



ASSEMBLY — 42ND SESSION

EXECUTIVE COMMITTEE

Agenda Item 22: Other items to be considered under the Executive Committee

REVIEW AND ANALYSIS OF APPLICABLE INTERNATIONAL STANDARDS TO ENSURE RELEVANCE AND IMPROVE IMPLEMENTATION

(Presented by the United States)

EXECUTIVE SUMMARY

ICAO is empowered by Article 37 — *Adoption of international standards and procedures* of the *Convention on International Civil Aviation* (Doc 7300) (the Chicago Convention) to adopt and amend Standards and Recommended Practices (SARPs) and Procedures for Air Navigation Services (PANS) for the purpose of obtaining the highest practicable degree of uniformity in aviation worldwide. The SARPs and PANS now encompass thousands of provisions. The increasing volume and complexity of the SARPs and PANS presents challenges for ICAO to manage and States to effectively implement. This paper recommends a prioritized review and analysis of the ICAO Standards to identify those provisions which are obsolete, duplicative or redundant, unnecessarily prescriptive, or otherwise inconsistent with Article 37 of the Convention.

Action: The Assembly is invited to:

- direct ICAO to conduct a prioritized review and analysis of ICAO Standards applicable on or before 31 December 2025 to identify provisions which are obsolete, redundant, unnecessarily prescriptive, or otherwise inconsistent with the intended scope and objectives of Article 37 of the Convention;
- direct ICAO to implement the results of the analysis into the ICAO Standards and the audit programmes reliant on the affected standards;
- direct ICAO to conduct a cost study to understand the full financial impact of conducting the review and the work to implement the recommended changes; and
- encourage States and other donors to make voluntary financial contributions, as regular budget funds may not be utilized, to resource the actions in a) and b), above.

<i>Strategic Goals:</i>	This working paper relates to all Strategic Goals.
<i>Financial implications:</i>	<i>Impact for States</i> Fully implementing the recommendations in this paper would decrease the burden on States to fulfil their obligations related to implementation of international standards. <i>Impact for ICAO</i> Implementing the recommendations will also decrease the future financial and personnel resources that ICAO requires for the administration of its standards and the standards development process. An initial expenditure of resources will be necessary to ensure the appropriate actions are taken; however, it should normalize with the completion and

	management of these efforts and may be offset with voluntary contributions from Member States.
<i>References:</i>	A42-WP/4, Implementation of the ICAO CMA Safety and Security Programmes A42-WP/5, Evolution of the USOAP CMA AN-Conf/14-WP/121 A41-WP/325 AN-Conf/13-WP/297, Evolution of SARPs Drafting and Implementation A39-WP/205, Assisting Implementation through the Application of Impact Assessments and Implementation Task Lists During the Standards-Making Process A39-WP/86, Enhancing the Implementation of International Aviation Provisions A39-WP/37, Implementation of ICAO SARPS

1. INTRODUCTION

1.1 ICAO is empowered by Article 37 — *Adoption of international standards and procedures* of the *Chicago Convention on International Civil Aviation* (Doc 7300) to adopt and amend international standards and recommended practices and procedures for the purpose of obtaining the highest practicable degree of uniformity in aviation worldwide.

1.2 Today, ICAO manages over 12 000 SARPs across the 19 Annexes and six PANS to the Chicago Convention.¹

1.3 Articles 37 and 38 — *Departures from international standards and procedures* of the Chicago Convention also obligate Member States to bring their own regulations or practices into full accord with the international standards and to notify ICAO of any differences between their own practices and those established by international standards.

1.4 The standards form the principal basis for the Protocol Questions (PQs) comprising ICAO's safety and security oversight and compliance audit programmes, which focus on State capability in providing safety and security oversight, safety and security performance, and implementation of the relevant international standards.

2. DISCUSSION

2.1 The ICAO work programme related to Standards development, which is carried out principally by the technical panels and the ICAO Secretariat under the guidance of the responsible Commission or Committee, is primarily forward focused on expanding and modifying the SARPs and PANS to reflect the continual evolution and innovation of the aviation sector.

2.2 The growing volume and complexity of the SARPs is a byproduct of this ongoing work program, which presents challenges for ICAO to manage and States to effectively implement. These challenges are evident in the overall high number of notified differences and recent downward trend observed in effective implementation scores produced by the ICAO audit programmes.

