



ORGANISATION DE L'AVIATION
CIVILE INTERNATIONALE

INTERNATIONAL CIVIL
AVIATION ORGANIZATION

Assessment of Member States' Needs and Expectations

EV/2023/02

Office of Internal Oversight

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Final report issued:

21 March 2023

ACRONYMS

ABC	Automated Border Control
ACI	Airports Council International
ADB	Administration and Services Bureau
AFCAC	African Civil Aviation Commission
AGA	Aerodromes and Ground Aids
ANB	Air Navigation Bureau
ANC	Air Navigation Commission
APAC	Asia and Pacific Regional Office
ATB	Air Transportation Bureau
CAA	Civil Aviation Authority
CANSO	Civil Air Navigation Services Organization
CASP	Cooperative Aviation Security Programme
CAPSCA	Collaborative Arrangement for the Prevention and Management of Public Health Events in Civil Aviation
C-DEC	Council Decision
CMA	USOAP Continuous Monitoring Approach
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation
COSCAP	Cooperative Development of Operational Safety and Continuing Airworthiness Programme
COVID-19	Coronavirus Disease
C-WP	Council Working Paper
DAC	OECD Development Assistance Committee
EASA	European Union Aviation Safety Agency
ESAF	East and South African Regional Office
EU	European Union
EUR/NAT	Europe and North Atlantic Regional Office
GSI	Government Safety Inspector
IATA	International Air Transport Association
ICAO	International Civil Aviation Organization
iCNSS	integrated Communication, Navigation and Surveillance and Spectrum
ISP	Implementation Support Policy
LACAC	Latin American Civil Aviation Commission
LEB	Legal Affairs and External Relations Bureau
LTAG	Long Term Aspirational Goal
MID	Middle East Regional Office
NACC	North America, Central American and Caribbean Regional Office
OECD	Organisation for Economic Co-operation and Development
OIO	Office of Internal Oversight
OLF	USOAP CMA Online Framework
OPS	Operational Safety

PANS	Procedures for Air Navigation Services
PEL	Personnel Licensing
PKD	Public Key Directory
PQ	Protocol Question
RO	Regional Office
RPAS	Remotely Piloted Aircraft Systems
RSOO	Regional Safety Oversight Organisation
SAF	Sustainable Aviation Fuels
SAM	South America Regional Office
SAP	NACC Systemic Assistance Programme
SARP	Standards and Recommended Practices
SPCP	Strategic Planning, Coordination, and Partnerships
SSP	State Safety Programme
SWOT	Strengths, Weaknesses, Opportunities and Threats
TBO	Trajectory Based Operations
TCB	Technical Cooperation Bureau
TOR	Terms of Reference
UAS	Unmanned Aircraft Systems
UN	United Nations
UNEG	United Nations Evaluation Group
USAP	Universal Security Audit Programme
USOAP	Universal Safety Oversight Audit Programme
WACAF	West and Central Africa Regional Office

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EXECUTIVE SUMMARY

1. At the request of the Secretary General, the Office of Internal Oversight (OIO) included in its 2022 Work Plan an assessment of the needs and expectations of ICAO Member States for the upcoming 2 triennia. The assessment focused on ICAO's normative, monitoring/auditing and implementation support work over the past 2 triennia to assist the organization in preparing future strategic and operating plans, programmes, and projects. The assessment which has a high-level focus, was carried out between August 2022 and March 2023.
2. The primary beneficiaries of this assessment is the ICAO Council, the Secretariat, Member States and Regional Aviation Commissions/Organizations of States. Other relevant stakeholders involved in the planning and implementation of ICAO's work (i.e., industry partners and regional organizations) may also use the findings of the assessment and recommendations, as relevant and appropriate.

Key Findings and Conclusions

3. Overall, Member States are satisfied with ICAO's standard-setting work to support their needs. States identify the harmonization of aviation rules with global applicability, transparency, consultation scope and technical expertise among Panel members as the top strengths of ICAO's normative process. However, the timeliness in the delivery and translation of the guidance material, the pace of SARP revision and the adequacy of the dates to implement SARPs are considered as major areas for improvement.
4. States positively assess ICAO's monitoring and auditing work, including the relevance and adequacy of the Universal Security Audit and Universal Safety Oversight Audit Programmes. While most States prefer keeping the audit programmes as they currently are, about one third recommends expanding the audit programmes to include additional SARPs of critical annexes, particularly Annex 9. Across all monitoring-related areas assessed, the frequency of ICAO audits is the lowest rated. Stakeholders think the small number of audits conducted per year limits ICAO's capacity to conduct proper continuous monitoring and to have a complete picture of safety and security issues on the ground.
5. Member States have a positive perception of ICAO's implementation support work. However, compared to the normative and monitoring/auditing work, implementation support is the lowest rated workstream and the area where stakeholders identify the most gaps and needs for the future. Security and Facilitation and Environmental Protection are the two areas of highest priority for ICAO to provide more implementation support. Partnering with the industry is considered as a viable opportunity to expand the quantity and quality of implementation support to the States.
6. The following cross-cutting issues are affecting ICAO's normative, monitoring/auditing and implementation support work:
 - ICAO Strategic Objectives are assessed to be relevant to meet State needs, with stakeholders considering Safety and Environmental Protection as the most relevant objectives. However, States perceive Economic Development of Air Transport and Environmental Protection as less clear and more difficult to achieve and implement. Environmental Protection is considered the Strategic Objective with the least adequate resource allocation. Of all categories assessed, the adequacy of ICAO resources to effectively implement its Strategic Objectives is rated the lowest.
 - Lack of adequate mechanisms to systematically identify, prioritize and address critical State needs, hinders the effective and efficient use of scarce financial and human resources of ICAO. Stakeholders recommend creating a well-defined Country Profile describing, among others, the context of aviation and priorities and pressing needs of a State which would help better channel limited resources across ICAO Bureaus to support Member States' Needs.

- Current organizational structure somehow limits ICAO's support to Member States and renders the alignment of standard setting, monitoring/auditing, and implementation support activities difficult. Stakeholders think that the centralization of technical expertise at ICAO Headquarters and under-resourced Regional Offices are the major barriers to organizational effectiveness. It is therefore suggested that decentralisation of duties and responsibilities through transfer of part of financial and human resources to the Regional Offices would be a good step forward to enable ICAO to meet the needs of Member States.
- There is opportunity for ICAO to embrace a more risk-based approach in supporting Member States. Stakeholders think this is a more viable approach for States to focus on the implementation, and sustainable compliance with critical priorities first, as guided by State-specific needs, resources limitations and technical capacities on the ground.
- ICAO's normative, monitoring and implementation support work have not been fully aligned over the past 2 triennia. In stakeholders' view, increasing workload of ICAO Bureaus and Regional Offices coupled with a budget that has not been increased in real terms in the past 16 years is the key contributing factor for ICAO not being able to effectively achieve its core mission and better respond to States future needs, such as greening aviation.

