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Agenda Item 5: Regional Safety Performance and Implementation Support

CAUSES OF LOW SSP IMPLEMENTATION IN THE SAM REGION

(Presented by Secretariat)

EXECUTIVE SUMMARY	
This Working Paper presents, in response to Conclusion RASG-PA/15/C01, the results of the analysis carried out by the SAM Regional Office on the structural causes of the low level of implementation of the State Safety Programme (SSP) in the South American Region.	
Action:	The ESC is invited to note this information and to refer the attached report to the Air Navigation Commission for its consideration and appropriate action.
Strategic Objectives:	• Every Flight Is Safe and Secure
References:	RASG-PA-15 Report

1. BACKGROUND

1.1 The requirement to establish a State Safety Programme (SSP) has been in force for approximately 15 years; nevertheless, States have faced persistent difficulties in achieving its effective implementation.

1.2 Continuous monitoring of the Global Aviation Safety Plan (GASP) targets has repeatedly identified the low level of SSP implementation as one of the main organizational challenges at the global level. This situation has been the subject of extensive discussion within RASG-PA for several years.

1.3 At its last plenary meeting, RASG-PA adopted Conclusion RASG-PA/15/C01 — "Strategy for SSP Implementation Support" — through which it tasked the Secretariat (NACC and SAM Regional Offices) to support, in consultation with States, the development of a regional strategy to identify and analyse the obstacles affecting SSP implementation, and to present a progress report with the results of this analysis, proposed solutions and an estimated timeline, to the 42nd Executive Steering Committee (ESC/42) meeting.

2. DISCUSSION

2.1 In response to this mandate, the SAM Regional Office has carried out, over the past two years, a study to understand the root causes of the low level of SSP implementation in the Region. The work included individual consultations with SSP implementation focal points from 12 of the 13 States in the Region, regional meetings and direct technical support. The details of the analysis, the evidence gathered and the full conclusions are presented in the report attached to this Working Paper.

2.2 **As a result of this work, six main causes were identified:**

- Insufficient scalability — the SSP does not adapt effectively to the actual capacity and resources of all States.
- Excessive complexity and limited implementability — technically valid concepts are difficult to translate into practical, sustainable processes.
- Risk management set aside — the capacity to identify priorities and manage risks does not sufficiently constitute the starting point of implementation.
- Prescriptive approach and excessive documentation — implementation generates a heavy documentary burden that can shift the focus from outcomes to compliance.
- Insufficient and unsustainable institutional capacity — staff turnover, loss of institutional knowledge and changes in leadership affect continuity.
- Weak engagement with industry — lack of trust and of information-protection frameworks limits the exchange needed for risk management.

2.3 The report concludes that fifteen years of limited progress must be read as evidence: if the current approach is maintained, it is unlikely that the next fifteen years will produce a different outcome.

3. SAM OFFICE RESPONSE

3.1 Having identified these difficulties, the SAM Regional Office's strategy to advance SSP implementation is focused on the following specific actions, which are already under way:

1. **SAMSP 2026–2028 —** drives the establishment of a minimum viable risk-management capacity across the States of the Region.
2. **Establishment of the RSIG —** to facilitate the exchange of best practices and lessons learned on SSP implementation among States.

3. **FENIX pilot project —** to test the concept of simplified SSP implementation over a two-year period, with the participation of three States.

4. SUGGESTED ACTION

4.1 The Meeting is invited to:

a) note the content of this working paper and of the attached report on the causes of low SSP implementation in the SAM Region; and

b) refer the report to the Air Navigation Commission for its consideration and appropriate action.

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SSP IMPLEMENTATION IN THE SAM REGION

Why progress remains limited and what needs to change?

Diagnosis of the structural causes of low implementation and a proposal to refocus efforts on effective safety risk management

CORE MESSAGE

Fifteen years of limited progress should be read as evidence. If the current approach is not producing functional safety risk management capability, repeating it for another fifteen years is unlikely to produce a different result.

