



ASSEMBLY — 39TH SESSION

TECHNICAL COMMISSION

Agenda Item 33: Aviation safety and air navigation monitoring and analysis

SSP PLANNING IN RELATION TO
THE INTEGRATION OF THE SSO SYSTEM AND THE CURRENT SSP FRAMEWORK

(Presented by Venezuela (Bolivarian Republic of))

EXECUTIVE SUMMARY

This working paper analyzes how SSP planning in individual States will be affected by the adoption of Amendment 1 to Annex 19 — *Safety Management*.

Action: The Assembly is invited to:

- a) note and consider the opinions in this working paper; and
- b) urge ICAO to consider how SSP planning in individual States will be affected by Amendment 1 to Annex 19, and press for initiatives to be taken in the States in every region, with efforts on the part of all the parties, to establish a common reference framework for global/regional acceptable levels of safety with which the SSPs of each State will align so that State performance is established, measured, and monitored.

<i>Strategic Objectives:</i>	This working paper relates to the Safety Strategic Objective.
<i>Financial implications:</i>	No financial implications
<i>References:</i>	2014-2016 <i>Global Aviation Safety Plan</i> (GASP; Doc 10004) Annex 19 — <i>Safety Management</i> State letter AN 8/3.1-16/16 <i>Safety Management Manual (SMM)</i> (Doc 9859)

¹ Spanish version provided by Venezuela (Bolivarian Republic of).

1. INTRODUCTION

1.1 The adoption of Amendment 1 to Annex 19, pointed out in State letter AN 8/3.1-16/16 of 4 April 2016, entails an upgrade of State safety programme (SSP) provisions integrated with the State safety oversight (SSO) system critical elements (CEs).

1.2 This amendment is based on the initiatives recommended by the Second High-Level Safety Conference (HLSC 2015) and is in line with GASP objectives.

1.3 SSO and SSP implementation has required continual industry and State participation and is aimed at moving from a prescriptive approach based on compliance to an approach based on performance. The Venezuelan experience and the experience observed in other States show that progress in SSP implementation is not homogeneous.

2. DISCUSSION

2.1 It is in States' interest to achieve SSP implementation, and ICAO, together with all the industry players, has made additions to the *Safety Management Manual (SMM)* (Doc 9859) in order to guide gradual, phased implementation using support tools such Appendix 7 to Chapter 4, *SSP Gap Analysis Checklist and Implementation Plan*.

2.2 The new audit protocol safety management-related PQs were published in November 2014. They will be applicable for States with an effective implementation (EI) level above 60% as of 1 January 2016.

2.3 In order to re-examine the initial planning involved in SSP implementation and in the analysis of the new PQs, a cross-reference of the gap analysis questions and the protocol questions was prepared, as indicated in Annex B to this working paper.

2.4 According to State letter AN 8/3.1-16/16, the Universal Safety Oversight Audit Programme (USOAP) safety management-related protocol questions (PQs), initially published in November 2014, are expected to be updated in 2017 after the publication of the fourth edition of the *Safety Management Manual (SMM)* (Doc 9859) in July 2017.

2.5 According to the amendment, the principles set out in the original version of Annex 19 were not essentially changed, but rather, restructured (see Annex A to this working paper).

3. CONCLUSIONS

3.1 It is important to consider the impact on those States, such as ours, which are in the process of implementing their SSPs. This is especially so for States with over 60% EI, bearing in mind that integration of the State safety oversight (SSO) system and the SSP framework elements is expected to have additional, mostly administrative/financial costs for States which have already established and promulgated an SSP, and considering the adaptation of legislative documents which may be necessary for States. Even higher costs are expected where multiple aviation authorities are involved in safety management activities.

3.2 However, with the provisions of Amendment 1 to Annex 19, achievement of full SSP compliance will require, in prescriptive terms, 100% effective implementation of all the PQs under the USOAP-CMA, since the eight critical elements of the SSO plus the current SSP framework will be part of the components of the SSP. If we assess an SSP from a performance perspective, States should aim to ensure that their SSPs establish and maintain the acceptable State levels of safety performance which are the most suitable and harmonized with their region.

3.3 For the purposes of SSP planning in light of this amendment, the scope of the SSP gap analysis would be expanded using the questions set out in Appendix 7 to Chapter 4 of the *Safety Management Manual (SMM)* (Doc 9859), in addition to all the PQs of all the audit protocols.