States Needs and Expectations for the Next 2 Triennia

7. Below is a summary of the needs and expectations identified by Member States for the next 2 triennia:

Standard Setting	<ul style="list-style-type: none"> • Identify and prioritize State needs based on regular State needs assessments. • Set criteria to prioritize SARPs ('must-have' versus 'nice-to-have') based on State needs. • Develop SARPs based on anticipated aviation needs for the next 5-10 years to reduce need to issue/amend SARPs too frequently. • Improve the participation of States not represented in Panels/ANC/Council in Panel meetings through virtual participation using available technological tools. • Improve adequacy and timeliness of guidance material, including translation into ICAO official languages. • Create categories and prioritize State Letters to better facilitate the SARPs consultation process. • Priorities areas for new/amended SARPs include UAS/RPAS, OPS, PEL and environment-related topics, including LTAG, SAF and CORSIA.
Monitoring and Auditing	<ul style="list-style-type: none"> • Increase the frequency of audits by deepening the use of a risk-based approach based on State context and needs. • Consider expanding USAP and USOAP to include additional annexes, particularly Annex 9. • Improve communication on how States are selected for audits each year. • Streamline PQs, improve OLF tool and enhance guidance material to answer PQs.
Implementation Support	<ul style="list-style-type: none"> • Prioritize areas for implementation support based on State needs, anticipated resources and funding gaps based on well-defined Country Profiles. • Decentralize support to Member States by enhancing financial and human resources of the Regional Offices and rely less on consultants. • Strengthen partnerships with the aviation industry to expand implementation support to the States, as informed by Country Profiles. • Expand resource mobilization for implementation support by including alternative funding sources, such as development banks and multilateral organisations. • Increase implementation support and training across all Strategic Objectives but primarily around Security and Facilitation (cybersecurity) Safety (SSP implementation and GSI), and Environmental Protection (SAF and decarbonization/CORSIA).

INTRODUCTION AND BACKGROUND

Introduction

8. The Assessment of Member States Needs and Expectations was included in the 2022 Work Programme of the OIO at the request of the Secretary General. The assessment examined whether ICAO's ongoing normative, auditing/monitoring and implementation support activities are aligned with the needs and expectations of Member States.
9. The findings of the assessment are to assist the organization in preparing strategic and operating plans, programmes, and projects. The assessment was conducted between August 2022 and March 2023 in accordance with the OIO Charter (C-WP/15115), the ICAO Evaluation Policy (C-DEC 203/3), and the Norms and Standards of the United Nations Evaluation Group (UNEG).

Background

10. ICAO's mission is to serve as the global forum of States for international civil aviation. ICAO develops policies and standards, undertakes compliance audits, performs studies and analyses, provides assistance and builds aviation capacity through many other activities and the cooperation of its Member States and stakeholders.¹
11. Member States engage with ICAO at various levels and through various mechanisms. The engagement at the governance and normative levels occurs through the deliberations of the ICAO Assembly and the Council.² At the normative level, engagement involves the work of the Air Navigation Commission (ANC) and the Council committees, as well as the various Panels and working groups associated with them. Through established formal communication channels (i.e., ICAO's State Letter system, Electronic Bulletins, ICAO website), ICAO facilitates meetings and events. ICAO's missions to States and Civil Aviation Authority (CAA) missions to ICAO Regional Offices (ROs) provide multiple channels of interaction.
12. Engagement with Member States at the operational level occurs directly through the ICAO Bureaus and Regional Offices. Regional Offices are the "first port of call" to Member States, ensuring coordination and promoting the timely and harmonized implementation of ICAO policies, decisions, global plans, Standards and Recommended Practices (SARPs), Procedures for Air Navigation Services (PANS) and air navigation plans. Regional Offices also provide technical guidance and assist States with implementation. The scope of work of Regional Offices has increased along with the growth of ICAO's programmes and emerging priorities.
13. To achieve its Strategic Objectives and effectively address the demands of its Member States, ICAO has conducted evaluations and assessments of State needs and expectations. Apart from the targeted needs assessments by the different Bureaus and Regional Offices, OIO conducted one independent evaluation in 2015 and the Secretariat carried out one assessment survey in 2017. The evaluation and assessment provided ICAO with useful information to make informed strategic decisions and assess the extent to which its Strategic Objectives, programmes and activities are meeting the current and future needs and expectations of Member States.

¹ <https://www.icao.int/about-icao/Council/Pages/vision-and-mission.aspx>

² Some national delegations of the Council have a permanent residence on ICAO premises.

ASSESSMENT PURPOSE AND METHODOLOGY

Assessment Purpose

14. The purpose of this assessment was to determine whether ICAO's strategic and operational plans are aligned with the needs and expectations of Member States. The assessment included a high-level analysis of the normative, monitoring/auditing and implementation support work of ICAO since 2016. It also aimed to assess the priority needs and expectations of Member States over the next 2 triennia (2023-2025 and 2026-2028 triennium planning periods).
15. The primary audience of this assessment is the ICAO Council, ANC, the Secretariat, Member States and Regional Aviation Commissions/Organizations of States. Other relevant stakeholders involved in the planning and implementation of ICAO's work (i.e., industry partners, regional coordination mechanisms, among others) may also use the findings of the assessment and recommendations, as relevant and appropriate.

Evaluation Methodology

16. The assessment used a mixed-methods approach combining quantitative and qualitative research elements to triangulate findings and provide a comprehensive understanding of Member States' current and future needs and expectations. Annex 1 provides a detailed description of the methodology.
17. The assessment was guided by ten questions based on the Organization of Economic Development (OECD) Development Assistance Committee (DAC) criteria, as presented in Annex 1.
18. The assessment adopted a participatory approach, involving key stakeholders—such as the ICAO Council, the Secretariat, Member States, and other relevant stakeholders—during the inception, data collection and report review phases.

Data Collection

19. The assessment employed the following data sources:
 - Desk review and secondary data: The assessment team reviewed a range of reports documenting ICAO's support to Member States, including Assembly Working Papers, Council Working Papers and Decisions, Regional Office and Bureau assessment, audit and evaluation reports, business plans, regional plans and reports on Member States' needs, among others.
 - Online survey: The assessment administered an online survey targeting all Member States to gather their views on ICAO's normative, monitoring/auditing and implementation support work in the past 2 triennia, as well as their priority needs and expectations for the future. A total of 158 Member States participated in the online survey (82% of all ICAO Member States). Across ICAO Regions, 25 APAC States, 15 ESAF States, 56 EUR/NAT States (55 States plus one survey completed by the European Union as a regional block), 10 MID States, 20 NACC States, 13 SAM States and 19 WACAF States participated in the survey. Annex 5 includes the survey instrument. This high level of survey participation renders the findings of this assessment as reliable and representative of the needs and expectations of Member States.
 - In-depth interviews: The assessment team interviewed 96 stakeholders through 54 semi-structured in-depth discussions. Interviews engaged Council members, the ICAO Secretary General, Member States, ICAO Bureau Directors, Regional Office (RO) Directors and their Deputies, relevant ICAO

staff, industry partners and regional organizations, among others. Annex 2 includes the list of stakeholders interviewed and Annex 5 includes the questionnaires that guided these interviews.

