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RASG-PA ASAP INITIATIVE

*Presented to: RASG-PA/15 Plenary
By: RASG-PA ASAP Working Group
March 2026
Ciudad de Mexico, Mexico*



Pan-American Safety Reality (2024)

- **The Regional Gap:** The Pan-American accident rate is ~3.3 per million departures, which is roughly 25% higher than the global average of 2.56.
- **Impact on Lives:** The region accounts for 23% of global fatalities (68 deaths) in 2024.
- **Call to Action:** Current reactive methods are insufficient; **we need proactive visibility.**
 - How do we do this?



Why ASAP? Why RASG-PA?

- The needs
 - Proactive Safety Culture
 - Uncover Hidden Risks
 - Non-Punitive Reporting
 - Accident Prevention
 - Collaborative Problem Solving
 - Supports SSP and SMS Requirements

Goal

Get ahead of the accident curve by empowering people to speak up, share safety concerns & continuously improve operations through transparency and collaboration

RASG-PA's Goal

Leverage safety intelligence from ASAPs to identify regional safety risks



The Case for ASAP in Pan America: A Reporting Gap

- **Reporting Problem:** Accident and events are preceded by *minor errors that go unreported* due to fear of retribution.
- **Narrative Intelligence:** Voluntary Safety Reporting based in Just Culture allows for capturing the "**why**" behind the error, not just the final result.
- **MOR's Limitations:** Dependability on mandatory reports (MOR) misses the weak signals. MORs capture final outcomes or serious incidents, usually missing the narrative context of weak signals (precursors)





ASAP is Just Culture But What is it?

- **Definition:** An environment where the *reporting of honest errors* is encouraged but *accountability* is maintained
- **Trust as Infrastructure:** Without legal data protection, the flow of safety information stops
- **Goal:** Move from a culture of "**blame**" to a culture of "**systemic learning**"



ASAP's *“Line in the Sand”*

- **Protected Errors:** Slips, lapses, and unintended deviations from SOPs.
- **Excluded Behaviors:** The program does not protect willful misconduct, gross negligence, or criminal acts.
- **Balance:** Ensures the safety of the reporter without compromising the State's enforcement authority.



What is RASG-PA's Response?

- Established the RASG-PA Aviation Safety Action Program (ASAP) Working Group
- **Collaboration:** Co-led by industry and authority experts (FAA and Aeroméxico).
- Mission: Standardize implementation guides so States and Operators do not have to start from scratch.





RASG-PA ASAP Roadmap

- **Initiated a Pilot Project:** To validate the model with candidate a State, their operator and employee group
- **Regional Guidance:** Developed an **implementation guidance** and an **adaptable MOU**.
- **Long-Term Vision:** Share de-identified safety trends to prevent accidents at a continental level.





ASAP Implementation Guidance

1. **Stakeholder Engagement**
 - Discussions among CAA, air carrier operators, labor unions.
2. **Readiness Assessment**
 - Legal feasibility for non-punitive, confidential reporting
 - Air carrier operator's willingness and resources to implement the program
3. **MOU**
 - Air carrier operator, CAA & labor union
4. **Event Review Committee**
 - Air carrier operator management, CAA, labor union
5. **Report Processing Protections**
 - Report Acceptance
 - Confidentiality and Legal Protections
6. **Training and Capacity Building**
7. **Data Collection and Analysis**
 - Corrective Action Tracking
 - Trend and systemic issue identification and tracking
 - Air carrier operator provide periodic reports to CAA summarizing key findings and safety issue trends
8. **Evaluation & Continuous Improvement**
9. **Promotion and Cultural Integration**
10. **Alignment with RASG-PA**
 - Participate in regional data-sharing efforts



Event Review Committee

- **Governance:** Comprised of the Regulator, the Operator, and the Employee Group.
- **Consensus:** All corrective measures are decided by mutual agreement, ensuring solutions are technical rather than punitive.
- **Closed-Loop:** Every report generates an action (training, manual updates) to close the risk gap.





Benefits for the States

- **Proactive Oversight:** State obtains data that would never arrive via mandatory channels
- **Cost Reduction:** Preventing a single fatal accident justifies the program investment
- **State's Next Step:** Review national legal frameworks to enable safety data protection





Benefits for the Airlines

- **Increased Access to Safety Intelligence:** Increased visibility into near-misses and unsafe practices
- **Tripartite Legal Shield:** ASAP is governed by a formal MoU. Reports accepted by the ERC are protected
- **Increased Operational Efficiency:** Gain a “close-loop” system where reports lead directly to targeted training and policy updates





ASAP Implementation Example

- **Success Case:** Mexico and Aeromexico
- **Legal Instrument:** Successful implementation via Mexico AFAC's *Advisory Circular CA SA-064.1/19*
- **Results:** Formalization of the program through tripartite agreements.
 - Technical integration of voluntary reporting within the SMS.
 - Clear definition of processes for managing confidential data.



Top 3 Concerns with ASAP

Concern	Just Culture Answer
"Is this a get-out-of-jail-free card?"	No. It is an information-for-safety exchange that excludes reckless behavior.
"Who decides what is an error?"	A tripartite committee (Regulator, Operator, Union) must reach a consensus.
"How do we know it works?"	Reduction in Recurrence Mitigation Implementation Rate Reporting Volume and Diversity



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What about an *ASAP sans* the CAA?