Final version

August 2026

Executive summary

After approximately fifteen years of efforts to establish State Safety Programmes (SSPs), the level of implementation in the South American Region remains limited. Doc 10004 - Global Aviation Safety Plan 2026–2028 (GASP) recognizes the low level of SSP implementation worldwide as one of the five main global organizational challenges. ICAO's global analysis also indicated that fewer than 5 per cent of States using the SSP gap analysis application had self-reported reaching the level equivalent to "SSP implementation completed". [1]

The regional situation requires a deeper reading than simply stating that "States have not implemented". For approximately two years, the SAM Regional Office has maintained sustained engagement with States, including individual consultations with those responsible for SSP implementation in 12 of the 13 States in the Region, regional meetings, analysis of implementation difficulties and direct technical support. The responses show remarkably consistent patterns: excessive complexity, limited practical scalability, difficulties translating concepts into operational processes, a high documentation burden, fragile institutional capacity and persistent difficulties converting data into safety decisions. [2]

THREE CORE MESSAGES EMERGING FROM THE ANALYSIS

1. Implementation difficulties cannot be attributed solely to a lack of State resources. The consultations show that, in addition to staffing and budget constraints, recurring problems include complexity, scalability, practical clarity, documentation burden, institutional continuity and engagement with industry. The repeated appearance of the same obstacles across different States after fifteen years also requires examination of the implementation approach itself.
2. The way SSP implementation has been translated into practice has favoured the development of structures and evidence of compliance before a functional safety risk management capability. The combination of extensive guidance, multiple implementation elements and evidence-based evaluation mechanisms has led many States to concentrate effort on policies, procedures, plans and documentation even when they are not yet able to consistently identify, prioritize and manage their main safety risks.
3. ICAO does not yet have a sufficiently objective, frequent and comparable measurement to determine the actual status of SSP implementation with precision. Global information relies heavily on self-assessments, while the frequency of audits does not allow timely validation of the situation in all States. Successive changes in tools and criteria also make it difficult to compare progress over time.

The central finding of this analysis is a gap between the purpose of the SSP — to improve a State's ability to understand and manage its risks — and the way implementation is experienced in practice. In many States, effort is concentrated on establishing policies, procedures, plans, mechanisms, structures and evidence of compliance before a basic functional capability exists to identify the main national safety risks and act on them.

This situation is particularly critical in resource-constrained States. When an authority must choose between immediate certification, surveillance and resolution of safety issues, or assigning scarce staff to develop new documentary and procedural layers associated with the SSP, basic safety oversight functions reasonably tend to take priority. The SSP then begins to be perceived as an additional burden rather than as a tool for making oversight itself more effective and efficient.

The consultations also reveal an important warning signal: most of those consulted States consider substantial progress over the next five years unlikely if the current approach and conditions remain unchanged. This suggests that limited implementation is not simply a delay that time will resolve.

Continuing for the next fifteen years with essentially the same strategies applied over the previous fifteen is unlikely to produce a different result. Persistent low implementation should be treated as information: through both their results and their direct experience, States are indicating that the implementation model needs to evolve.

The response should not be to lower safety expectations or weaken Annex 19. On the contrary, it should bring the SSP back to its fundamental purpose: developing the State's capability to identify, prioritize, manage and monitor its main safety risks.

Six main causes identified

Cause	Diagnosis
1. Insufficient scalability	The SSP does not adapt effectively to the capacity, resources and actual complexity of all States.
2. Excessive complexity and limited implementability	Technically valid concepts and requirements are difficult to translate into practical, clear and sustainable processes.
3. Safety risk management relegated	The capability to identify priorities, assess risks and implement mitigations is not sufficiently established as the starting point for implementation.
4. Prescriptive approach and excessive documentation	Implementation creates a high burden of policies, procedures, plans and evidence that can shift attention from results toward compliance.
5. Insufficient and unsustainable institutional capacity	Small teams, high turnover, loss of knowledge, limited practical competencies and leadership changes undermine continuity.
6. Weak State–industry relationship	Lack of trust, the regulator–regulated power gradient and insufficient frameworks for protecting safety information limit the exchange and collaboration needed for effective State safety risk management.