- **SWOT analysis:** The assessment team leveraged the information collected through the methods listed above to map ICAO's strengths, weaknesses, opportunities, and threats (SWOT) and help inform future strategy and planning. Annex 3 includes summary findings of the SWOT analysis.

Table 1. Stakeholder Consultations

Stakeholders	Consultation Method		
	In-depth Interviews	Interviewees	Online Survey (Response Rate)
Member States	26	63	158 (82%)
Council	9	10	-
ICAO Staff (HQ and ROs)	14	17	-
Industry	3	3	-
Regional groups/organizations	2	3	-
Total	54	96	158

Data Analysis and Quality Assurance

20. The assessment team conducted descriptive and content analysis to identify and validate findings. Descriptive analysis was specifically used for online survey responses and data extracted from ICAO databases and other data derived from the desk review. Content analysis was employed on the information collected through the desk review and in-depth interviews to identify major themes.
21. The information collected through primary and secondary sources was systematically analyzed and cross-referenced to arrive at findings. Similar questions were asked across stakeholders to compare responses and verify information.

Ethical Considerations

22. The assessment abided by the UNEG Ethical Guidelines for Evaluation. Special care was given to the storage of documents, interview notes and the confidentiality of the data collected for this assessment. The identity of participants has been preserved in the presentation of results, as only aggregate-level results are reported.
23. This assessment was independently carried out by the OIO, with the assistance of an independent consultant. All assessment team members declare no conflict of interest.

Limitations

24. The ICAO workstreams explored in this assessment had been separately evaluated by OIO through previous evaluations, such as the Evaluation of ICAO Standard-Setting Process (EV/2018/01) or the Evaluation of Technical Assistance to Member States (EV/2021/01). The data collection phase of this assessment may have coincided with ICAO actions to address the findings and recommendations of these previous OIO evaluations. Because stakeholders may have not been aware of these actions at

the time of this assessment, they may have raised similar concerns by assuming that ICAO has not yet addressed such issues. Wherever possible, the assessment team noted actions already taken by ICAO to address any challenges identified in this report.

FINDINGS

25. This section presents the main findings of the assessment. Annex 5 presents additional findings, including key results by ICAO Region.

ICAO's Normative Work

Finding 1: Member States highly rate ICAO's normative work over the past 2 triennia. Major areas for improvement include the timeliness and translation of guidance material accompanying the SARPs, the pace of SARP revision and the adequacy of the dates to implement SARPs.

26. Member States are generally satisfied with ICAO's normative work to support their needs. Nearly 94% of States rate ICAO's overall normative work as highly (47%) or moderately (47%) satisfactory in addressing their needs (Figure 1). Almost all States think the relevance of new or updated SARPs is high/moderate to address their needs (98%) and to keep up with current global aviation trends (95%). Across ICAO Regions, overall satisfaction levels are higher in MID, SAM and WACF States (100% each) than in APAC (92%), ESAF (93%), EUR/NAT (94%) and NACC States (83%).
27. When asked about the top strengths of ICAO's standard-setting process, most Member States mention that the process results in a harmonized set of rules with global applicability. Other strengths include transparency in the process, as it is perceived to allow a good level of participation and scrutiny. The high level of technical expertise among Panel members and the comprehensive scope of the consultation phase at different levels—including state and non-state actors—are also identified as key strengths.
28. There are notable decreases in satisfaction regarding the adequacy and timeliness of guidance material to implement new/amended SARPs. An important proportion of Member States rate the adequacy of the guidance material produced by ICAO to support the implementation of SARPs (11%) and the timeliness of such material (12%) as low. APAC, ESAF, NACC and WACAF States rate these two aspects of the guidance material lower, with low satisfaction ratings ranging from 13% in APAC to 28% in NACC. States explain that the guidance material that typically accompanies the SARPs may be received long after the SARP has been issued, delaying their capacity to readily implement SARPs. It is worth noting that these shortcomings around the timeliness of the guidance material had been identified by the Evaluation of ICAO Standard-Setting Process³ (Recommendation 5) and that the ICAO Secretariat and ANB are already taking measures to address this input.⁴
29. Surveyed States and interviewed stakeholders also note delays in getting translated guidance material as a barrier for States to timely implement SARPs.⁵ In addition to delays in receiving guidance material when SARPs are issued/amended, States say the material is often received in English first, rather than in all ICAO official languages. They think this further affects their capacity to implement SARPs, as most of the CAA teams have difficulties understanding the guidance material in English. Stakeholders recommend adapting implementation timelines to when the guidance material is going to be available,

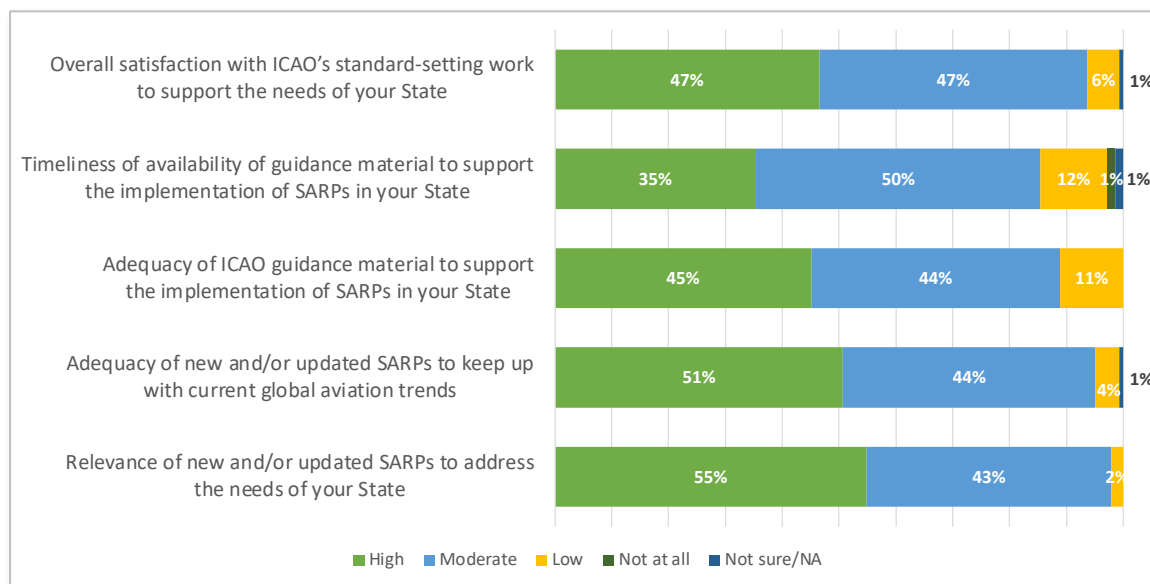
³ EV/2018/01

⁴ SARPs – Recommendation 5 – ANB Action Taken (November 2019).

⁵ A41-WP/343 EX/145; A41-WP/365 EX/163; A41-WP/426 EX/192

particularly in all official languages. This challenge had also been identified in the Evaluation of ICAO Standard-Setting Process⁶.

