



**Forty First Regional Aviation Safety Group — Pan America Executive Steering Committee Meeting
(RASG-PA ESC/41)**

Mexico City, Mexico, 2 to 3 September 2026

Agenda Item 4: Pan America Regional Aviation Safety Team (PA-RAST) Projects and Activities

**JUST CULTURE VOLUNTARY SAFETY REPORTING AND THE STATE SAFETY PROGRAMME:
CONVERGENCE WITH USOAP CMA ASSESSMENT AND THE GASP FATALITY-REDUCTION GOAL**

(Presented by the Secretariat)

EXECUTIVE SUMMARY

This paper, first presented to APRAST/25 under the PA-RAST/APRAST Collaborative Initiative, addresses a recurring concern in the Pan-American Region that some States treat preparation for USOAP Continuous Monitoring Approach (CMA) activities and the implementation of just culture-based Voluntary Safety Reporting Programmes (VSRPs) as competing priorities. The paper presents the documented convergence between the State Safety Programme (SSP) infrastructure that USOAP CMA assesses from 1 August 2026 under Electronic Bulletin EB 2026/4, the State-level architecture established under ICAO Annex 19 that enables just culture-based VSRPs, and the fatality-reduction goal of the ICAO Global Aviation Safety Plan (GASP). A single State investment in that infrastructure produces three documented returns.

Action:	The Meeting is invited to acknowledge, endorse and promote as presented in Section 4.
Strategic Goals 2026-2050:	• Every Flight is Safe and Secure
References:	• ICAO Annex 19 — Safety Management • ICAO Doc 10004 — Global Aviation Safety Plan (GASP), 2026–2028 Edition • ICAO Doc 9734 — Safety Oversight Manual, Part A • ICAO Doc 9735 — Continuous Monitoring Manual (USOAP CMA) • ICAO Doc 9859 — Safety Management Manual, Fourth Edition • ICAO Electronic Bulletin EB 2026/4 (30 January 2026) • A42-WP/259 — Positive Safety Culture; Doc 10222, Report of the Technical Commission (42nd Session of the Assembly) • Assembly Resolution A42-6 — ICAO global planning for safety and air navigation • APRAST/24–WP/08 and APRAST/25–WP/09; APRAST/25 Report of the Meeting • RASG-PA ESC/40 — WP/03 — Aviation Safety Action Programme Initiative for the Pan America Region • NACC Regional Aviation Safety Plan • AFAC Advisory Circular CA SA-064.1/19 (12 December 2019)

	• U.S. FAA Order 8900.1, Volume 11, Chapter 2 — Voluntary Safety Programs; U.S. FAA Advisory Circular AC 120-66
--	---

1. Introduction

1.1 The RASG-PA Aviation Safety Action Programme (ASAP) Initiative promotes the establishment of just culture-based Voluntary Safety Reporting Programmes (VSRPs) in the Pan-American Region, under the strategy adopted by ESC/40. A recurring concern has emerged in the PA-RAST's outreach with States: some perceive preparation for Universal Safety Oversight Audit Programme (USOAP) Continuous Monitoring Approach (CMA) activities and the implementation of just culture-based VSRPs as competing investments, and deprioritize the latter on the assumption that it does not contribute to the State's USOAP performance.

1.2 The purpose of this paper is to present the documented convergence between (a) the State infrastructure that enables just culture-based VSRPs, (b) the State Safety Programme (SSP) elements that USOAP CMA assesses from 1 August 2026 under Electronic Bulletin (EB) 2026/4, and (c) the fatality-reduction goal of the ICAO Global Aviation Safety Plan (GASP). The three frameworks are described at **Appendix A**.

1.3 This paper was first presented to the Twenty-Fifth Meeting of the Asia-Pacific Regional Aviation Safety Team (APRAST/25, Bangkok, June 2026) under the PA-RAST/APRAST Collaborative Initiative, as a companion to APRAST/24-WP/08. It is presented to this Committee in its Pan-American context, with the actions in Section 4 addressed to the Region.

