



**DIRECTORS GENERAL OF CIVIL AVIATION CONFERENCE
ON A GLOBAL STRATEGY FOR AVIATION SAFETY**

Montréal, 20 to 22 March 2006

Theme 2: Improving aviation safety

Topic 2.1: Transparency and sharing of safety information

TRANSPARENCY AND SHARING OF SAFETY INFORMATION

(Presented by the Seychelles)

SUMMARY

This paper is presented to the Directors General of Civil Aviation Conference on a Global Strategy for Aviation Safety, regarding factors that have to be considered prior to increasing the sharing of USOAP information. It discusses foreseeable consequences of such proposals and recommends steps that may be taken to mitigate such negative consequences. It considers the level of maturity of the USOAP system at present as well as the reliability of information being derived. It also examines ways that the quality of information provided may be improved to provide more reliable information that may be utilized in the proper context.

1. INTRODUCTION

1.1 Working paper 5 addressing Theme 2, Topic 2.1 proposes a means to improving safety through further sharing and transparency of Universal Safety Oversight Audit Programme (USOAP) information. Paragraphs 2.10 to 2.14 of the working paper are aimed at providing USOAP information through the ICAO public web site as well as a secure access to the Audit Findings and Differences Database (AFDD) with a view to increasing transparency between States as well as between all stakeholders with a vested interest in aviation.

1.2 The objective of the *Safety Oversight Audit Manual* (ICAO Doc 9735) is to promote global aviation safety through auditing Contracting States, on a regular basis, to determine the status of States' implementation of safety oversight and relevant ICAO Standards and Recommended Practices (SARPs), associated procedures, guidance material and safety related practices.

1.3 As such, the proposal is well within the objectives set. Whilst not discounting the fact that this may have such potential, a few areas have to be examined prior to such a decision in order that the results provide as far as possible a realistic and accurate reflection that is indicative of a State's safety oversight capability.

2. DISCUSSION

2.1 The maturity USOAP

2.1.1 It should be recognized that USOAP is a relatively new system. It was conceived around 1998 and since then has had experience amounting to five years in actual auditing to the protocol. During this time, through the experience of the first cycle of audits, it was apparent that a different approach was required and a comprehensive integrated approach was deemed necessary. This has yet to be fully tried and tested. As with any audit system, it should be noted that it is going through the normal cycle or stages of change towards better meeting its objective.

2.1.2 Serious consideration has to be given as to whether it is at a stage of maturity where the results can be utilized by an expanded audience also considering the purposes it could be used for. One example of this is the emerging move to utilize USOAP information as a basis of "black listing". Any shortfalls or deficiencies in the audit system could have severe consequences and serious economic ramifications on States as well as increased pressure on ICAO to ensure the information is as reliable as possible.

2.1.3 The first cycle of the USOAP has not only served to highlight the extent of lack of implementation among States but also as an impetus for change and remedial action. This is clearly seen through the results of the follow-up audit which shows much improvement at a global and regional level. It is recommended that the proposal be postponed until the completion of the next audit cycle under the auspices of the comprehensive safety oversight audit system.

2.2 Reliability of the USOAP information

2.2.1 At the end of the first cycle of USOAP concerns have already been raised at the ability of USOAP to provide a reliable and as accurate as possible picture of the actual capability of a State in the provision of safety oversight through the eight critical elements of a safety system.

2.2.2 USOAP is based in its approach and philosophy on an ISO 9000 concept which does not necessarily ensure quality but rather examines systems and processes at a very high level. It assumes that with standardized and documented systems and processes quality will be attained. Experience obtained at the attempted incorporation of such standards in some fields of aviation such as maintenance soon showed the inherent limitations. As such the USOAP results can be categorized more as quantitative rather than a qualitative representation of safety oversight in a State. Evidence of this can easily be seen in the review of USOAP audit reports of some African States with poor safety records which indicate capability or implementation of oversight well above that of leading reputable regulatory authorities. Evidence can also be seen in audit findings raised by some States' audit of organizations in other States such as foreign maintenance organizations. Again the USOAP reports do not reflect the actual quality of oversight being provided.

2.2.3 It is suggested that the audit system be further enhanced by examining a sample of oversight activities to form a better balanced assessment of documented processes and the actual quality of oversight activity.

2.3 Integrated approach to provision of USOAP information

2.3.1 A review of the proposal indicates that the provision of the final audit reports as well as a secure access to AFDD may not be sufficient to provide the complete representation of a State's oversight capability and furthermore to allow it to be assessed in the right context. In many cases some audit findings are closed or resolved with minimum delay and others over a longer period but nevertheless prior to the next audit cycle. Failure to consider the State's action plans and revised resolution status may well result in the report findings being out of date.

2.3.2 It is recommended that the provision of information is additionally complemented by the provision of the State's regularly updated action plans and an updated resolution status document compiled by ICAO. This may be achieved by State's updated action plans supplemented by evidence of reforms that may allow ICAO to reconcile a resolution document.

2.3.3 The above would be applicable to findings related to more procedural and systems issues. In as far as compliance to the ICAO Annexes, it is recommended that ICAO considers a more user friendly electronic approach to updating compliance by States. This may be achieved by a cut down version of the AFDD software system circulated to all States that may link via the internet to the ICAO server for the timely updates. This would be a more efficient approach as opposed to the paper compliance check list currently in use. This would also facilitate the incorporation of new SARPs in the checklist and consideration by States. In this case, the master database could simply be modified and an alert message could draw attention and require attention to the new requirement. Consideration should also be given for the same software to have more project management orientated tools that would allow States to efficiently manage compliance with the SARPs and oversight in general in addition to reporting. State Aviation Activity Questionnaires (SAAQs) could also be included within the same system which would again provide ICAO and other States an accurate and up-to-date level of activity at any point in time.

3. CONCLUSION

3.1 The aim of this paper is to present some issues that will have to be considered prior to adopting proposals for the increased sharing of USOAP and AFDD information to a wider audience. The USOAP is a relatively new audit system that is still being enhanced. The release of USOAP information may have severe consequences on some States and in view that much improvement has already been seen through the first audit cycle, it is recommended that the proposal be postponed to after the completion of the next comprehensive safety oversight audit. It is also recommended that State Action Plans also be provided to supplement the USOAP final reports and AFDD in order that other States are afforded the opportunity to consider items that have already been resolved and intentions on other items still open. A recommendation is also made to move towards more direct electronic communication with ICAO on AFDD and SAAQ by the provision of a scaled down and modified version of the AFDD software to States enhanced by more project management orientated tools. States may then post the latest data at scheduled periods.