Figure 1. Perception of Member States of ICAO's Normative Work



Source: Survey on Needs and Expectations of Member States

30. Member States are generally satisfied with ICAO's standard-setting process. However, there are lower satisfaction levels around the pace of SARP revision. Most States (93%) rate the overall process for developing SARPs as highly (40%) or moderately (53%) satisfactory (Figure 2). By ICAO Region, satisfaction levels fluctuate importantly, observing lower ratings in MID (80%) and NACC States (83%) about the overall SARP development process. Satisfaction levels decrease to 89% when States are asked about the pace of revision of existing SARPs, particularly among SAM (85%) and ESAF States (79%).
31. Stakeholders identify the lengthy process of working with Panels as one reason for the slow pace of SARP development. Due to the voluntary nature of the work of Panel members and limited number of experts in certain areas, the process of developing or updating SARPs can be extensive, with some stakeholders indicating a timeframe of 2 years or more. Some stakeholders propose creating an accelerated process to speed up the development of standards on critical issues, as it was done during the COVID-19 emergency. Other stakeholders suggest leveraging technology (e.g., Zoom) to engage Panels more frequently and more efficiently.

"We need to be faster in writing standards than we usually do because we need to adapt quickly to become decarbonized, for example. [For this,] we need to change the way we work with the panels. We need to have new rules for when to use regular procedures and when to accelerate."

ICAO Council Member

⁶ EV/2018/01

32. Low State engagement and inadequate State representation in Panels are also challenges to SARP consultation and revision. Stakeholders indicate that most States that are not Panel members or Council/ANC members have little awareness of what and when SARPs are coming out. Coupled with limited human resources and in-house technical capacity, this constrains States' ability to actively engage in the consultation process. Others also point to the uneven geographic representation of States in Panels as a reason for States not participating more actively in the process. Stakeholders recommend leveraging technology to expand the participation of States in Panel meetings so that non-represented States and States with limited resources can be more aware of upcoming new/amended SARPs. It is important to note that this issue had been identified in the Evaluation of ICAO Standard-Setting Process⁷ (Recommendation 2) and has been addressed by ANB through modifications to the *Directives for Panels of the Air Navigation Commission* (Doc 7984).⁸
- "We have huge panels working on these standards. Then the standard goes to Member States, and we are lucky if we get 50 States to answer. When we ask why they don't engage in the review process, it comes down to resources."*
- ANC Member
33. Other stakeholders suggest having Regional Office staff join Panel meetings so that they can be more aware of upcoming new/amended SARPs and thus better support States. A Regional Office staff member comments: *"I am surprised how little information the Regional Offices have on what standards are coming. We need to know if we are expected to provide assistance. Regional Offices could organize concerns as a region to bring to the Panels. We have tried to do that, and it has been somewhat successful. Regional officers should participate in these meetings and speak with the organizations that are proposing new standards/updates. The Panels should be streamed; we have the technology for this. I know the challenges of the hybrid meetings, but we could at least try."*
34. In addition to making States more aware of upcoming standards, some stakeholders think ICAO's standard-setting process could be more future proof, meaning that the development of SARPs should consider the aviation needs of the next 5-10 years so as to reduce the number of SARPs that need to be issued/amended each year.⁹ For instance, a NACC stakeholder explains: *"Sometimes ICAO is too ambitious because some SARPs require significant regulatory changes and it can take long time for some countries to adapt national regulations. Sometimes we are too prescriptive with the standards. We need to be thinking in 5 to 10-year timelines and whether standards are future proof to make sure those changes are relevant given the effort it takes to adopt them."*
- "ICAO has to strike a balance. ICAO should have a bare minimum [set of standards] and then you can go beyond that if you want and can. States that can move faster on their own, they can go ahead. But States that need more time and resources can focus on the basic priorities first. This way ICAO can add value. Otherwise, the gap between advanced and less developed countries will continue to grow."*
35. Regarding timeliness to adopt SARPs and the dates to implement new/amended SARPs, many States report low satisfaction: 15% of States rate the adequacy of the adoption, effective and applicability dates for States to implement new/updated standards as low (Figure 2). MID (20%) and EUR/NAT States (19%) report higher levels of dissatisfaction with such dates. Similarly, 14% of States rate the timeliness to adopt new SARPs as low, with EUR/NAT (28%) and MID States (20%) also reporting higher dissatisfaction.
- Regional Organization

⁷ EV/2018/01

⁸ AN-WP/9623

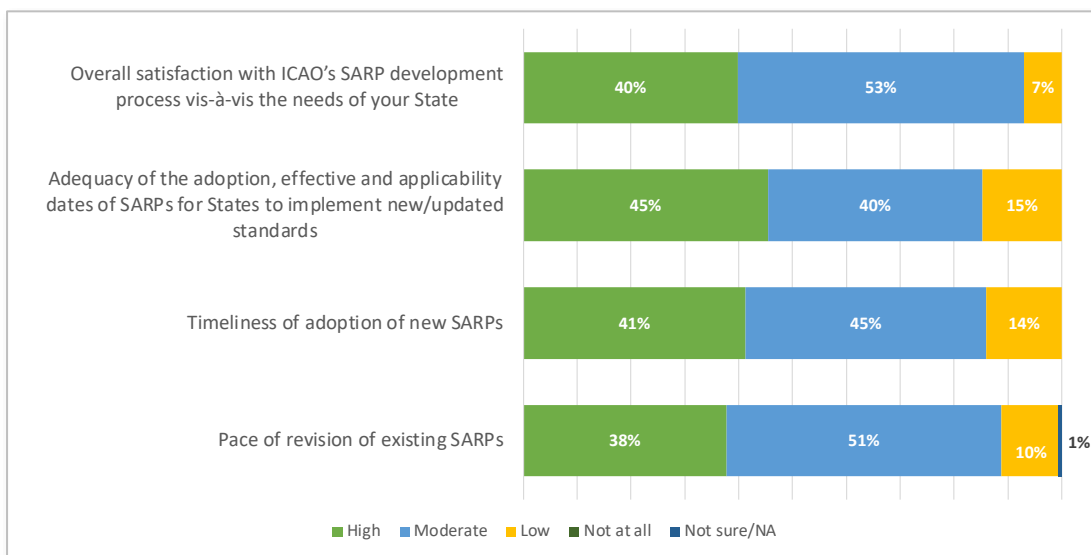
⁹ A41-WP/112 EX/52; A41-WP/111 EX/51; A41-WP/325 EX/138

36. Stakeholders propose embracing a regional risk-based approach to improve the timeliness of adoption of SARPs. While States acknowledge that it is difficult—if not unrealistic—for ICAO to slowdown the process of issuing new/amended SARPs, developed and developing States alike think ICAO’s standard-setting process can be more risk-based and less prescriptive. Many say there is opportunity for the organization to prioritize critical ‘must-have’ SARPs everyone needs to comply with, as well as nice-to-have standards that more advanced States can adopt if they can and want to.¹⁰ Some stakeholders suggest determining must-have and nice-to-have standards at the regional level. Readers should note that the Evaluation of ICAO Standard-Setting Process¹¹ (Recommendation 1) captured some of these recommendations and ANC has agreed on a prioritization methodology to support the decision-making processes related to SARPs development.¹²

“There are a lot of standards that can and should be harmonized globally. We should come together as an organization and identify what those standards are. But there are a lot of standards applied in a prescriptive way that do not impede international operations from happening, so here is where we could do a better job. They are great-to-have but not must-have. For example, in countries with one airport, why are we expecting States to implement everything? It is great to see if they have the great-to-have standards, but they shouldn't be required.”