2. Discussion

2.1 The three frameworks and their common dependency

2.1.1 **Appendix A** describes three frameworks: the GASP fatality-reduction goal, pursued through the SSP and the mitigation of the Global High-Risk Categories of Occurrences; the USOAP CMA measurement of State safety oversight capability, which from 1 August 2026 produces a dedicated SSP Effective Implementation (EI) score under EB 2026/4; and the Annex 19 architecture through which just culture-based VSRPs operate, giving the State governed access — through its participation in the Event Review Committee — to precursor-level and sole-source safety intelligence that mandatory reporting and surveillance cannot produce.

2.1.2 These frameworks share a common dependency. The State-level enabling infrastructure required for just culture-based VSRPs — primary legislation protecting safety information, regulations enabling non-punitive voluntary reporting, the safety data collection and processing system framework, and the protections established under Annex 19, Appendix 3 — is the same State-level infrastructure assessed under Annex 19 and reflected in the SSP EI from 1 August 2026.

2.2 The convergence: a single State investment, three documented returns

2.2.1 A single State investment in that infrastructure therefore produces three documented returns, illustrated at **Appendix D**:

- a) **Effective implementation under the SSP EI assessment.** The Annex 19 elements covering State legislation, regulations, the SDCPS framework and its protections, and the establishment of voluntary safety reporting form part of the SSP assessed under USOAP CMA from 1 August 2026.
- b) **Access to safety intelligence not otherwise available.** Just culture-based VSRPs give the State governed visibility, through its participation in the Event Review Committee, into precursor-level and sole-source events not available through mandatory occurrence reporting or surveillance.
- c) **Contribution to the GASP fatality-reduction goal.** Identifying precursors before they become accidents is the operational mechanism through which fatality risk is reduced; the documented evidence for this return, drawn from ICAO and State sources, is set out at **Appendix B**.

2.2.2 The three returns are not additive options but different views of the same underlying capability, because all three depend on the same State-level infrastructure. Building it is necessary for all three; it is not by itself sufficient for the second and third, which also depend on operator adoption. The limits of the convergence are stated at Appendix B.

2.3 External recognition

2.3.1 The convergence has been recognized beyond the Region, as set out at **Appendix C**. At the 42nd Session of the ICAO Assembly, the Technical Commission supported the actions proposed in A42-WP/259 (Positive Safety Culture), including the action encouraging States to foster a regulatory and social environment that enables a positive safety culture; Assembly Resolution A42-6 separately urges regional aviation safety groups to work with all stakeholders to implement regional aviation safety plans consistent with the GASP. In the Asia-Pacific, following the presentation of this paper at APRAST/25, the APRAST Organizational Working Group constituted a Safety Culture Task Force to drive this workstream into that region's safety enhancement initiatives on SSP establishment and safety data collection and processing systems. The framing was therefore found actionable by a region with no stake in its origin, and the approach adopted there has informed corresponding work now begun in the NACC Regional Aviation Safety Plan.

3. Pan-American Observations

3.1 As the PA-RAST has carried the RASG-PA ASAP Initiative forward in the Region, a recurring observation has emerged. Some States, weighing competing demands on limited civil aviation authority resources, treat preparation for USOAP CMA activities and the implementation of just culture-based VSRP infrastructure as separate and competing priorities, and defer the latter on the assumption that it does not contribute to USOAP performance. The convergence described in Section 2 indicates that this assumption is substantially overstated: the infrastructure required for just culture-based VSRPs is the same infrastructure assessed under the SSP EI from 1 August 2026, and the same infrastructure that supports the State's contribution to the GASP fatality-reduction goal. A State that defers VSRP-enabling work is, in practical terms, also deferring SSP-related work that USOAP CMA will assess.