4. **RECOMMENDATION**

4.1 The Assembly is invited to note and consider the opinions in this working paper with regard to how SSP planning by States will be affected.

4.2 We recommend that ICAO and industry organizations continue their efforts to meet GASP objectives for continuous improvement of safety and for States to move from a prescriptive assessment of safety to an assessment of safety performance.

4.3 We recommend that initiatives be taken in the States of every region, with efforts on the part of all the parties, to establish a common reference framework for global/regional acceptable levels of safety with which the SSPs of every State will align so that State performance is established, measured, and monitored with a group of common State safety performance indicators, such as, for example, specific high-consequence events, compliance with SARPs through safety oversight capability (EI), the provision of information, and the like.

APPENDIX A
RESTRUCTURING OF SSP COMPONENTS AND ELEMENTS

SSP Components and Elements		
Components	Elements	
	Annex 19, Chapter 3 Appendix 1 and Attachment A	Amendment 1 to Annex 19 Chapter 3 and Appendix 1
State safety policy, objectives, and resources	1) State safety legislative framework 2) State safety responsibilities 3) Accident and incident investigation 4) Enforcement policy	1) Primary aviation legislation (CE-1) 2) Specific operating regulations (CE-2) 3) State system and functions (CE-3) 4) Qualified technical personnel (CE-4) 5) Technical guidance, tools and provision of safety-critical information (CE-5)
State safety risk management	5) Safety requirements for the service provider's SMS 6) Agreement on the service provider's safety performance	6) Licensing, certification, authorization and/or approval obligations (CE-6) 7) Safety management system obligations 8) Accident and incident investigation 9) Hazard identification and safety risk assessment 10) Management of safety risks (which includes resolution of safety issues [CE-8])
State safety assurance	7) Safety oversight 8) Safety data collection, analysis and exchange 9) Safety-data-driven targeting of oversight of areas of greater concern or need	11) Surveillance obligations (CE-7) 12) State safety performance
State safety promotion	10) Internal communication training, and dissemination of safety information 11) External communication training, and dissemination of safety information	13) Internal communication and dissemination of safety information 14) External communication and dissemination of safety information
	APPENDIX 1. State Safety Oversight System (SSOS)	APPENDIX 1. State Safety Oversight (SSO) System Critical Elements (CEs)
	ATTACHMENT A. Framework for a State Safety Programme (SSP)	

APPENDIX B
TABLE OF CROSS-REFERENCES BETWEEN APPENDIX 7 TO CHAPTER 4 (GAP ANALYSIS CHECKLIST) OF DOC 9859 AND NEW/MODIFIED AUDIT PQS

SSP Component		USOAP Audit Protocol Questions (PQs) with Reference to Doc 9859
Element	Gap Analysis Questions	
1.1	1.1.1	(CE 1) PQ 1.001 Has the State promulgated primary aviation legislation (including civil aviation acts, laws, decrees, resolutions, etc.) to enable it to address its obligations as a signatory to the Chicago Convention? The PQ does not include a reference to Doc 9859
	1.1.2	(CE 2) PQ 1009 Has the State developed means for the amendment of its specific regulations taking into consideration ICAO provisions and their amendments? The PQ does not include a reference to Doc 9859
1.2	1.2.1	(CE 3) PQ 2301 Has the State identified the placeholder organization as well as the accountable executive for the administration and coordination of the implementation and operation of the SSP? (CE 1) PQ 1016 Does the accountable executive of the State SSP have the necessary authorities and accountabilities/responsibilities required for the administration and coordination of the implementation and operation of the SSP? (CE 3) PQ 2303 Does the SSP accountable executive coordinate, as appropriate, the SSP activities of the different State regulatory and administrative organizations?
	1.2.2	There is no PQ related to 4.2.1, Element 1.2; 4.4.3 b)
	1.2.3	There is no PQ related to 4.2.1, Element 1.2; 4.4.3
	1.2.4	There is no PQ related to 4.3; 4.4.3 d)
	1.2.5	(CE 3) PQ 2052 Do the current funding mechanisms ensure the provision of the necessary resources for the implementation and maintenance of the SSP?
	1.2.6	There is no PQ related to 4.4.3 a)
	1.2.7	(CE 3) PQ 2309 Has the State defined the specific activities and responsibilities related to the management of safety that each aviation regulatory organization under the SSP is accountable for?
	1.2.8	(CE 3) PQ 2305 Does the State have a mechanism or platform for the coordination of SSP implementation and continuous monitoring activities involving relevant State regulatory and administrative organizations?
	1.2.9	(CE 3) PQ 2303 Does the SSP accountable executive coordinate, as appropriate, the SSP activities of the different State regulatory and administrative organizations?
	1.2.10	(CE 2) PQ 2310 Has the State established a State safety policy and objectives within its SSP framework?
	1.2.11	(CE 2) PQ 2310 Has the State established a State safety policy and objectives within its SSP framework?
	1.2.12	(CE 2) PQ 2313 Does the State have a periodic internal review mechanism for assurance of continuous conformance and improvement of its SSP?
	1.2.13	(CE 2) PQ2311 Has the State established a State safety policy and objectives within its SSP framework?
	1.2.14	(CE 1) PQ1020 Has the State SSP document that describes the SSP framework components and elements been completed and approved by the SSP accountable executive?

