International Civil Aviation Organization

WORKING PAPER

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ASSEMBLY — 42ND SESSION

TECHNICAL COMMISSION

Agenda Item 24: Aviation Safety and Air Navigation Priority Initiatives

TECHNICAL LIMITATIONS FOR THE IMPLEMENTATION OF THE GLOBAL AERONAUTICAL DISTRESS AND SAFETY SYSTEM (GADSS)

(Presented by the Dominican Republic)

EXECUTIVE SUMMARY

Annex 6 — *Operation of Aircraft,* Part I — *International Commercial Air Transport — Aeroplanes* Chapter 6, 6.18.1 requires that, as of 1 January 2025, all aeroplanes with a certified take-off mass exceeding 27,000 kg, and for which an individual certificate of airworthiness was first issued on or after 1 January 2024, must automatically transmit position information at least once per minute when in distress, in accordance with Appendix 9.

Many developing Member States depend on the airworthiness certification processes of the State of Design, including the recognition of Class I and Class II aeronautical products and the modifications incorporated therein. This reliance has introduced substantial administrative and regulatory burdens, as numerous exemption requests are being submitted by operators that are unable to comply with the new provisions due to technical limitations.

The impossibility of meeting the standard in practice has led to widespread issuance of individual regulatory exemptions, creating inconsistencies in implementation and an undue administrative load on both civil aviation authorities and air operators. The fragmentation in compliance with this standard, risks undermining the harmonized global implementation of ICAO Standards and Recommended Practices (SARPs).

To address this issue, it is proposed that Chapter 6, Section 6.18.1 of Annex 6, Part I be amended to incorporate a transitional provision, allowing States and operators sufficient time to overcome current technical limitations. This measure would support a more harmonized and coordinated approach, mitigating the burden on authorities and facilitating global compliance without compromising safety objectives.

Strategic Goals:	This working paper relates to *Every Flight is Safe and Secure.*

[1] English and Spanish versions provided by the Dominican Republic.

Financial implications:	The activities mentioned in this working paper will be subject to the availability of resources from the 2026-2028 Regular Budget, as well as extrabudgetary and/or voluntary contributions.
References:	Annex 6 — *Aircraft Operation, Part I — International Commercial Air Transport – Aircraft* Chapter 6, 6.18.1.

1. INTRODUCTION

1.1 Annex 6 — *Operation of Aircraft,* Part I — *International Commercial Air Transport – Aeroplanes* Chapter 6, Section 6.18.1 provides that from 1 January 2025, all aeroplanes with a certified take-off mass of more than 27,000 kg, first issued with an individual airworthiness certificate on or after 1 January 2024, shall autonomously transmit information enabling the operator to determine its position at least once per minute when the aircraft is in distress, in accordance with Appendix 9.

2. DISCUSSION

2.1 The difficulties in meeting this requirement have been noted by various manufacturers, who are still in the process of developing, certifying, and implementing the required technology. This directly affects States that rely on these processes to incorporate the necessary technical modifications into their fleets.

2.2 Member States that promptly adopted this requirement in our national regulations acted on the assumption that manufacturers had the technical and logistical capacity to comply. However, it has become clear that the technology is still in the development and certification phase by the States of Design. Likewise, the timescales associated with component production, the supply chain, and aircraft installation must be considered.

2.3 ICAO has urged Member States to reduce bureaucracy and facilitate, within their national regulatory framework, the effective implementation of safety-oriented measures. In the case of the Global Aeronautical Distress and Safety System (GADSS) regulatory framework, ICAO Member States that are not States of Design typically accept Type Certificates or Supplementary Type Certificates issued by States of Design.

3. CONCLUSION

3.1 Given the current industry constraints in complying with the requirement of Annex 6, Part I, Chapter 6, Section 6.18.1, States are facing a high burden of individual exemption requests. Given that this situation affects multiple regions, ICAO may consider adopting an amendment to Annex 6 regarding the applicable implementation date for Standards and Recommended Practices (SARPs) related to the location of an aeroplane in distress, based on the information provided by the industry to date.

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