3.2 In cases observed in the Region, operator interest preceded State enablement; the limiting factor was not industry willingness but the absence of the State-level legal and regulatory foundation. The convergence is also observable beyond a single State — Mexico established an Aviation Safety Action Programme framework through national instruments giving effect to Annex 19 Amendment 1 (see Appendix A) — and therefore follows from the structure of ICAO frameworks rather than any single State's model.

3.3 The Region has a near-term opportunity to act. The Safety Management Protocol Questions became applicable to USOAP CMA activities after 1 August 2026, and States across the Region are now preparing for assessment under the dedicated SSP EI score; promotion of the convergence during this period reaches States at the moment the argument is most actionable.

4. Suggested Actions

4.1 The Meeting is invited to:

- a) acknowledge the convergence between USOAP CMA assessment of the SSP, the State-level infrastructure enabling just culture-based VSRPs, and the GASP fatality-risk-reduction goal, as described in Section 2 and Appendix A;
- b) acknowledge Electronic Bulletin EB 2026/4 and the applicability of the Safety Management Protocol Questions to USOAP CMA activities from 1 August 2026, including the dedicated SSP Effective Implementation score;
- c) endorse the convergence framing set out in this paper as the basis on which the RASG-PA promotes State enablement of just culture-based voluntary safety reporting in the Region;
- d) encourage promotion of this framing through the RASG-PA's engagement with States, including in regional safety planning and the RASG-PA ASAP Initiative; and
- e) note the value of continued PA-RAST/APRAST collaboration on just culture-based voluntary safety reporting.

— — — — —

APPENDIX A

THE THREE FRAMEWORKS

1. Fatality risk reduction under the GASP

1.1 The purpose of the GASP is to continually reduce fatalities, and the risk of fatalities, associated with accidents, with the aspirational goal of zero fatalities in commercial operations by 2030 and beyond. The GASP identifies a series of Global High-Risk Categories of Occurrences (G-HRCs) that need to be addressed to mitigate the risk of fatalities, selected on the basis of actual fatalities, fatality risk per accident, or the number of accidents and incidents. The SSP, as established by ICAO Annex 19, is the framework through which a State manages aviation safety at the national level, and therefore the principal mechanism through which a State contributes to that goal.

2. USOAP CMA as the measurement of State safety oversight capability

2.1 The USOAP CMA measures a State's effective implementation (EI) of its safety oversight system, assessed against the eight Critical Elements defined in ICAO Annex 19, Appendix 1, with guidance in ICAO Doc 9734, Part A. The Protocol Questions are the primary instrument through which EI is measured. The GASP includes among its goals the strengthening of States' safety oversight capabilities, and USOAP CMA is ICAO's mechanism for measuring such capability. USOAP performance is therefore not an end in itself: it is the documented measurement of the State's capability to fulfil its safety oversight obligations and, through them, contribute to the GASP fatality-reduction goal. A consequence is that any State investment which strengthens both USOAP performance and the underlying capability to reduce fatality risk is a single investment producing two outcomes, not a trade-off between competing priorities.

3. The 1 August 2026 development: dedicated SSP EI under the USOAP CMA - EB 2026/4

3.1 Through Electronic Bulletin EB 2026/4 (30 January 2026), ICAO confirmed that the Safety Management Protocol Questions — comprising both the SSP and Safety Management System Protocol Questions — become applicable to all USOAP CMA activities starting after 1 August 2026. From that date, USOAP CMA activities produce a dedicated SSP EI score, as well as an EI score for each SSP component. This represents a substantive change: under the previous State Safety Programme Implementation Assessment methodology, SSP-related Protocol Questions were assessed in terms of maturity progress and did not affect a State's EI score. From 1 August 2026, the State's effective implementation of its SSP is measured through dedicated EI scoring, including the State-level elements established under Annex 19 — among them the legal and regulatory framework for voluntary safety reporting and the protection of safety data and safety information.