	1.2.15	(CE 1) PQ 1020 Has the State SSP document that describes the SSP framework components and elements been completed and approved by the SSP accountable executive? (CE 2) PQ 1022 Has the SSP document been communicated or made accessible to all stakeholders? (CE 5) PQ 2307 Has the State established an SSP documentation system which includes a top-level SSP document that defines and describes the SSP, together with other records, forms and SOPs associated with the implementation and operation of the SSP?
	1.2.16	(CE 5) PQ 2307 Has the State established an SSP documentation system which includes a top-level SSP document that defines and describes the SSP, together with other records, forms and SOPs associated with the implementation and operation of the SSP?
	1.2.17	(CE 3) 2313 Does the State have a periodic internal review mechanism for assurance of continuous conformance and improvement of its SSP?
1.3	1.3.1	(CE 1) 6005 Does the legislation provide for the independence of the investigation process and of the authority in charge of conducting aircraft accident and serious incident investigations?
	1.3.2	(CE 1) 6005 Does the legislation provide for the independence of the investigation process and of the authority in charge of conducting aircraft accident and serious incident investigations?
1.4	1.4.1	(CE 5) PQ 1056 Has the State addressed safety management requirements in its established enforcement policy and associated procedures?
	1.4.2	(CE 1) 1051 Does the primary aviation legislation provide for the enforcement of applicable legislation and regulations? The PQ does not include a reference to Doc 9859
	1.4.3	(CE 5) PQ 1056 1056 Has the State addressed safety management requirements in its established enforcement policy and associated procedures?
	1.4.4	(CE 5) PQ 1056 Has the State addressed safety management requirements in the established enforcement policy and related procedures?
	1.4.5	(CE 5) PQ 1056 Has the State addressed safety management requirements in the established enforcement policy and related procedures?
	1.4.6	(CE 5) PQ 1056 Has the State addressed safety management requirements in its established enforcement policy and associated procedures?
2.1	2.1.1	(CE 2) PQ3901 Has the State promulgated regulations to require approved training organizations that are exposed to safety risks related to aircraft operations during the provision of their services to implement an SMS and the SMS be made acceptable to the State(s) responsible for the organization's approval? (CE 2) PQ4501 Has the State promulgated regulations to require operators of aeroplanes or helicopters authorized to conduct international commercial air transport to implement an SMS and that the SMS be made acceptable to the State of the Operator?
	2.1.2	(CE 2) PQ 3903 Has the State established and implemented a mechanism to periodically review SMS requirements to ensure that they remain relevant and appropriate to the approved training organizations? (CE 2) PQ4503 Has the State established and implemented a mechanism to periodically review SMS requirements to ensure they remain relevant and appropriate to the applicable air operators? (CE 2) PQ 5381 Has the State established and implemented a mechanism for the periodic review of the SMS requirements to ensure they remain relevant and appropriate to the AMOs? (CE 2) PQ 7191 Has the State established and implemented a mechanism for the periodic review of the SMS requirements to ensure they remain relevant and appropriate to the ATS providers? (CE 2) PQ8501 Has the State established and implemented a mechanism for the periodic review of the SMS requirements to ensure they remain relevant and appropriate to the operators of certified aerodromes?
2.2	2.2.1	(CE 6) PQ3933 Has the State agreed with individual approved training organizations' on their respective safety performance indicators (SPIs), alert levels and target levels? (CE 6) PQ5385 Has the State agreed with individual AMOs on their respective safety performance indicators (SPIs), alert levels and target levels? (CE 6) PQ 7195 Has the State agreed with individual ATS providers on their respective safety performance indicators (SPIs), alert levels and target levels? (CE 7) PQ8509 Has the State agreed with individual operators of certified aerodromes on their respective safety performance indicators (SPIs), alert levels and target levels? (CE 5) PQ4509 Has the State established procedures for acceptance and monitoring of the applicable air operators' safety performance indicators (SPIs) and their respective alert and target levels? (CE 5) PQ5384 Has the State established procedures for acceptance and monitoring of the AMOs'