ICAO Regional Office Staff

Figure 2. Perception of Member States of ICAO’s SARP Development Process



Source: Survey on Needs and Expectations of Member States

37. Using State Letters more efficiently is another recommendation from stakeholders to improve the process of SARP consultation and adoption. Almost 96% of Member States rate the State Letters as highly (71%) or moderately (25%) adequate to offer input on SARPs. However, interviewed stakeholders think that the use of State Letters for other less critical purposes—such as training invitations or surveys—can make this mechanism overwhelming,¹³ particularly for CAAs with limited human

¹⁰ A41-WP/111 EX/51; A41-WP/325 EX/138

¹¹ EV/2018/01

¹² AN-WP/9427.

¹³ In 2016, ICAO HQ sent 109 State Letters. Additional 135 State Letters were sent. About one third of those letters were related to SARPs. In addition to these State Letter, Regional Offices are also sending State letters. SARPs Evaluation 2018.

resources.¹⁴ Stakeholders recommend using a categorization/prioritization system to better denote the urgency of the State Letter and the person who should attend the communication. For instance, they suggest using specific colors (e.g., red titles) for high-priority State Letters—such as those on new/amended SARPs—and a different set of colors for other communication.

Finding 2: ICAO Strategic Objectives are relevant to State needs. However, Economic Development of Air Transport and Environmental Protection are perceived as less clear and more difficult to achieve and implement. Environmental Protection is considered as the Strategic Objective with the least adequate resource allocation. There are recommendations to update the Environmental Protection objective to reflect the outcomes of the 41st Assembly and to split Security and Facilitation into separate Strategic Objectives.

38. Most States and interviewed stakeholders think there are no missing Strategic Objectives, with almost all States rating the five current ICAO Strategic Objectives¹⁵ as relevant. However, ratings related to the clarity, achievability, implementation easiness and adequacy of ICAO resources for effective implementation of the Strategic Objectives fluctuate importantly (Table 2). On average, 98% of States rate all current objectives as highly/moderately relevant. By Strategic Objective, Safety (99%) and Environmental Protection (99%) are considered as the most relevant objectives, followed by Security and Facilitation (98%), Air Navigation Capacity and Efficiency (97%) and Economic Development of Air Transport (96%). There are some variations by ICAO Region, with ESAF rating Safety and MID rating Environmental Protection, respectively, as the least relevant.
39. Regarding the clarity of the Strategic Objectives, Safety (100%) and Security and Facilitation (98%) are rated as the clearest in providing a sense of direction for the organization, followed by Air Navigation Capacity and Efficiency (97%), Economic Development of Air Transport (95%) and Environmental Protection (92%). There are some differences across ICAO Regions. For instance, NACC States rate the clarity of Air Navigation Capacity and Efficiency (79%) and of Economic Development of Air Transport (79%) lower than the rest of the objectives.
40. Safety (95%) and Security and Facilitation (95%) are considered as the most achievable Strategic Objectives, compared to Air Navigation Capacity and Efficiency (89%), Environmental Protection (84%) and Economic Development of Air Transport (83%). By ICAO Region, ESAF, MID and WACAF States rate Environmental Protection (77%, 78% and 82%, respectively) as less achievable than other objectives. In survey comments, States argue that Environmental Protection is the biggest upcoming challenge of the century, requiring great resources ICAO does not have and thus making the objective feel less achievable. Regarding Economic Development of Air Transport, States think this objective is too ambitious and that States have different views on how to approach it (e.g., conditions for fair competition, liberalization of airline ownership and control, or open market access), making the possibility of a harmonized framework less feasible.¹⁶
41. In terms of implementation easiness, Safety (93%) is the highest rated Strategic Objective, compared to Security and Facilitation (87%), Air Navigation Capacity and Efficiency (84%), Environmental Protection (82%) and Economic Development of Air Transport (81%). Across ICAO Regions, APAC and

¹⁴ A41-WP/332 EX/142

¹⁵ Safety: Enhance global civil aviation safety; Air Navigation Capacity and Efficiency: Increase the capacity and improve the efficiency of the global civil aviation system; Security and Facilitation: Enhance global civil aviation security and facilitation; Economic Development of Air Transport: Foster the development of a sound and economically viable civil aviation system; and Environmental Protection: Minimize the adverse environmental effects of civil aviation activities. Source: ICAO Business Plan 2023-2025.

¹⁶ A41-WP/166 EC/11; A41-WP/409 EC/29

SAM States rate the implementation ease of Security and Facilitation objectives (86% and 85%, respectively) lower than other objectives. MID and NACC States rate Air Navigation Capacity and Efficiency (78% and 64%, respectively) as one of the objectives with lower implementation easiness. In line with the findings in paragraph 40, States generally think that the lack of resources within ICAO makes the implementation of environmental protection work more difficult, while the wide range of actions States can take to promote air transport limits opportunities to advance work around economic development in a coordinated manner.

42. The adequacy of ICAO resources to effectively implement its Strategic Objectives is on average the lowest rated category. Safety (84%) is again the best rated objective, followed by Economic Development of Air Transport (81%), Security and Facilitation (80%) and Air Navigation Capacity and Efficiency (79%). A quarter of Member States (25%) think Environmental Protection is the Strategic Objective with the least adequate resource allocation. There are notable regional differences: the least adequately funded objective for ESAF States is Air Navigation Capacity and Efficiency (46% indicated low adequacy); for MID States is Safety (33% indicated low adequacy); for NACC States is Air Navigation Capacity and Efficiency (36% indicated low adequacy) and Economic Development of Air Transport (36% indicated low adequacy); and for SAM States is Security and Facilitation (46% indicated low adequacy).

Table 2. Member States' Assessment of ICAO Strategic Objectives

Rating Categories (high/moderate)	Strategic Objective				
	Safety	Air Navigation Capacity & Efficiency	Security & Facilitation	Economic Development of Air Transport	Environmental Protection
Relevance	99%	97%	98%	96%	99%
Clarity	100%	97%	98%	95%	92%
Achievable	95%	89%	95%	83%	84%
Implementation Easiness	93%	84%	87%	81%	82%
Adequacy of ICAO Resources for Effective Implementation	84%	79%	80%	81%	75%

Source: Survey on Needs and Expectations of Member States

43. While Economic Development of the Air Transport is rated lower across most categories and Environmental Protection is perceived as a less clear and achievable objective, stakeholders acknowledge their importance and recommend improving communication around their connection to other Strategic Objectives. A NACC stakeholder comments: *"Because aviation is so important to economic development, if we can support aviation well, we are then serving the objective of economic development. We need to maintain excellence and [provide] a good picture of where the contributions and challenges are."* A SAM stakeholder adds: *"Economic development and [environmental] sustainability do affect our capacity to achieve the other objectives. We need to prove how much benefit aviation brings to the economy. We are not handling environment right. It is an area where we can tell how aviation can help society. We know internally how much aviation matters to these issues, but we need to do this more externally as well."*
44. Among stakeholders who think ICAO should modify or expand its Strategic Objectives, two common requests are to update the Strategic Objective on Environmental Protection and to split Security and Facilitation into two separate objectives. Regarding Environmental Protection, stakeholders request to reword the objective to reflect the outcomes of the 41st ICAO Assembly around this objective—i.e.,

achieving the long-term aspirational goal of net zero emissions for aviation by 2050.¹⁷ Stakeholders specifically ask to include the exact text agreed upon during the Assembly regarding environmental sustainability. As for Security and Facilitation, stakeholders think that these are large and complex topics on their own and that ICAO could be more effective if they were tackled and resourced separately.