4. Just culture VSRPs and the State's access to safety information

4.1 Annex 19 establishes the State's responsibility to collect, protect, and analyze safety data and safety information. Chapter 5 requires States to establish both mandatory and voluntary safety reporting systems, and Appendix 3 establishes the principles for the protection of safety data, safety information and related sources from inappropriate use.

4.2 Just culture-based VSRPs operate within this framework through a deliberate architecture that separates two functions: the protection of individual report content from inappropriate use, and the State’s access to the safety intelligence that the VSRP produces. Both are essential, and the protection function is what makes the access function possible — without confidentiality, employees do not report. In the documented model represented by the U.S. ASAP, individual report content is protected from public disclosure under national legislation and regulation, and is not available to the State for enforcement purposes against the reporting employee; safety data captured by the VSRP is not integrated into the State’s SDCPS, as the protective architecture would not function if it were.

4.3 The State nonetheless gains substantive access to the safety intelligence that the VSRP produces through its participation in the Event Review Committee (ERC). The State representative on the ERC reviews individual accepted reports as they are processed, and participates in the ERC’s annual review of the programme database to determine whether corrective actions have been effective. De-identified information on events reviewed by the ERC may be used within the State for safety improvement purposes such as surveillance planning, policy development, and rulemaking.

4.4 The intelligence the State accesses through this channel includes information that would not otherwise be available to the regulator. The U.S. model defines a “sole-source” report as one for which all evidence of the event available is derived from the voluntarily submitted report itself. Sole-source events are by definition events the State would not learn of through mandatory occurrence reporting, surveillance, or any other conventional oversight mechanism. This is a structural feature that mandatory occurrence reporting cannot replicate: mandatory systems capture events of a defined severity and type; they do not capture the weaker signals, near-events, and procedural deviations that frequently sit upstream of accidents.

4.5 The architecture is not confined to a single national legal system. Mexico established an Aviation Safety Action Programme framework within its State safety architecture through national instruments — the Mexican Official Standard for SMS and AFAC Advisory Circular CA SA-064.1/19 (12 December 2019) — issued expressly to give effect to Annex 19 Amendment 1, including the safety-data protection provisions on which voluntary reporting depends. Under that framework the State participates in the operator’s Event Review Committee through designated points of contact, in explicit support of risk-based surveillance, while individual report content remains protected under national law and is not used for enforcement against the reporting employee.

— — — — —

APPENDIX B

EVIDENCE BASE AND LIMITS OF THE CONVERGENCE

1. Documented evidence for the contribution to fatality risk reduction

1.1 ICAO Doc 9859 (Safety Management Manual, Fourth Edition) addresses voluntary safety reporting as a core element of the SSP and SMS frameworks through which States and service providers identify hazards and manage risk. The U.S. Commercial Aviation Safety Team (CAST), an industry-government collaborative safety team whose work has been recognized internationally, has identified voluntary reporting programmes — including ASAP, the Flight Operational Quality Assurance (FOQA) programme, and the Air Traffic Safety Action Programme (ATSAP) — as core data sources for the data-driven safety analysis underlying its safety enhancement work.

1.2 In the United States, the regulator has documented that ASAP-type programmes are essential to identifying potential precursors to accidents and to further reducing the accident rate. Over the period during which CAST and these voluntary reporting programmes matured, the U.S. commercial aviation fatality risk decreased by 83 per cent between 1998 and 2008 — a reduction the Federal Aviation Administration attributes to CAST's work together with other actions and initiatives — and continued to decline thereafter. The 2023 Federal Aviation Administration National Airspace System Safety Review Team Report concluded that voluntary reporting programmes such as ASAP and ATSAP provide value and insight into the operation in ways not accessible through other data collection programmes.

1.3 Across these sources, the consistent position is that just culture-based voluntary reporting provides the safety intelligence — the precursor and weak-signal data — that conventional oversight mechanisms cannot, and that this intelligence is foundational to fatality risk reduction.