	<p>safety performance indicators and their respective alert and target levels?</p> <p>(CE 5) PQ7194 Has the State established procedures for acceptance and monitoring of ATS providers' safety performance indicators (SPI) and their respective alert and target levels?</p> <p>(CE 5) PQ 8507 Has the State established procedures for acceptance and monitoring of the safety performance indicators and the respective alert and target levels of the operators of certified aerodromes?</p>	
2.2.2	<p>(CE 6) PQ3933 Has the State agreed with individual approved training organizations' on their respective safety performance indicators (SPIs), alert levels and target levels?</p> <p>1) Verify the safety indicators, targets and alerts are:</p> <ul style="list-style-type: none"> a) a combination of high and lower- consequence SPIs, as appropriate; b) pertinent to the training organization's aviation activities; c) consistent with other approved training organizations of the same category; and d) congruent with the State's SSP aggregate safety indicators for the category. <p>2) Verify that the agreed SPIs are commensurate with the scope and complexity of the training organization's specific operational context.</p>	
2.2.3	<p>(CE 7) PQ 3768 Does the State, as part of its surveillance programme, periodically assess approved training organizations' SMS, including its hazard identification and safety risk management processes as well as its safety performance indicators (SPIs) and their relevant alert and target levels?</p> <p>(CE 7) PQ3935 Does the State periodically review the agreed safety performance indicators (SPIs) to ensure that they remain relevant and appropriate to the approved training organization?</p> <p>(CE 7) PQ 4511 Does the State periodically review the agreed safety performance indicators (SPIs) to ensure they remain relevant and appropriate to the air operator?</p> <p>(CE 7) PQ 5386 Does the State periodically review the agreed safety performance indicators (SPIs) to ensure they remain relevant and appropriate to the AMO?</p> <p>(CE 7) 7196 Does the State periodically review the agreed safety performance indicators (SPIs) to ensure they remain relevant and appropriate to the ATS provider?</p> <p>(CE 7) PQ8511 Does the State periodically review the agreed safety performance indicators (SPIs) to ensure that they remain relevant and appropriate to the operator of a certified aerodrome?</p>	
3.1	3.1.1	<p>(CE 3) 2009 Does the primary aviation legislation in the State provide a legal basis for the establishment of the civil aviation safety oversight system in the State?</p> <p>(CE 3) 2010 Has an organizational structure been established at the State level depicting the civil aviation safety oversight entities in the State and their reporting lines?</p> <p>(CE 3) 2011 Are the functions and responsibilities of each entity within the civil aviation safety oversight system clearly defined?</p> <p>The PQs do not include references to Doc 9859</p>
	3.1.2	<p>(CE 2) PQ 3901 Has the State promulgated regulations to require approved training organizations that are exposed to safety risks related to aircraft operations during the provision of their services to implement an SMS and the SMS be made acceptable to the State(s) responsible for the organization's approval?</p> <p>(CE 5) PQ 3907 Has the State established a process for the initial review and acceptance of the approved training organizations' SMS?</p> <p>(CE 5) PQ 4507 Has the State established a process for the initial review and acceptance of air operators' SMS?</p> <p>(CE 5) PQ 5383 Has the State established a process for the initial review and acceptance of AMOs' SMS?</p> <p>(CE 5) PQ 7193 Has the State established a process for the initial review and acceptance of ATS providers' SMS?</p> <p>(CE 5) PQ 8505 Has the State established a process for the initial review and acceptance of the SMS of operators of certified aerodromes?</p>