1. Context, scope and evidence base

The SSP was conceived as the mechanism through which States evolve from a model based primarily on regulatory compliance toward more integrated, anticipatory and risk-based management. Doc 9859, Safety Management Manual (SMM), Fourth Edition, 2018, expressly recognizes the need to tailor implementation to the size and complexity of the aviation system and to avoid a purely prescriptive application. It also notes that, in many States, much of the required capability already exists and should be refined, realigned and strengthened. [3]

Nevertheless, the results observed in SAM show a significant distance between that intent and the practical implementation experience. Consultations repeatedly include expressions such as “a titanic task”, “too complex”, “impossible to comply with”, “too much paperwork”, “only to comply”, “we have worked on the documentation, but there is no implementation” and “we have documented it but not implemented it”. [2]

These challenges are not unique to the SAM Region. Working papers, regional reports and other analyses from different regions have documented recurring implementation difficulties related to resources, technical capability, reporting culture, indicators, protection of safety information, coordination with industry and institutional complexity. [7] The phenomenon therefore extends beyond the Region. This report focuses specifically on understanding its causes in SAM, based on patterns repeatedly observed through consultations and direct work with States over the past two years.

1.1 Evidence base

- Individual consultations with those responsible for SSP implementation in 12 of the 13 States of the SAM Region during 2025–2026, consolidated in an internal working document. [2]
- Direct technical work and support to States over approximately two years, including meetings, diagnostics and regional activities.
- Findings, goals and indicators in the GASP 2026–2028 related to SSP implementation. [1]
- Annex 19, Doc 9859 and Doc 10131 guidance used as the conceptual framework. [3][4]
- South American Region Safety Plan (SAM-SP) 2026–2028 and regional monitoring mechanisms, including the RSIG. [5]
- Design and implementation documentation for Project FÉNIX. [6]
- ICAO working papers, regional reports and other evidence documenting implementation obstacles in different regions. [7]

Interpretive criterion

Statements presented as findings describe patterns directly observed in the consultations and documents reviewed. Strategic proposals and conclusions are professional inferences derived from those findings and are presented as options to improve the effectiveness of the regional approach. The consultations are qualitative and are used to identify recurring patterns, not to estimate statistical frequencies.

2. Why SSP implementation is not progressing sufficiently in SAM?

2.1 Insufficient scalability: the SSP does not adapt effectively to available capacity and resources

Scalability is recognized in ICAO guidance. Doc 9859 states that implementation should consider the size and complexity of the aviation system and even recommends regional cooperation where national aviation activity is limited. [3] The issue identified is therefore not a conceptual absence of scalability, but its insufficient practical materialization.

In several States, the SSP is handled by extremely small teams; in some cases, by one or two people. At the same time, States are expected to develop and maintain legislation, policies, coordination structures, reporting systems, protection of safety information, risk management, indicators, SMS oversight, SDCPS, NASPs, promotion mechanisms and an increasing amount of evaluation evidence.

For an authority with substantial resources, this architecture may be manageable. For a small authority, it may exceed its absorption capacity. The observation from some States captures the issue directly: the SSP should be scalable, but in practice there is little room to scale it and its structure is perceived as insufficiently flexible. Other States describe equivalent problems from different perspectives: excessively extensive plans, difficulty overseeing numerous service providers, legislative processes that take years, or an inability to allocate specialized resources. [2]

Implication

The question should not be only how many additional resources each State needs, but what functional version of the SSP can operate sustainably across very different institutional capacities.

2.2 Excessive complexity and limited implementability: the model is difficult to translate into practical and sustainable processes

A second difficulty is independent of the amount of resources available. Numerous SSP concepts involve a high degree of technical and institutional sophistication: safety performance management, SPIs, SDCPS, protection of safety information, safety risk-based surveillance, SMS acceptance and oversight, the SSP–SMS interface, management of change and integration of information sources.

States do not necessarily question the conceptual value of these elements. The difficulty appears when answering a much more operational question: how is this implemented in practice within a civil aviation authority? The consultations repeatedly show uncertainty about how to accept SMS, define indicators, build an SDCPS, develop risk-based surveillance or interpret certain evaluation criteria. [2]

This distinction between conceptual validity and practical implementability is fundamental. A requirement may be technically sound and, at the same time, difficult to convert into a viable institutional practice. When the same difficulty is reproduced systematically across multiple States over long periods, it is no longer solely a user-capacity issue; it also becomes a signal regarding implementation design.