45. When asked about the top areas for new SARPs in the next 2 triennia, States primarily list Unmanned Aircraft Systems (UAS), including Remotely Piloted Aircraft Systems (RPAS), Operational Safety (OPS) and environment-related Long Term Aspirational Goals (LTAG) and Sustainable Aviation Fuels (SAF). Regarding areas where existing SARPs will need revisions/updates in the next 2 triennia, States identify OPS, Environmental Protection (including Carbon Offsetting and Reduction Scheme for International Aviation (CORSA) and SAF), UAS and Personnel Licensing (PEL) as top priorities.¹⁸

Finding 3: In Stakeholders' view, ICAO lacks adequate mechanisms to systematically identify and prioritize State needs, preventing the organization from using resources more efficiently to address critical issues. They recommend establishing a systematic State needs assessment process to inform the development a well-defined Country Profile to better prioritize work across its Strategic Objectives.

46. Although most States and interviewed stakeholders think there are no missing Strategic Objectives, many highlight ICAO's inadequate understanding of State needs as a major barrier to prioritize work across the five Strategic Objectives. Most stakeholders stress that ICAO does not currently have a good mechanism in place to identify and prioritize State needs systematically, which results in spreading its resources thin to accommodate a wide range of work. In the view of stakeholders, this prevents the organization from deepening its work and being more effective across its normative, monitoring and implementation support workstreams.

"There is no single role within ICAO to identify State needs. We only have Strategic Objectives. Each role within each Strategic Objective has a different sense of the needs and expectations of the States. ICAO has to have a clear understanding of State needs as one ICAO—not the understanding of TCB or of this and that Bureau. ICAO needs to have a country profile for each State with the top State needs. Once those needs have been identified, we can prioritize work."

ICAO Headquarter Staff

47. Stakeholders propose establishing a systematic State needs assessment process to create and inform a Country Profile. Such profile is to describe the situation of aviation in the country and list the 5 most pressing needs of the State for the next 3-5 years. In their view, this can help inform where to focus efforts related to SARP implementation. Stakeholders also suggest using such country profile to inform organizational work around auditing (e.g., focusing on States meeting critical safety and security requirements, if they have not met those yet) and implementation support (e.g., focusing assistance and resources on addressing core needs before tackling less pressing, politically motivated requests), as further discussed in subsequent sections of this report.

"Prioritizing is a challenge for ICAO. There should be a mechanism to say 'no' to the Council or a guide on what we should prioritize and what should be pushed aside. But we can't be adding up forever."

ICAO Headquarter Staff

¹⁷ A41-WP/545 EX/259; A41-WP/502 EX/241; A41-WP/495 EX/239; A41-WP/476 EX/224

¹⁸ A41-WP/200 EX/88; A41-WP/568 EX/266; A41-WP/545 EX/259; A41-WP/504 EX/243; A41-WP/502 EX/241; A41-WP/495 EX/239; A41-WP/476 EX/224

48. Below is a summary of the most pressing priority needs and expectations for standard setting in the next 2 triennia, as identified by stakeholders:

Box 1. Summary of the Priority Needs and Expectations of ICAO Member States for Standard Setting in the Next 2 Triennia

- | | |
|---|--|
| <ul style="list-style-type: none"> • Identify and prioritize State needs based on regular systematic State need assessments. • Set criteria to prioritize SARPs ('must-have' versus 'nice-to-have' standards) based on State needs. • Develop SARPs based on anticipated aviation needs for the next 5-10 years to reduce need to issue/amend SARPs too frequently. • Improve the participation of States not represented in Panels/ANC/Council in Panel meetings through virtual technology. | <ul style="list-style-type: none"> • Improve adequacy and timeliness of guidance material, including translation into ICAO official languages. • Create a categorization/prioritization system for State Letters to better facilitate the SARP consultation process. • Top areas requiring new/amended SARPs include UAS/RPAS, OPS, PEL and sustainable aviation, including LTAG, SAF and CORSIA. |
|---|--|

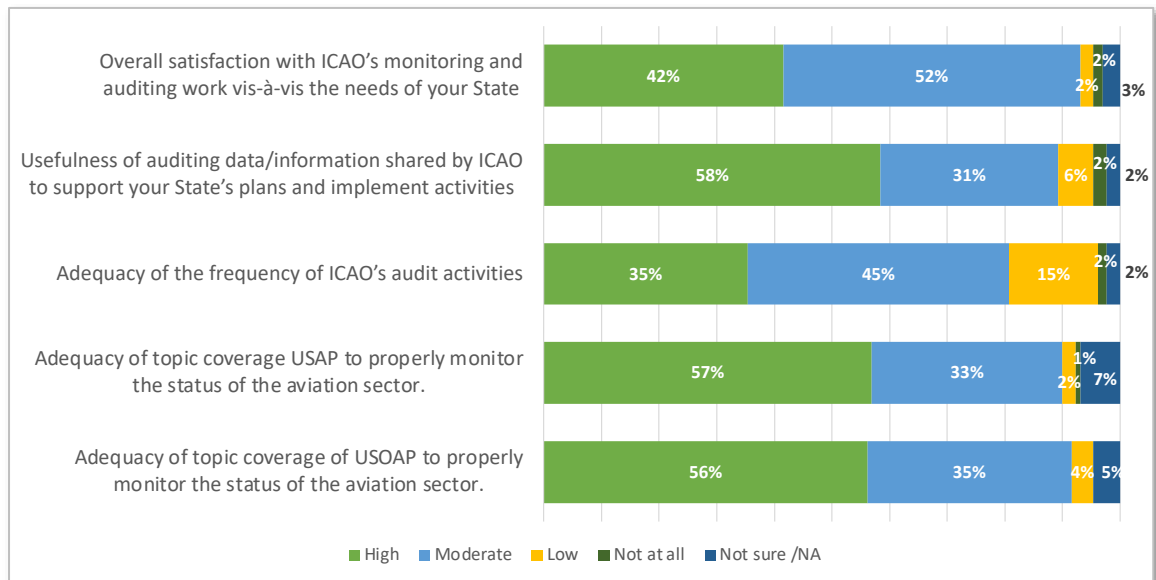
ICAO's Monitoring and Auditing Work

Finding 4: Member States positively assess ICAO's monitoring and auditing work, including the relevance of the Universal Security Audit and Universal Safety Oversight Audit Programmes to identify gaps. While most States wish to keep the ICAO audit programmes as they currently are, about one third recommend expanding the programmes to cover more aspects of critical annexes, particularly Annex 9. There are opportunities to improve Protocol Questions, audit tools and guidance materials.

