEs. It is of course acknowledged that ICAO is supporting the RSOO's and regional offices are involved to help with resource problems but this is still not enough at this stage.

## 2. DISCUSSION

2.1 States are facing difficulties in hiring, and retaining technical personnel and this has been brought to the attention of ICAO on several occasions. ICAO, of course, puts a great emphasis on the effective implementation of the critical elements. This can be achieved to a great deal if States have the time and space to handle all of the changes that are being sent on a constant basis.

2.2 The idea of effective implementation though, can be defeated due to the States being overwhelmed by the number of ICAO correspondences they receive.

2.3 This will eventually lead to many correspondences being either ignored or not scrutinized properly by the States.

2.4 From the period of 1 Jan 2016 until July 2016, the UAE GCAA has received 75 letters related to safety from ICAO as well as the regional office (at a min. rate of 3 per week). A lot of these letters are expansive and need a lot of time to respond to and act upon.

2.5 Not to mention of course the letters that require gathering of data and long questionnaires so that ICAO can perform some analysis required by certain committees and bodies. In quite a few cases, not all of states provide this data because of the resource problems. This undermines the data collection efforts, hence, the accuracy of the final outcome may be questionable.

2.6 In addition, not all states indicate agreement/ disagreement with state letters. There could be cases where States with well-established aviation industry and oversight authority indicate disagreement with a proposed amendment to an annex for example.

2.7 However, due to the fact that ICAO considers Nil response from States (which normally suffer from lack of resource issues) as an agreement to the amendment proposal, the aggregate acceptance score among States may offset the disagreeing states scores purely due to some States not responding to SL. This affects states playing key roles in the global aviation arena. The more the letters sent, the less the attention paid to the letters by some member states due to resources available versus volume of letters.

2.8 We do not intend to make a statement that the letters are not important, nor that a lot of these letters are issued based on requests by States presented during high level ICAO events and the

subsequent committees that get created, but there are priorities. ICAO should put in place a mechanism and decision gates to allow for the most important correspondences to be sent to States and the others may remain in the waiting list. A simple risk assessment exercise can help in prioritizing the correspondences.

2.9 What can also help states (administratively) is if there is a provision to reply to letters (whatever the nature of these letters might be) directly through the ICAO secure portal. This can provide a certain degree of relief to the authorities.

2.10 The GCAA has an online platform which allows the industry to comment on-line against proposed rules and also to comment against State letters when it is important to have stakeholders inputs. The response rates to proposed rules has considerably increased with the on-line platform.

### 3. CONCLUSION

3.1 The Assembly is invited to take note of:

- a) the challenges faced by the States as a result of the volume of correspondences and the need for ICAO to develop an online correspondences management platform to reduce administrative burden and make it easier to analyse and generate reports concerning responses to the correspondences; and
- b) the need for ICAO to embark on an initiative for management of correspondences which keeps management of change, a core activity in order to enable States to meet their mandates in a realistic manner.

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