2.3 Safety risk management relegated: the fundamental purpose of the SSP is not sufficiently established as the starting point

Perhaps the most important finding from the consultations is that several States have developed significant parts of the SSP documentary architecture without yet developing an equivalent capability to manage risks. Some explicitly describe having documented safety risk management processes without using them operationally. Others report difficulties identifying data sources, developing indicators or converting information into national priorities. [2]

There is a paradox here. The fundamental purpose of an SSP is to enable the State to understand its risks better and make decisions to manage them. Yet the implementation logic can result in the most important capability appearing

relatively late: structures, documents, policies, mechanisms and systems are established first; only afterwards is the State expected to begin producing safety intelligence and managing risks.

This analysis proposes reversing that sequence. A State should begin developing safety risk management capability from the outset, even if initially basic and imperfect.

Questions an SSP should enable a State to answer early

- What is causing accidents and incidents in our system?
- What available information points to emerging risks?
- What are our three to five main risks?
- What are we doing to reduce them?
- Is it working?

The rest of the architecture should be developed progressively around this capability. Safety risk management should not be perceived as just another SSP component; it should be the programme's centre of gravity.

2.4 Prescriptive approach and excessive documentation: formal compliance consumes capacity that should produce safety results

There is an important difference between regulatory intent and practical effect. Doc 9859 states that implementation should not be undertaken solely in a prescriptive manner. [3] Nevertheless, State responses show that the SSP is increasingly experienced as an extensive set of policies, procedures, documents, processes and evidence.

Some States acknowledge producing NASPs or other documents primarily to meet external expectations without subsequently using them as real decision-making tools. Others report having invested considerable effort in documentation while operational implementation remains limited. [2]

Identified paradox

A system designed to help the State move from compliance toward performance can end up being implemented through a new layer of compliance.

The incorporation of the SSP as a specific audit area may increase this risk if the evaluation system privileges documentary evidence over functional capability. The more the association between SSP, documentation and audit becomes entrenched, the more difficult it will be for inspectors, managers and industry to perceive it as a tool for managing risk.

2.5 Insufficient and unsustainable institutional capacity: the issue is not only how many people are available

The lack of human resources appears repeatedly, but reducing the diagnosis to a simple need for more staff would be insufficient. States describe high personnel turnover, frequent changes of directors and SSP coordinators, loss of institutional knowledge, limited practical competencies, resistance to change and insufficient commitment at some management levels. [2]

In some cases, each change of government or leadership requires the process to be restarted almost from the beginning. The critical variable is therefore sustainable institutional capacity: the ability for knowledge, processes and decisions to survive the individuals who temporarily occupy particular positions.

SSP implementation cannot permanently depend on one or two highly motivated individuals.

2.6 Weak State–industry relationship: State safety risk management requires trust, exchange and effective collaboration

State safety risk management requires a mature relationship between the authority and service providers, capable of sustaining continuous information exchange, joint analysis of problems and industry participation in the identification and mitigation of risks.

The consultations show that this relationship is affected by several factors: lack of trust, reluctance to share information, a marked regulator–regulated power gradient, concern over the consequences of using safety information and, in some States, absent or insufficient policies and legal frameworks for the protection of safety data and safety information.

These conditions can reduce service providers' willingness to share relevant information, particularly information revealing weaknesses, errors or operational vulnerabilities. [2][7]

When the relationship develops predominantly under an enforcement and compliance logic, it becomes more difficult to create the openness required for collaborative risk management. SMS are a particularly important source of information, but only one part of the ecosystem. The Authority must combine information from surveillance, accident and incident investigation, mandatory and voluntary reporting, operators, aerodromes, ANSPs and other sources, within an environment that allows such information to be used for safety purposes. The State–industry relationship is therefore not an accessory element of SSP promotion; it is an enabling condition for building a shared picture of risk and taking effective action.