49. In general, Member States are satisfied with ICAO's monitoring and auditing work, with 93% being highly (42%) or moderately (52%) satisfied with ICAO's monitoring/auditing activities (Figure 3). Most States (95%) rate the organization's monitoring and auditing activities as highly (65%) or moderately (27%) relevant to address their needs. Satisfaction with ICAO's monitoring and auditing work is higher among ESAF, MID, SAM and WACAF States (100% each), slightly lower among APAC (90%) and NACC States (93%), and lower among EUR/NAT States (86%).

50. Most States consider ICAO's Universal Security Audit Programme (USAP) and the Universal Safety Oversight Audit Programme (USOAP) as relevant to address their needs. States specifically find the topic coverage of USAP (90%) and USOAP (92%) as highly/moderately adequate to properly monitor the status of the aviation sector locally, regionally and globally. Most States (89%) think the audit data/information shared by ICAO to support Member States' plans and to implement activities has been useful, with some regional differences: 16% of EUR/NAT States rate ICAO's audit information as of low or not usefulness.

Figure 3. Assessment of Member States of ICAO's Monitoring and Auditing Work



Source: Survey on Needs and Expectations of Member States

51. Table 3 below summarizes the main strengths and challenges of the ICAO Audit Programmes, as identified by States in the survey as well as in Assembly Working Papers.¹⁹

¹⁹ A41-WP/7 EX/3; A41-WP/59 EX/28; A41-WP/309 EX/131; A41-WP/379 EX/173

Table 3. Member States' Perception on the Strengths and Weaknesses of ICAO Audit Programmes

Programme characteristics, as identified by States	USAP	USOAP
Strengths	<ul style="list-style-type: none"> • Programme provides States with a good understanding of their security situation and helps them improve their security oversight systems. • Quality and high level of expertise of ICAO auditors. • Uniformity and comprehensiveness of security topics covered by the Programme. 	<ul style="list-style-type: none"> • Self-assessment tool provides States with a good understanding of strengths and gaps in their safety oversight systems. • Level of comprehensiveness and topic coverage of the Programme. • Transparent and consistent approach that helps States harmonize practices regionally and globally.
Challenges	<ul style="list-style-type: none"> • Lack of timely follow-up (including follow-up audits) on State performance after a full audit. • Shortage of ICAO auditors.²⁰ • Programme is too document based. • Insufficient guidance material/orientation. • Lack of State's internal capacity (financial and human) to address gaps identified through USAP. <p><i>See Finding 5 below for more detailed feedback on the frequency of audits.</i></p>	<ul style="list-style-type: none"> • Programme can be too activity-driven (e.g., yes/no questions on doing/having specific activities/conditions) when it should be more risk-based. • Shortage of qualified auditors. • Lengthy periods of time between audits. • While the Online Framework (OLF) is considered a useful tool, several stakeholders mention weaknesses in the offline version.²¹ <p><i>See Findings 5 and 6 below for more feedback on the frequency of audits, risk-based approach and the OLF.</i></p>

Source: Survey on Needs and Expectations of Member States

52. Over half (55%) of Member States wants ICAO's audit programmes to remain the same, while nearly a third (31%) think the programmes should be expanded to cover additional SARPs/Annexes. By ICAO Region, MID (88%) and APAC States (81%) prefer keeping audit programmes as they currently are, whereas a large proportion of WACAF (47%), EUR/NAT (39%), NACC (33%) and SAM States (31%) lean towards expanding the programmes. Among States that recommend covering additional SARPs, almost half (49%) mention Annex 9 as a critical annex to be fully audited. This is consistent with proposals submitted to the ICAO 41st Assembly, where regional organizations suggest establishing a National Facilitation Oversight System "to enable Member States to monitor the effective implementation of Annex 9."²² States also suggest RPAS-related SARPs (17%), Annex 19 (12%) and Annex 16 (5%) as additional areas to cover in audit programmes.

²⁰ A41-WP/7 EX/3

²¹ A41-WP/379 EX/173

²² A41-WP/259 EX/111; A41-WP/312 EX/133

53. Regarding Annex 9, stakeholders think there is opportunity to cover all SARPs under this annex to strengthen States' capacity to respond to future crises. While stakeholders acknowledge that Annex 9 covers other national authorities and this can be challenging, they also think doing this work is necessary after the learnings from the COVID-19 pandemic and the anticipation of similar crises in the future.

"After COVID-19, Annex 9 has gained more momentum. We are looking forward to seeing more Facilitation questions in the audit programmes. Adding this annex also involves other stakeholders and it can be difficult to harmonize the coordination and respond fast to ICAO. However, this is a long overdue shortcoming of ICAO."

ESAF State

Finding 5: Across all areas assessed regarding ICAO's auditing activities, the frequency of audits is the lowest rated. While stakeholders acknowledge the organization's resource constraints to audit more countries per year, many stakeholders think this limits ICAO's capacity to do effective continuous monitoring and have a real-time picture of the aviation system. Lack of clarity around how ICAO selects States for audits is also a recurrent comment.

54. In the survey, 17% of Member States rate the adequacy of audit frequency as low or not adequate at all. This perception is more pronounced among ESAF (23%), EUR/NAT (23%) and NACC States (21%). Stakeholders recognize ICAO's efforts to improve the auditing programmes as well as ICAO's budgetary and human resources limitations to expand the number of yearly audits. Yet, many are concerned about the

"Auditing is essential and needs to be done regularly and properly. Of course, you can't audit 193 states in one year, but 10-20 is not acceptable. It has to be a more dynamic mechanism."

ICAO Council Member

organization's capacity to undertake effective continuous monitoring when some States have not been audited in 7 years or more. For instance, a NACC stakeholder comments: *"There has to be a balance. Our last audit was more than 12 years ago, and a lot has changed in that time. [Audits] help us to have more regular assessments and to get a sense of progress."* An APAC stakeholder mentions: *"There is some obsession with the Effective Implementation (EI) score. Does it really prove [States] got better because on one specific day they went from 62 to 70, especially when ICAO goes every 7-10 years to a country? There should be more emphasis on continuous monitoring."*

55. Most stakeholders suggest 5 years as an adequate timeframe to conduct full audits and partial follow-ups every 1-3 years, depending on the gaps identified by the audit. Stakeholders think this proposed timeframe provides a more real-time picture of the global aviation system, while it allows States with sufficient time to address the feedback and prepare for subsequent audits.