<p>3.1.3</p>	<p>(CE 5) PQ 3931 Has the State established procedures for acceptance and monitoring of its approved training organizations' safety performance indicators and their respective alert and target levels? (CE 5) PQ4509 Has the State established procedures for acceptance and monitoring of the applicable air operators' safety performance indicators (SPIs) and their respective alert and target levels? (CE 5) PQ5384 Has the State established procedures for acceptance and monitoring of the AMOs' safety performance indicators and their respective alert and target levels? (CE 5) PQ7194 Has the State established procedures for acceptance and monitoring of ATS providers' safety performance indicators (SPI) and their respective alert and target levels? (CE 5) PQ 8507 Has the State established procedures for acceptance and monitoring of the safety performance indicators and the respective alert and target levels of the operators of certified aerodromes?</p>
<p>3.1.4</p>	<p>(CE 7) PQ 3768 Does the State, as part of its surveillance programme, periodically assess approved training organizations' SMS, including its hazard identification and safety risk management processes as well as its safety performance indicators (SPIs) and their relevant alert and target levels? (CE 7) PQ 4513 Does the State, as part of its surveillance programme, periodically assess air operators' SMS, including their hazard identification and safety risk management processes and safety performance indicators (SPIs) as well as their relevant alert and target levels? (CE 7) PQ5387 Does the State, as part of its surveillance programme, periodically assess AMOs' SMS, including its hazard identification and safety risk management processes and its safety performance indicators (SPIs) and their relevant alert and target levels? (CE 7) PQ8513 Does the State, as part of its surveillance programme, periodically assess the SMS of operators of certified aerodromes, including its hazard identification and safety risk management processes and its safety performance indicators (SPIs) and their relevant alert and target levels?</p>
<p>3.1.5</p>	<p>(CE 7) PQ 3768 Does the State, as part of its surveillance programme, periodically assess approved training organizations' SMS, including its hazard identification and safety risk management processes as well as its safety performance indicators (SPIs) and their relevant alert and target levels? (CE 7) PQ 4513 Does the State, as part of its surveillance programme, periodically assess air operators' SMS, including their hazard identification and safety risk management processes and safety performance indicators (SPIs) as well as their relevant alert and target levels? (CE 7) PQ5387 Does the State, as part of its surveillance programme, periodically assess AMOs' SMS, including its hazard identification and safety risk management processes and its safety performance indicators (SPIs) and their relevant alert and target levels? (CE 7) PQ8513 Does the State, as part of its surveillance programme, periodically assess the SMS of operators of certified aerodromes, including its hazard identification and safety risk management processes and its safety performance indicators (SPIs) and their relevant alert and target levels?</p>

	3.1.6	<p>(CE 7) PQ 3768 Does the State, as part of its surveillance programme, periodically assess approved training organizations' SMS, including its hazard identification and safety risk management processes as well as its safety performance indicators (SPIs) and their relevant alert and target levels?</p> <p>(CE 7) PQ3935 Does the State periodically review the agreed safety performance indicators (SPIs) to ensure that they remain relevant and appropriate to the approved training organization?</p> <p>(CE 7) PQ 4511 Does the State periodically review the agreed safety performance indicators (SPIs) to ensure they remain relevant and appropriate to the air operator?</p> <p>(CE 7) PQ 5386 Does the State periodically review the agreed safety performance indicators (SPIs) to ensure they remain relevant and appropriate to the AMO?</p> <p>(CE 7) PQ7196 Does the State periodically review the agreed safety performance indicators (SPIs) to ensure they remain relevant and appropriate to the ATS provider?</p> <p>(CE 7) PQ8511 Does the State periodically review the agreed safety performance indicators (SPIs) to ensure that they remain relevant and appropriate to the operator of a certified aerodrome?</p>
	3.1.7	(CE 3) 2313 Does the State have a periodic internal review mechanism for assurance of continuous conformance and improvement of its SSP?
3.2	3.2.1	(CE 8) 6506 Has the State established and maintained a safety database to store data on hazards and safety risks and to facilitate the effective analysis of information on actual or potential safety deficiencies obtained, including that from its incident reporting systems, to determine any actions required for the enhancement of safety?
	3.2.2	Procedures for data exchange between the aviation authority and the investigation authority
	3.2.3	<p>(CE 8) PQ 6506 Has the State established and maintained a safety database to store data on hazards and safety risks and to facilitate the effective analysis of information on actual or potential safety deficiencies obtained, including that from its incident reporting systems, to determine any actions required for the enhancement of safety?</p> <p>(CE 8) PQ6513 Has the State established mechanisms to exchange and share safety information amongst the State's regulatory and administrative organizations and service providers, as well as with other States and industry organizations as appropriate?</p>
	3.2.4	(CE 2) PQ 2315 Has the State established an acceptable level of safety performance (ALoSP) as defined by selected safety indicators with corresponding target and alert levels?
	3.2.5	(CE 2) PQ 2315 Has the State established an acceptable level of safety performance (ALoSP) as defined by selected safety indicators with corresponding target and alert levels?
	3.2.6	(CE 2) PQ 2317 Does the State have a mechanism for periodic monitoring of the SSP safety indicators to assure that corrective or follow-up actions are taken for any undesirable trends, alert level breaches or non-achievement of improvement targets?
3.3	3.3.1	<p>(CE 5) PQ3937, PQ4455, PQ7075, PQ8417 Has the State developed procedures to prioritize inspections, audits and surveys towards those areas of greater safety concern or need?</p> <p>(CE 5) PQ5455 Has the State developed procedures to prioritize inspections, audits and surveys of AOC holders and AMOs towards those areas of greater safety concern or need?</p> <p>(CE 7) PQ3939, PQ4457, PQ 7077, PQ8419 Is the prioritization of inspections and audits based on the analysis of safety risks or quality data?</p> <p>(CE 7) PQ5457 Is the prioritization of inspections and audits of AOC holders and AMOs based on the analysis of safety risks or quality data?</p>
	3.3.2	<p>(CE 5) PQ3937, PQ4455, PQ7075, PQ8417 Has the State developed procedures to prioritize inspections, audits and surveys towards those areas of greater safety concern or need?</p> <p>(CE 5) PQ5455 Has the State developed procedures to prioritize inspections, audits and surveys of AOC holders and AMOs towards those areas of greater safety concern or need?</p> <p>(CE 7) PQ3939, PQ4457, PQ 7077, PQ8419 Is the prioritization of inspections and audits based on</p>