2.7 Other factors identified

- Weak reporting culture and insufficient protection/trust in the use of safety information.
- Legislative difficulties and long regulatory amendment cycles.
- Weakness or limited independence/capability of accident investigation in some States.
- Insufficient inter-agency coordination and fragmented information.
- Lack of clarity regarding the SSP cost-benefit proposition for authorities and industry.
- Limited competencies in data analysis, indicators and risk-based surveillance.
- Changes in evaluation tools and criteria affecting continuity and credibility.
- Need for greater regional exchange, harmonization and use of shared capabilities.

3. Limitations of available information on implementation

The GASP 2026–2028 recognizes that available information did not allow global SSP maturity to be adequately determined and establishes a target for States to complete the SSP self-assessment to build a baseline. [1] This can improve the available information, but it does not by itself solve the measurement problem.

3.1 Limitations of self-assessment: it primarily measures how the State perceives and reports its own situation

Self-assessment is useful as an internal diagnostic tool, but it is not a sufficiently objective method for ICAO, by itself, to determine the global or regional situation. Responses depend on interpretation, evaluator knowledge, internal standards and the availability of evidence. There is also a natural incentive to avoid portraying one's own situation in an excessively negative manner.

The results should therefore be interpreted as self-assessment of implementation, not as an independent and universally comparable measurement.

3.2 Absence of universal, objective and frequent measurement

USOAP can provide independent validation, but its frequency cannot fill the information gap quickly. A calculation prepared for this analysis, based on the intervals between USOAP audit activities in SAM States, indicates an average period of approximately twelve years between audits. [8] At that pace, many years would be required to build a sufficiently complete and current regional picture using audits alone.

There is therefore a mismatch between the available measurement cycle and the speed at which SSP progress is expected to be understood.

3.3 Continuous changes in tools and criteria make trends difficult to measure

Over recent years, tools such as the SSP Gap Analysis, implementation levels, the SSPIA and, currently, the new PQs integrated into USOAP have coexisted and evolved. The GASP 2026–2028 no longer uses SSPIA maturity levels following integration of SSP into the traditional USOAP framework. [1]

These changes make it difficult to build comparable historical series and, according to several States consulted, have generated uncertainty, rework and loss of credibility in the evaluation process. [2]

3.4 Existence, implementation and effectiveness are not equivalent

Having a policy, procedure, database or satisfactory response to a PQ does not necessarily demonstrate that the State is managing its risks better. Doc 9859 itself distinguishes between the presence and suitability of elements, the functioning of the system and effectiveness in producing the intended outcome. [3]

Any future measurement system should clearly distinguish between the presence of elements, the functioning of processes and effectiveness in safety risk management.

3.5 Measurement can induce document production instead of results

When what is evaluated consists primarily of process evidence, States have a rational incentive to produce that evidence. The risk is that resources become increasingly concentrated on what can be demonstrated during an evaluation rather than necessarily on what generates the greatest safety benefit.

The solution is not to abandon evaluation, but progressively to broaden its object: from verifying how much of the SSP has been built to verifying what safety risk management capability it is producing.

Regional need

SAM needs to complement global mechanisms with a standardized, simple and periodic regional tool. It should not become another audit, but a light assessment of critical functional capabilities, applied using common criteria and supported by regional technical validation.

4. Refocusing the effort: strengthening safety risk management with available resources

The usual response to the difficulties identified is to request more staff, more budget, more training or new platforms. In many States, those needs are real. However, a regional strategy cannot depend on every State first obtaining resources that are unlikely to become available in the short term.

Changing the question

From: “What resources does the State need to implement the entire SSP?”

To: “What is the minimum capability the State needs to start managing its risks better with the resources it already has?”

4.1 First priority: establish a minimum viable safety risk management capability

As an initial capability, every State should be able to:

1. Identify a small number of priority risks.
2. Explain what evidence supports that identification.
3. Assess those risks using a sufficiently consistent methodology.
4. Agree concrete mitigations.
5. Assign responsibility.
6. Monitor whether the actions are working.

There is no need to wait for a complete SSP before starting this cycle. A State that can perform it repeatedly already has a basic functional capability on which the rest of the programme can be built.

4.2 Use the information that already exists first

States are not starting from zero. To varying degrees, they already have information from surveillance, certification, accidents and incidents, mandatory reports, voluntary reports, investigations, SMS, operators, aerodromes, ANSPs and regional sources.