Category	Pros (The "Internal Win")	Cons (The "External Risk")	Impact on Safety Culture
Trust & Psychological Safety	Eliminates the fear of company discipline; fosters a "we're in this together" mindset between labor and management.	Does not address the "Fear of the State"; employees remain legally exposed to the regulator.	Fragile High-Trust: Trust is high within the "family," but the threat of an outside "police force" remains a constant shadow.
Data Quality & Narrative	Captures "unobtainable" intelligence about internal procedural workarounds and human factors.	Data cannot be fully leveraged for national safety trends; reports may be self-censored regarding serious regulatory breaches.	Localized Transparency: The organization gets a clear picture of its own errors, but the industry-wide "Big Picture" remains blurry.
Speed of Remediation	Agility: The ERC can implement changes to manuals or training immediately without waiting for regulatory approval.	Narrow Scope: Fixes are limited to what the airline controls; it cannot fix faulty ATC procedures or vague national regulations.	Empowerment: Employees see their reports lead to real changes quickly, which reinforces the habit of reporting.
Legal & Administrative	Simple to implement; no legislative changes or complex MOUs with the government required.	No Legal Protection: Reports are not protected from subpoenas or certificate action; "Double Jeopardy" is a constant threat.	High Vulnerability: One high-profile incident followed by a CAA enforcement action can destroy the program's credibility overnight.
Regulatory Relationship	Avoids "Fishing Expeditions" by the regulator into granular, self-reported data.	Maintains an Adversarial Relationship ; the regulator continues to use punitive methods because they lack the data to modernize.	Stagnation: The safety ecosystem remains in a "Catch-22"—the CAA won't modernize without data, and the airline won't give data without protection.



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But What About SMS VSR?



Critical Differences: SMS VSR vs Just Culture VSR (ASAP)

Area	Standard SMS VSR	ASAP (Aviation Safety Action Program)
Governance	Unilateral (Operator only).	Tripartite (Regulator, Operator, and Union/Employee Group) - ERC
Legal Protection	Limited to internal company policy.	Administrative Immunity from CAA/Regulator enforcement actions.
Data Analysis	Operator's Safety Department only.	Event Review Committee (ERC) via tripartite consensus.
Confidentiality	Internal; at the company's discretion.	Statutory & De-identified via an independent data custodian.
Legal Basis	Operator's SMS Manual.	Memorandum of Understanding (MOU) and state legislative foundation.



Decisional Matrix

Honest Error (Systemic Issue)	Reckless/Willful (Individual - No Protection)	Event Review Committee (ERC)
Slips, Lapses, Honest Mistakes	Gross Negligence (Foreseeable Risk)	Tripartite Consensus <i>(Regulator, Operator, Union)</i>
Unintentional Deviation from SOP	Willful Misconduct (Intentional Rule Break)	Reviews All Reports
Self-Disclosure (Timely)	Criminal Activity (Illegal Acts)	Applies MOU Guidelines



The Added Value of ASAP vs SMS VSR: Proactive Feedback Loop



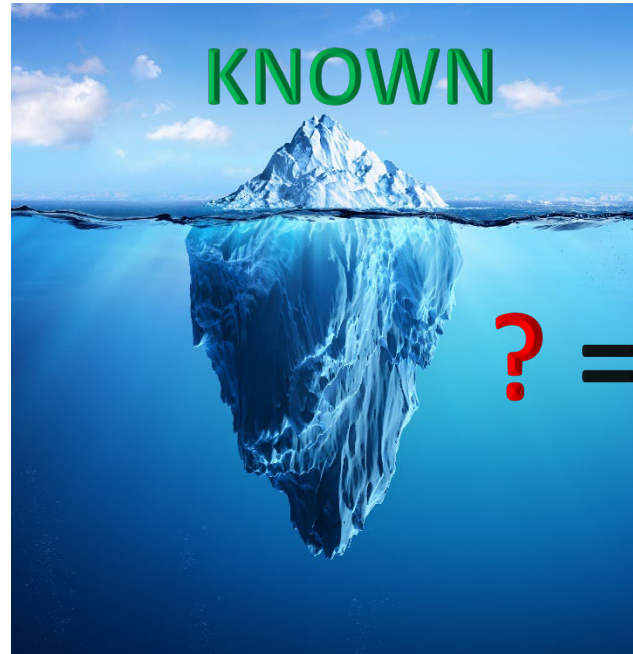
- Unlike standard SMS reports that often fall into a "black hole" with no response, **ASAP guarantees a closed-loop process**
- **Employee Report:** Captures the **narrative context and contributing factors** that mandatory reports miss.
- **ERC Analysis (Tripartite):** Regulator, Operator, and Union analyze the event by **consensus** to find the root cause
- **Corrective Action:** Real changes are implemented in training, manuals, or equipment.
- **Immunity & Safety:** The employee is shielded from State administrative sanctions for the reported error.
- **Incentivized Self-Disclosure & Visibility:** ASAP provides a legal shield that incentivizes employees to **self-disclose** honest non-compliances and "weak signals," transforming previously unknown safety issues into actionable intelligence for both States and operators.
- **Regional Intelligence:** De-identified data helps **mitigate risks** across the entire Pan-American region



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Two Cases: No Just Culture vs Just Culture - ER

No Just Culture

- **Action:** *Nurse is fired*
- **Investigation:** *Stops at the “who” - focus on “human error”*
- **Results:** *Nurse loses license. Admin sends memo “Be more careful or you will be next”*
- **Safety Impact: Negative** – *Other nurses don’t report and trap is still set for the next person*

Just Culture

- **Action:** *Nurse is temporary reassigned to non-clinical duties.*
- **Investigation:** *ERC reviews the event and identifies objective issues*
- **Result:**
 - *Nurse receives coaching/remedial training*
 - *Medications are moved to a separate locked box.*
- **Systemic Mitigation:** *Staff feel safe reporting errors. Hospital identifies precursor and fixes it*



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- Aeromexico's ASAP