¹ (International Civil Aviation Organization, How ICAO Develops Standards, n.d., <https://www.icao.int/about-icao/AirNavigationCommission/Pages/how-icao-develops-standards.aspx>)

2.3 Recent ICAO Council discussions² have acknowledged the challenges for ICAO to ensure that panels complete assigned job cards and noted that it is becoming increasingly difficult to keep guidance material aligned with the continually expanding and changing SARPs.

2.4 This paper recommends a prioritized review and analysis of the ICAO Standards to identify those provisions, which are obsolete, duplicative or redundant, unnecessarily prescriptive, or otherwise inconsistent with Article 37 of the Convention.

2.5 The objectives of undertaking this review and analysis include harmonizing the envisioned scope and objectives for the international standards, streamlining the number of standards while ensuring they remain relevant to current regulatory approaches, strengthening the ICAO audit programmes, and reducing the workload on ICAO and the technical groups responsible for developing the Standards and administering related ICAO programmes.

2.6 The project proposed in this paper should be carried out by a consultant contracted by ICAO. The existing workload for the ICAO Secretariat and technical groups (which are comprised of experts provided by States, international organizations, and industry) prohibit them from pursuing an effort of this scale, whereas a consultant could leverage machine learning and other artificial intelligence capabilities to execute a comprehensive review and analysis.

2.7 The project should include all standards applicable on or before 31 December 2025, which would not disrupt the ongoing work programme. Recognizing the significant resource commitment needed to thoroughly execute this project, the scope should be limited to international standards as the recommended practices, PANS, and guidance material are complementary to the expectation that States implement the standards in their national aviation systems. For the same reason, the standards provide the principal basis for the PQs against which States are evaluated pursuant to the ICAO audit programmes.

2.8 The project should deliver results to the ICAO Council to determine and assign follow-on actions (e.g., to amend Annexes and remove obsolete Standards) in consultation with the relevant Commission/Committee(s). ICAO should provide regular progress updates to States and the international aviation community at appropriate venues, such as by correspondence and during divisional meetings or Assembly sessions.

2.9 To maximize timely delivery of actionable results to the ICAO Council and, if needed, enable mid-stream adjustments to methodology, the review and analysis of the standards within the scope of the project should be conducted following a phased and prioritized approach.

2.10 For purposes of developing the phased and prioritized approach, those Annexes published in multiple parts or volumes could be distributed across the phases of the project wherein each part or volume is addressed separately according to the following parameters:

2.11 Phase 1 could address Annexes containing only international standards and no recommended practices.

2.11.1 Phase 2 could address Annexes with the most standards included in the audit program PQs, such as by identifying the three Annexes not already covered in Phase 1 having the most (i.e., highest/greatest) exposure across the audit programmes.

2.11.2 Phase 3 could address Annexes not covered in Phases 1-2, having been most amended (i.e., highest number of amendments) and/or having the highest frequency of amendment.

² 234th Session of the ICAO Council, March 19, 2025 ([JSC 234-1/ATC234-2](#)) refers

2.11.3 Phase 4 could address Annex 1 if not already covered by Phases 1-3. Due to its length, complexity, and the absence of a dedicated technical panel for a lengthy period prior to establishment of the Personnel Training and Licensing Panel, Annex 1 may warrant a dedicated focus.

2.11.4 Phase 5 could address any remaining Annexes, which would also be those with the least exposure across the audit programme PQs.

2.12 The goal should be to complete the review and analysis prior to the 43rd Session of the Assembly in 2028, recognizing that full implementation of the results may require additional time.

2.13 Regardless of the methodology applied to conduct the phased and prioritized review and analysis, effective implementation of results will require transparency from ICAO in communicating progress and diligence in establishing realistic applicability dates for any changes made to the applicable standards (A41-WP/325 refers).

2.14 Finally, as a first step, ICAO should conduct a comprehensive cost study to thoroughly assess the financial impact of this review. In addition, the cost study should consider future costs of implementing the recommendations.

3. CONCLUSION

3.1 ICAO continues to provide a critical forum to develop harmonized International standards for international civil aviation, and these standards can and should continue to evolve to meet current and future needs.

3.2 The extensive ongoing ICAO Standards development programme is prohibitive to conducting an overall review of existing standards with the aim of ensuring a consistent scope and approach and streamlining where feasible.

3.3 The project proposed in this paper could improve the content of the ICAO Standards, reduce the number of differences notified to ICAO, and improve the output from the ICAO audit programmes. This project is complementary to ongoing activities related to the continued improvement of the audit programmes (A42-WP/4 and A42-WP/5 refer).

3.4 The Assembly is invited to refer to Actions a) through d) contained in the Executive Summary.