The first question should not be “how do we build a large SDCPS platform?”, but “what information do we already have and what is it telling us?”.

The technological system can then grow around the analytical need.

4.3 Radically reduce the number of priorities

Implementation plans containing dozens or hundreds of simultaneous activities create dispersion and a low probability of completion. States should concentrate on a small set of enabling capabilities.

PRIORITIZE → IMPLEMENT → VERIFY → CONSOLIDATE → EXPAND

4.4 Reorient existing capabilities before creating new structures

The SSP should not automatically imply new offices, new committees, new platforms and new processes. Transformation can begin by making better use of existing capabilities.

Existing capability	Risk-oriented use
Existing surveillance	Structured source of hazards, trends and performance information.
Management meetings	Periodic forums for risk review and decision-making.
Inspectors	Generators of structured information as well as verifiers of compliance.
Existing databases	Initial repository for integrating information before investing in complex platforms.
NASP	Expression of already-identified safety priorities, not a parallel document.

4.5 Regionalize capabilities that do not need to exist in every State

Not every State needs to develop the same level of specialization internally. Certain capabilities can be shared regionally: methodologies, tools, taxonomies, statistical analysis, indicator models, specialized training, benchmarking and trend analysis.

Regional cooperation should not be limited to exchanging experiences. It should progressively evolve into a means of multiplying scarce capabilities and reducing duplication of effort.

5. From diagnosis to action: the SAM regional response

The SAM Region has already begun to orient part of its strategy toward the problems identified. These initiatives should not be understood as independent projects or as a promotional institutional response, but as complementary components of a strategy to translate diagnosis into action.

5.1 SAM-SP 2026–2028: turning the diagnosis into a regional priority

The South American Region Safety Plan (SAM-SP) 2026–2028 expressly recognizes persistent systemic challenges and scalability limitations, particularly in small or resource-constrained States. The Plan provides for differentiated and proportional technical support, methodological guidance, assistance in interpreting requirements and specific diagnostics aimed at an SSP proportionate to the size and complexity of each State. [5]

Of particular relevance, the SAM-SP prioritizes strengthening States’ capability to identify, assess and manage their main safety risks. This orientation shifts emphasis from formal construction of the programme toward development of a functional capability that uses available information to set priorities and implement concrete mitigation actions.

This represents an important change: SSP implementation is no longer addressed exclusively as a national compliance obligation, but also as a regional challenge aimed at generating effective safety risk management capability.

5.2 RSIG: learning collectively, harmonizing and measuring better

The Regional SSP Implementation Group (RSIG) is composed of the SSP coordinators of all SAM States, making it the principal regional mechanism for direct exchange among those with practical responsibility for programme

implementation. The SAM-SP provides for regular meetings, continuous exchange and aggregated regional analysis of results. [5]

Its role can evolve beyond the exchange of experience and become a technical mechanism to:

- harmonize interpretations and criteria;
- identify common obstacles;
- test simple methodologies;
- compare results;
- develop regional tools; and
- provide periodic measurement of functional capability.

5.3 Project FÉNIX: testing a different way to implement

FÉNIX is a pilot project involving three SAM States, designed to test a different SSP implementation approach under real conditions. The project is built around two central principles: simplicity and collaboration. It seeks to reduce unnecessary complexity, leverage existing capabilities and work closely and continuously with States to resolve concrete implementation obstacles. Collaboration — between ICAO and the States and among the participating States themselves — is not an accessory feature, but one of the project's principal working mechanisms. [6]

FÉNIX also starts from a practical premise: after a prolonged period of limited implementation, the Region cannot rely solely on time to produce different results. Rather than wait through another long cycle to determine whether the same conditions generate different progress, the project is testing now, within a two-year horizon, a simpler, collaborative and results-oriented approach.

