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ASSEMBLY — 42ND SESSION

TECHNICAL COMMISSION

Agenda Item 25: Other issues to be considered by the Technical Commission

IMPLEMENTATION OF NEW MANDATES IN AIRCRAFT OPERATION

REVISION NO. 1

(Presented by International Air Transport Association (IATA))

EXECUTIVE SUMMARY

The safe and reliable operation of the commercial aviation fleet is constantly improved by implementing new aircraft and equipment capabilities as well as procedural novelties to operationalize such capabilities.

The corresponding ICAO Standards and Recommended Practices (SARPs) and their timeline of Adopted – Effective – Applicable dates are essential to ensuring a globally harmonized implementation by States of the respective mandates regarding aircraft equipage and operation.

Establishing such a timeline, and particularly the viability of the applicability date of the SARPs, is fundamentally connected to the aviation industry and aviation operators' readiness to implement the mandates which require adequate resources and capacities (including supply chain related ones).

The implementation process of ICAO SARPs generated mandates such as aircraft equipage for Global Aeronautical Distress and Safety System – Autonomous Distress Tracking (GADSS-ADT), and aircraft equipage for Runway Overrun Awareness and Alerting System (ROAAS). Another example is the transition from Aircraft Classification Number/Pavement Classification Number (ACN/PCN) system to Aircraft Classification Rating/Pavement Classification Rating (ACR/PCR) system.

These are all recent cases proving that the effectiveness of ICAO efforts to validate the feasibility of SARP implementation timeline and ensure its globally harmonized rollout by States must be improved in view of securing all aviation stakeholders' ability to comply as well as creating a robust mechanism by which the aviation industry dynamics can be taken into account over the years which ensures proper timing between SARPs' adoption, effective and applicability dates.

Action: The Assembly is invited to:

- a) acknowledge that service providers hold the final responsibility for compliance and consequently, are the most exposed stakeholders to variabilities in the execution of implementation chain tasks; and

¹ English, Arabic, Chinese, French, Russian and Spanish versions provided by IATA.

b) recommend that ICAO establish a mechanism by which mandates that are SARPs generated have the applicability date established in a realistic timeline. Proper monitoring should also be included to allow for flexibility in face of global disruptions such as pandemics.	
<i>Strategic Goals:</i>	This working paper relates to the Strategic Goals <i>Every Flight is Safe and Secure</i> ; and <i>Aviation delivers Seamless, Accessible, and Reliable Mobility for All</i> .
<i>Financial implications:</i>	It is not expected that there will be significant financial implications to ICAO, given this work can be developed by the existing working bodies. IATA is ready to contribute to the development of the proposed mechanism.
<i>References:</i>	Assembly Resolution A41- 23: Increasing the efficiency and effectiveness of ICAO.

1. INTRODUCTION

1.1 The aircraft design, certification, production and operation are by nature heavily regulated areas; design and certification of commercial aircraft is a process extended over a minimum of 5-10-year period and often reaching a 15-year milestone, production of an aircraft type/model/variant expands typically over 25-30 years post certification and so does the life expectancy of an individual aircraft after its Entry into Service (EIS). There are timeline exceptions for production line termination and aircraft permanent withdrawal from service, but their occurrence is not changing the average pattern mentioned.

1.2 With such long-time life cycle of the aircraft asset, the governing aviation regulation changes lead often to mandating modifications that affect aircraft line-fit, forward-fit and, sometimes, retrofit.

1.3 Amendment 40-A, was partially revised by Amendment 44, which was partially revised by Amendment 48 to Annex 6 — *Operation of Aircraft*, Part I — *International Commercial Air Transport — Aeroplanes*, regarding the requirement that all aeroplanes of a maximum certificated take-off mass of over 27 000 kg for which the individual certificate of airworthiness is first issued on or after 1 January 2024, shall autonomously transmit information from which a position can be determined by the operator at least once every minute, when in distress (GADSS-ADT).

1.4 Amendment 47 to Annex 6, Part I addresses, inter alia, the equipage of aircraft with Runway Overrun Awareness and Alerting System (ROAAS) and operational credits; turbine-engine aeroplanes of a maximum certificated take-off mass in excess of 5 700 kg, for which the individual certificate of airworthiness is first issued on or after 1 January 2026, shall be equipped with ROAAS equipment.

1.5 Amendment 15 to Annex 14 — *Aerodromes*, Volume I — *Aerodrome Design and Operations* , addresses the introduction of aircraft classification rating- pavement classification rating (ACR-PCR); this method, replacing the aircraft classification number- pavement classification number (ACN-PCN) one has been effective since July 2020 and has become fully applicable since November 2024, with all States having to transition to the new methodology and all airports having to publish their PCRs.

2. DISCUSSION

2.1 The repeated revisions via amendments mentioned in point 1.3 of this paper required a series of discussions between ICAO, ICCAIA and IATA, various OEMs, AIRP, FLTOPSP, States and ANC in order to find a compromise which represents a challenging mixture of forward and retro fit elements; additionally, compliance with the SARP is not integrally achieved and several States have implemented exemptions which resulted in delay of the implementation.

2.2 Consultation between IATA and ICCAIA, with repeated involvement of their respectively represented communities, indicated the impossibility of meeting the mandates mentioned in a consistent manner across the aviation ecosystem within the specified timeline.

2.3 The de-facto non-compliance status is not only concerning already past deadlines, as applicable per points 1.3 and 1.5, but could also be reliably estimated for the future deadline applicable per point 1.4.

2.4 In general, and as exemplified ensuing cases 1.3, 1.4 and 1.5, an applicability date was established in the confidence that necessary equipment and resources would be available for full implementation. In some cases, a proper analysis of supply chain, maturity of technology and other factors would have established a more realistic timeline for implementation. The absence of such considerations resulted in non-compliance by a significant part, and sometimes a majority of the aviation industry. This led to States acting in an uncoordinated regulatory effort to find acceptable solutions avoiding bringing to a halt the operation of airlines. This resulted in significant regulator and industry resources invested in such efforts. This could be avoided by an adequate globally applicable regulatory framework/mechanism which ICAO could consider implementing.

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