2. Limits of the convergence

2.1 To preserve the precision of the analysis, three limits should be stated explicitly.

2.2 First, the operator-implemented just culture-based VSRP itself is not a USOAP Protocol Question. The State does not receive USOAP credit for an operator having an ASAP. What is assessed under the SSP EI from 1 August 2026 is the State's establishment and maintenance of the SSP elements established by Annex 19 — including the legal, regulatory and protection framework that enables such programmes.

2.3 Second, just culture-based VSRPs cannot substitute for the State's other safety oversight obligations. Effective implementation of primary legislation, certification, surveillance, and resolution of safety concerns remains assessed independently under the existing Critical Elements. A VSRP-enabling architecture strengthens the SSP dimension; it does not compensate for weakness in the foundational oversight functions.

2.4 Third, the State's access to safety intelligence through VSRP channels is a function of the operator population's adoption of such programmes. A State that has built the enabling architecture realizes this benefit only to the extent that operators implement programmes within it. This dependency is a genuine limitation where operator interest is absent; it is substantially resolved where operators are already willing to participate. In either case it reinforces, rather than undermines, the case for the State to establish the infrastructure: without the State-level legal and regulatory foundation, willing operators cannot implement just culture-based VSRPs at all.

— — — — —

APPENDIX C

EXTERNAL RECOGNITION

1. Recognition at the level of the Assembly

1.1 The culture on which voluntary reporting depends was addressed at the 42nd Session of the ICAO Assembly under A42-WP/259 (Positive Safety Culture), presented by Oman, Singapore, Bolivia (Plurinational State of), the International Federation of Air Line Pilots' Associations, the International Transport Workers' Federation and the Civil Air Navigation Services Organisation, and co-sponsored by the Dominican Republic, Airports Council International, the International Federation of Air Traffic Controllers Associations, the Interstate Aviation Committee, the International Air Transport Association and the International Coordinating Council of Aerospace Industries Associations. That paper records that many occurrences go unreported because those involved fear disciplinary action by management or the regulatory authority, and that a positive safety culture promotes the voluntary, non-punitive reporting of safety risks that is essential to proactive hazard identification.

1.2 The Technical Commission of the Assembly supported the actions proposed in that paper, including the action encouraging States to foster a regulatory and social environment that enables a positive safety culture, and referred its content to the relevant expert groups. That enabling function is the same State-level function described in Section 2 of this paper; the convergence identifies, in operational terms, what that environment consists of and what returns it produces for the State that builds it.

1.3 Assembly Resolution A42-6 (ICAO global planning for safety and air navigation) urges Member States, regional safety oversight organizations, regional aviation safety groups and international organizations concerned to work with all stakeholders to implement regional aviation safety plans consistent with the GASP to continually reduce fatalities and the risk of fatalities. Promotion of the convergence in the Pan-American Region, including its reflection in regional safety planning, therefore falls squarely within the role the Assembly assigns to regional aviation safety groups.

1.4 The Assembly paper also notes that a positive safety culture finds its limits where deliberate misconduct, criminal activity or intentional recklessness is clearly established — consistent with the just culture principle that underlies the programmes described in this paper, and worth restating because the misconception that just culture confers immunity is a recurring obstacle in State-level discussions.

2. Reception in the Asia-Pacific

2.1 At APRAST/25, the Meeting noted the convergence presented in this paper and its applicability from 1 August 2026, when the Safety Management Protocol Questions apply to USOAP CMA activities and a dedicated SSP Effective Implementation score is introduced, including assessment of the State-level arrangements that support voluntary reporting. The paper was presented within a focused-discussion package on just culture and voluntary safety reporting led by the PA-RAST, in which operators and States from both regions presented their programmes.

