International Civil Aviation Organization

WORKING PAPER

ASSEMBLY — 42ND SESSION

EXECUTIVE COMMITTEE

Agenda Item 14: Audit Programmes – Continuous Monitoring Approach

A GREATER PERFORMANCE- AND RISK-BASED APPROACH TO ICAO AUDIT PROGRAMMES

(Presented by New Zealand and co-sponsored by Australia and Canada)

EXECUTIVE SUMMARY

This paper proposes holistic improvements to ICAO's Universal Safety Oversight Audit Programme (USOAP) and Universal Security Audit Programme (USAP) by considering the current prescriptive audit model against one that is more aligned with outcome-focused and risk-based methodologies. Recognizing evolving global aviation security and safety demands, as well as the need for ICAO and Member States to maximize efficiency with increasingly limited resources, this paper proposes the establishment of a technical experts group to review and recommend enhancements to both ICAO audit programmes, building upon discussions during the Fourteenth Air Navigation Conference in 2024.

This paper reflects experiences and observations made by States and aims to proactively add value to ICAO's audit programmes by building upon their existing strengths, capturing lessons learned and addressing systemic opportunities for enhancement across ICAO's audit programmes.

Action: The Assembly is invited to:

a) recognize the need for updates to ICAO's audit programmes considering the changing operational context in States, evolving aviation industry growth, new and emerging technologies, and resourcing restraints of States and ICAO;
b) form a diverse and inclusive expert group, with terms of reference provided by the Council, to report back to the Council with comprehensive recommendations for improving both the USOAP and USAP programmes;
c) support the initiative, by considering the nomination of appropriate experts, and by encouraging Member States to actively participate in the expert group;
d) consider supporting the transition of ICAO's audit methodologies toward outcome-focused and risk-based frameworks, whilst exploring the reduction of prescriptive auditing processes as appropriate; and
e) evaluate additional mechanisms suggested within this working paper to improve audit efficiency, flexibility, and effectiveness.

Strategic Goals:	This working paper relates to *Every Flight is Safe and Secure.*
Financial implications:	The ICAO activities referred to in this paper will require additional resources. One consultant to support the establishment and deliberations of the group and others may be needed to support the implementation of recommendations.

References:	Doc 10118, *Global Aviation Security Plan (GASeP)* AN-Conf/14-WP/121, *Evolution of Audit Methodologies in Response to New Aviation Technologies*

1. INTRODUCTION

1.1 The Universal Safety Oversight Audit Programme (USOAP) and Universal Security Audit Programme (USAP) have historically provided valuable insights into States' compliance with ICAO Standards and Recommended Practices (SARPs). While these programmes effectively support global aviation safety and security, new and emerging evolutions in the aviation environment underscore the need for more dynamic, adaptive, and cost-effective audit methodologies, both for States and for ICAO.

1.2 This paper is not driven by recent audit outcomes but is based on observations from a range of States that have identified both challenges and opportunities within the current system, including those who have recently supported the creation of a new USAP Task Force under the Aviation Security Panel, and who recognize the value in further enhancing the existing strengths of the different audit programmes. These insights reflect States' experiences and are offered in the spirit of improving audit effectiveness while reinforcing the strong audit foundations already established by ICAO.

1.3 Drawing on the recent paper presented by New Zealand and co-sponsored by Australia, Canada, and the United Kingdom at the Fourteenth Air Navigation Conference (AN-Conf/14-WP/121, *Evolution of Audit Methodologies in Response to New Aviation Technologies*), this paper proposes integrating risk-based and outcome-focused enhancements into ICAO's audit methodologies.

1.4 Current prescriptive models restrict States' flexibility in addressing their unique operational contexts, often imposing rigid compliance requirements that may not align with specific needs or operational context, such as geographic individuality and threat/risk levels. There is also an opportunity to provide additional clarity on what outcomes the USOAP and USAP are intended to measure, their objectives, and how they should be used to serve the needs of States.

1.5 Furthermore, the evolving aviation landscape, including the integration of new domains like remotely piloted aircraft systems (RPAS), cybersecurity, and performance-based oversight (e.g., the State Safety Programme Implementation Assessment (SSPIA) integration into USOAP from January 2026), necessitates a shift towards outcome-focused and performance-based oversight and ICAO audit models that are adaptable while still ensuring a global baseline and standardized approach, as appropriate.

2. DISCUSSION

2.1 Incorporating an outcome-focused risk-based methodology

2.1.1 Adopting an increased risk-based audit approach would allow ICAO to better allocate its resources more effectively from a planning and scheduling perspective by focusing on higher-risk areas. This strategy would enhance both the impact and efficiency of audits, ensuring that critical issues are identified and addressed more promptly, while areas identified as lower risk may warrant extended intervals or reduced scope between assessments. It is understood that any shift to risk-based and outcome-focused audits will necessitate certain baseline aspects to both audit programmes maintaining an element of the current prescriptive approach.