		the analysis of safety risks or quality data? (CE 7) PQ5457 Is the prioritization of inspections and audits of AOC holders and AMOs based on the analysis of safety risks or quality data?
4.1	4.1.1	(CE 4) PQ 2107 Does the State ensure that personnel involved in SSP implementation and its operation have undergone appropriate SSP training or familiarization? See PEL 3.116; OPS 4.052; AIR 5048; AIR 5486; AIG 6124; ANS 7066; and AGA 8052
	4.1.2	(CE 4) PQ 2107 Does the State ensure that personnel involved in SSP implementation and its operation have undergone appropriate SSP training or familiarization? (CE 4) PQ3116 Have the personnel licensing staff who are involved in SSP implementation and its operation completed appropriate SSP and SMS training, as applicable? (CE 4) PQ 4052 Have the personnel of the aircraft operations organization who are involved in SSP implementation and its operation completed appropriate SSP and SMS training, as applicable? (CE 4) PQ 5048 Have the personnel of the AID who are involved in SSP implementation and its operation completed appropriate SSP and SMS training, as applicable? (CE 4) PQ 6124 Have the personnel of the investigation authority who are involved in SSP implementation and its operation completed appropriate SSP and SMS training, as applicable? (CE 4) PQ7066 Have the ATS inspectorate staff who are involved in SSP implementation and its operation completed appropriate SSP and SMS training, as applicable? (CE 4) PQ8052 Have the personnel of the aerodrome regulatory authority who are involved in SSP implementation and its operation completed appropriate SSP and SMS training, as applicable?
	4.1.3	(CE 5) PQ 2319 Has the State developed a means to communicate safety-related information, including the State SSP documentation and safety/enforcement policies and procedures, to State regulatory and administrative organizations involved in the SSP?
	4.1.4	(CE 8) 6513 Has the State established mechanisms to exchange and share safety information amongst the State's regulatory and administrative organizations and service providers, as well as with other States and industry organizations as appropriate?
4.2	4.2.1	(CE 5) PQ 2321 Does the State communicate and disseminate safety information with and among its service providers? (CE 5) PQ 3905 Has the State developed guidance material on the implementation of SMS for its approved training organizations? (CE 5) PQ 4505 Has the State developed guidance material on the implementation of SMS for its air operators? (CE 5) PQ5382 Has the State developed guidance material on the implementation of SMS for its AMOs? (CE 5) PQ7192 Has the State developed guidance material on the implementation of SMS for its ATS providers? (CE 5) PQ8503 Has the State developed guidance material on the implementation of SMS for its operators of certified aerodromes?
	4.2.2	(CE 5) PQ 2321 Does the State communicate and disseminate safety information with and among its service providers?
	4.2.3	(CE 5) PQ 2321 Does the State communicate and disseminate safety information with and among its service providers?
	4.2.4	(CE 5) PQ 2321 Does the State communicate and disseminate safety information with and among its service providers?