2.2 Following that discussion, the APRAST Co-Chair (State) requested the Organizational Working Group to consider the information shared in its work. The Working Group subsequently constituted a Safety Culture Task Force, charged with driving the safety-culture and voluntary-reporting workstream into the Asia-Pacific regional safety plan's existing safety enhancement initiatives on SSP establishment (SEI 3.2.1) and safety data collection and processing systems (SEI 3.2.2), in coordination with their custodians.

2.3 Two points follow. First, the convergence framing was found actionable by a region with no stake in its origin, which supports its application beyond the Pan-American context. Second, the approach the Asia-Pacific adopted — embedding the workstream in the regional safety plan rather than running it as a standalone programme — has informed the Region's own planning, and corresponding work has begun in the NACC Regional Aviation Safety Plan.

— — — — —

APPENDIX D
CONVERGENCE SCHEMATIC

1. ICAO Annex 19 establishes the State Safety Programme, within which the State builds the legal, regulatory and cultural infrastructure that enables just culture-based Voluntary Safety Reporting Programmes — principally the framework for the protection of safety data and safety information (Annex 19, Appendix 3), a consensus-based Event Review Committee, and non-punitive reporting pathways for honest errors and procedural deviations. This single body of State-level infrastructure produces the three returns described in Section 2.2: effective implementation assessed under the dedicated SSP EI score from 1 August 2026; access to safety intelligence, including sole-source events, supporting risk-based surveillance; and contribution to the GASP fatality-reduction goal through the identification and management of accident precursors.

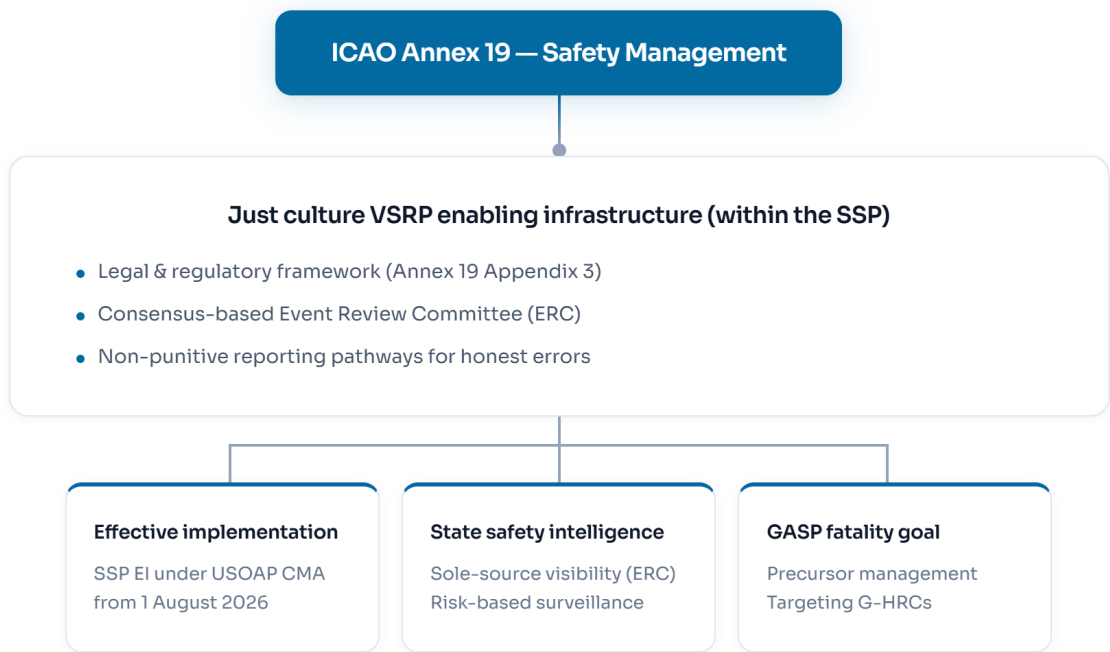


Figure D-1. The State-level just culture VSRP enabling infrastructure as a single investment yielding three documented returns.