2.1.2 One of the key areas for discussion is the fundamental differences in the approaches between ICAO's current audit programmes with respect to the level of flexibility and availability of documented alternative means of demonstrating compliance. This discrepancy creates inconsistencies in how States, who may organize their audit teams to encompass both security and safety, engage with audit processes, and offers an opportunity for a more harmonized and flexible approach across both programmes.

2.1.3 It is recognised and acknowledged that some States will prefer to retain a more prescriptive audit approach, and that this may be appropriate for many national regulatory systems. A well-designed audit programme should be capable of accommodating both approaches using a structured methodology that is tailored to the needs of the State undergoing audit.

2.1.4 Another area for consideration is ICAO's practice of auditing against Recommended Practices and guidance under USOAP, rather than limiting audits to established Standards, that form the basis of expected State compliance. Unlike Standards, guidance material does not undergo the same level of scrutiny or formal adoption, yet currently, States are still evaluated against it in the same way as Standards. While it is understood that this practice is currently permissible, it risks diminishing the value of officially adopted Standards and the extensive effort invested by Panels and the Air Navigation Commission in their development and designation. A clearer distinction between mandatory Standards and non-obligatory Recommended Practices, and guidance, such as those seen in USAP audits, could enhance the value and consistency of safety audit outcomes.

2.2 **Proposed establishment of an expert group and additional enhancement recommendations**

2.2.1 In exploring options to advance this work, consideration could be given to the establishment of a dedicated and inclusive expert group composed of technical, risk management and regulatory experts from Member States and industry associations. Key priorities of the expert group would include developing improved risk assessment models for ICAO's audit programmes, identifying best practices, such as those submitted through the Global Aviation Security Plan (GASeP), for risk-based oversight, and streamlining and modernizing existing audit processes. The expert group should also explore whether an enhanced data-driven approach to audit scope and focus, allowing the level of effort and scrutiny to be tailored across audit areas based on available risk data. By shifting towards a more flexible, innovative and risk-based approach, ICAO can improve audit effectiveness while maintaining high standards of safety and security compliance.

2.2.2 The expert group should carefully evaluate the results of the 2025 trial of ICAO's approach to incorporating State Safety Programme (SSP) and safety management system (SMS) assessments into the USOAP to determine whether it accurately measures the State's capability in these areas. This will be an important part of the ongoing audit programme and presents a good starting point for moving towards a more holistic outcome-focused approach in the safety realm.

2.2.3 The composition of the expert group will be critical to its success, and to this end it should encompass a broad range of experts including risk management and regulatory specialists that may not necessarily have traditional aviation domain expertise. By drawing from a diverse range of perspectives, ICAO will be well positioned to ensure that audit frameworks remain relevant and aligned with real-world practices. Additionally, developing scalable and flexible audit models would allow the system to adapt to varying State capacities and emerging risks, making oversight more inclusive and effective across different contexts.

2.2.4 Improving auditor training is equally critical to maintaining the quality and consistency of audits. Well-trained auditors are better equipped to apply risk-based principles, assess complex operational environments, and provide constructive, tailored feedback. Streamlining and prioritising post-audit corrective action plans would further enhance the system's adaptability by reducing administrative burdens and enabling quicker implementation of improvements.

2.2.5 Given ICAO's limited resources, the expert group could also assess the financial and technical feasibility of proposed audit programme changes to ensure they are practical and sustainable whilst highlight the resourcing benefits of a risk-based approach, which would focus efforts where they are most needed, such as reducing audit burdens, streamlining processes, and improving overall oversight efficiency and effectiveness.

3. **CONCLUSION**

3.1 While ICAO's audit programmes continue to serve as a cornerstone of global aviation safety and security oversight, the growing complexity and evolving dynamics of the aviation sector, especially with the integration of new and emerging technologies, necessitate more flexible, cost-effective, risk--based, and outcome-focused methodologies. This reality is especially timely given the upcoming SSPIA integration into USOAP in 2026.

3.2 This paper is tabled in a constructive and future-focused spirit, grounded in practical experience from States, and is not in response to any recent audit findings. We believe the existing separation between USOAP and USAP remains valuable, and we do not propose merging the two programmes. Rather, our intent is to preserve their strengths while identifying and enhancing specific areas — particularly those where a more outcome-focused and performance-based approach may be warranted.

3.3 By addressing the areas focused on in this working paper, the proposed expert group can drive meaningful improvements in audit effectiveness, ensuring a more adaptive and outcome-focused approach to safety and security oversight.

3.4 The Assembly is invited to support this initiative by requesting ICAO to establish an inclusive expert-led group, supported by Member States, to assess and recommend targeted improvements to both USOAP and USAP methodologies.

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