The project seeks to demonstrate that it is possible to establish a functional and effective SSP within two years, in accordance with Annex 19, through a progressive and proportionate approach centred from the outset on actual safety risk management. It applies principles such as minimum viable evidence, compliance by design, prioritization and use of existing structures and resources. [6]

Its strategic value extends beyond the three participating States. FÉNIX functions as a regional implementation laboratory intended to identify which solutions work, what can be simplified and which practices could subsequently be replicated or adapted by other States. If the results confirm this hypothesis, the lessons learned can feed back into the RSIG, the evolution of the SAM-SP and broader discussions on how to make SSP implementation genuinely viable and effective.

6. Conclusions and strategic considerations

The low level of SSP implementation after approximately fifteen years should not be interpreted simply as a delay. It is a signal.

When multiple States, over a prolonged period, face similar difficulties — complexity, insufficient practical scalability, excessive documentation, interpretation difficulties, limited safety risk management capability and a perception of weak cost-benefit — it is necessary to examine not only what States should do differently, but also what can be done differently in the implementation approach.

These challenges are not unique to the SAM Region. Working papers, regional reports and other analyses from different regions have documented recurring difficulties related to resources, technical capability, reporting culture, indicators, protection of safety information, coordination with industry and institutional complexity. [7] The available evidence therefore suggests a global issue rather than a South American particularity.

What is specific to this report is the analysis of causes in SAM. The conclusions presented here derive primarily from direct consultations with those responsible for SSP implementation in 12 of the 13 South American States and from regional work undertaken over the past two years. [2]

A conclusion that is difficult to ignore

Continuing to do essentially the same thing for another fifteen years will probably leave us in a place very similar to where we are today.

The most important risk is not only that SSP implementation continues to progress slowly. The greater risk is that authorities, inspectors and industry permanently come to perceive it as another procedural requirement to be complied with and audited, rather than as a tool to help the State make better safety decisions.

The longer that perception remains established, the more difficult it will be to reverse.

For resource-constrained States, the issue is even more critical. If they must choose between basic safety oversight activities and developing an SSP architecture perceived as additional, complex and remote from immediate operational problems, they will reasonably prioritize the former.

The SSP will stop competing with safety oversight only when it is understood as a tool that helps determine where and how that same oversight can be used more effectively.

The proposed change in approach therefore does not mean reducing requirements or lowering ambition. It means recovering the purpose.

UNDERSTAND THE RISKS → SET PRIORITIES → TAKE ACTION →

VERIFY RESULTS

Policies, structures, procedures, information systems, indicators and documentation remain necessary, but they should be built progressively to sustain this capability rather than becoming ends in themselves.

Ultimate measure of success

SSP success should be measured less by how much of the programme has been built and more by how much the State's capability to understand and control the risks that could produce the next accident has improved.

Principal sources and documentary basis

[1] ICAO. Doc 10004 - Global Aviation Safety Plan 2026–2028 (GASP).

[2] Individual consultations with SSP coordinators/persons responsible for SSP implementation in 12 SAM States, conducted during 2025–2026. Consolidated internal working document.

[3] ICAO. Doc 9859, Safety Management Manual (SMM), Fourth Edition, 2018.

[4] ICAO. Doc 10131, Manual on the Development of Regional and National Aviation Safety Plans, Third Edition, 2025.

[5] ICAO SAM. South American Region Safety Plan (SAM-SP) 2026–2028, including provisions and monitoring mechanisms for the Regional SSP Implementation Group (RSIG).

[6] Project FÉNIX. Design and implementation documentation for the pilot project with three SAM States, including its approach to simplicity, collaboration, proportionality, minimum viable evidence, compliance by design and use of existing capabilities.

[7] ICAO. Evidence documenting implementation challenges across different States and regions: AN-Conf/13-WP/116, Revision No. 1, Challenges with the Implementation of the Concept of Acceptable Level of Safety Performance (2018); A40-WP/361, Revision No. 1, Challenges in SSP Implementation in Support of Safety Management (2019); A40-WP/70, Revision No. 1, State Safety Programme Implementation with Optimization of Resources in the State of Nicaragua (2019); ICAO MID, SEIG/6 Final Report, section 5.1 Organizational Challenges/Issues (2024); AFI Plan, State Safety Programme Project, Revision 3 (2025).

[8] Calculation prepared for this analysis using the dates and intervals between USOAP audit activities conducted in States of the SAM Region.