56. In the context of low frequency of audits, stakeholders highlight the overuse of the EI score as detrimental, arguing it only encourages States to adopt an 'exam approach' to make temporary changes that may not be sustained in time in order to 'pass' the audit. Stakeholders say States take at least 12 months to prepare for an ICAO audit, with many getting candid about the low sustainability of those preparations once they have reached the EI score they were looking for. Emphasis on preparing for audits was also evident in survey comments and interviews, with some stakeholders even proposing for ICAO to conduct a "no-consequence audit" every 4 years—i.e., right before the proposed full audit every 5 years—to give States the opportunity to prepare better for the full audit. When asked why they need 12 months to prepare, stakeholders indicate that the EI score can impact other aspects beyond

the audit. For instance, an APAC stakeholder explains: *"If you get a bad result, it can hurt your economy, so preparation is important."*

57. In the view of several stakeholders, the lack of more frequent audits combined with this 'exam approach' may be providing ICAO with an incomplete picture of safety and security issues on the ground. ICAO staff acknowledges these shortcomings: *"From a monitoring point of view, we need more data. Our [auditing] service is good, but it is not at the level we would like to have. We don't have a good picture of realities on the ground. This is because we don't have the resources. We need to have a better understanding of the risks and the needs on the ground."*

58. Another factor potentially affecting ICAO's understanding of realities on the ground is reporting challenges among States with limited resources. Some States indicate that they are complying with ICAO's standards but are unable to report it due to staffing limitations and the time

it takes to upload responses to ICAO systems. For instance, an EUR/NAT State explains: *"Our aviation activities are not too impacted because we fulfill EU regulations. The actual procedure to report to ICAO is lagging, even though we are complying. The problem is not the audit programme itself but the electronic response to the differences and responding to the State Letters, since the amount of work you have to do to insert this information into the platform is too much for our team size and time resources. So, the information in ICAO's audit programme doesn't show the actual picture of where we are at."*

59. While stakeholders agree that ICAO's auditing programmes cover relevant topics, many think there are opportunities to streamline Protocol Questions (PQs), improve the Online Framework (OLF) tool and enhance the guidance material. Stakeholders say there are repeated PQs and suggest choosing one per audit area. Many mention challenges related to PQs comprising various sub-PQs, whereby failing one sub-PQ can affect the entire PQ outcome; stakeholders think this provides a limited picture of actual progress. For instance, an ESAF stakeholder comments: *"The PQs do cover the Annexes, but sometimes they cover the same topics. In other cases, one question covers 6 different topics. If you get one topic unsatisfactory, all 6 areas get unsatisfactory. This can affect the EI importantly and does not give a full picture of implementation level because in some areas you are doing well but it looks like you*

"States end up investing more in preparing for an ICAO audit than on security and safety. States get in panic mode and stop a lot of their critical activities to prepare for an audit. The audit is a snapshot on a specific day in time. If you get a satisfactory result, you still don't get a good picture of what's happening because States may have been preparing for 12 months with all resources to pass the audit. When they are preparing for the audit, there are no budget issues and there is full political support, but this is not the reality once the audit is over. Once finished, they go back to their old habits. This doesn't help much. Also, the timing of audits is not right—too long passes before you have another audit."

Regional Organization

"Some PQs can have sub-PQs and you may lose direction of the overall PQ. There is a lot of duplication of PQs. Some PQs are almost the same, so you start overthinking how you have to answer. If you don't know how to answer one sub-PQ, it can throw out your entire PQ. And the guidance is not too clear for some PQs. PQs are also supposed to be performance-based, but then the questions are yes/no, making them too prescriptive. You can't show progress if they knock out the entire PQ based on one sub-PQ. Sometimes we have to take a guess and there is no one at ICAO that can answer these questions for us. OLF is too outdated and very hard to update information. If there is a character it won't take, it doesn't give us an error, so we don't know why it is not uploading. And there are limitations on file size. Some PQs require a lot of evidence, but we can't upload everything, so the auditor has incomplete information."

NACC State

are not doing well at all." Some of these challenges are also highlighted in Assembly Working Papers.²³

60. Stakeholders also report issues to update and upload information to OLF, describing it as time-consuming and glitchy. Regarding the guidance provided for each PQ, stakeholders say the links often do not offer a straightforward answer on how to respond to the PQ. They recommend making such guidance more concise and ensuring it really helps answer the PQ. For instance, an EUR/NAT State says: *"In the material, sometimes they provide 3-4 links to answer the PQ and it's not easy to find a clear answer. Sometimes we review all those documents, and we still can't figure out how to answer the PQ."*
61. Although ICAO staff explains that they do a risk assessment to decide who gets audited in the next 18 months, many States are not aware of such process. Stakeholders think ICAO could do a better job at communicating how States are selected for audits. An APAC State shares: *"ICAO has not set clear expectations on how this is decided. Sometimes it feels like you hit the lottery. We haven't had an audit since 2014. So, the question is: is this because our level of preparation? ICAO should explain how this is decided. It takes usually more than a year to prepare for an ICAO audit."* Similarly, an EUR/NAT State mentions: *"I haven't been able to follow how audits are planned. For example, what they account for to decide who to audit and when. In my 10 years [at the CAA], I have never heard how these audits are planned, it does not seem too transparent, and it does not help around how to prepare for the audits."*

Finding 6: Member States request ICAO to deepen the risk-based approach to auditing in order to streamline the programmes, better use ICAO's limited monitoring resources, increase the frequency of audits in States that need them the most and thus have a more realistic understanding of the aviation landscape.

62. Member States think a full scope audit is not always necessary and that there is opportunity to focus on critical security and safety aspects, particularly in the case of States with limited resources and technical capacity. In line with the findings described in paragraphs 46 and 47, stakeholders think the identification and prioritization of State needs through a country profile can help streamline the audit programmes based on a risk-based approach. A NACC stakeholder shares: *"The full scope audit is a huge undertaking. It should be more risk based, because you don't need to go over 700+ PQs every time."* Similarly, a WACAF stakeholder explains: *"Maybe the focus should be on the daily safety and security activities, which is the real picture. Have States focus on this rather than on one spot-check every 7 years."* An APAC stakeholder also mentions: *"I think audits should focus on performance and the countries that most need it. They insist on auditing the UK, when there are other countries requesting audits to see if they are improving. There is opportunity to narrow the PQs and focus on the critical things. And they need to be tailored for specific needs. The risks of the JFK airport are not the same as the risks of an airport in [a small developing country]. There should be more emphasis on a risk-based approach."*

"When to audit should depend on what the gaps of the State are. There are things that are not so critical. Some things don't make sense to reassess every two years because they don't change as much. But the 8 critical areas are dynamic, and you want to see States take urgent action and there you can reassess every two years. So, again, it should be more risk-based. Some PQs must be verified every time, but others don't need to be."

ICAO Regional Office Staff

²³ A41-WP/59 EX/28; A41-WP/379 EX/173; A41-WP/488 EX/235.

63. Several stakeholders highlight the Systemic Assistance Programme (SAP)—a NACC initiative that helps States focus on addressing the most critical issues identified in audits rather than trying to correct everything—as a step in the right direction. The programme has been implemented in various NACC States. A NACC stakeholder explains: *"[With the SAP,] you concentrate on the must-do rather than the good-to-have. It gets States motivated and you get political and resource commitments because [States] now see the value of the investment. If they don't see progress, they lose motivation."* A NACC State participating in SAP adds:

"We don't do enough analysis on what the States need. Even on the monitoring side, we don't have this analysis. Audits only give you one perspective, which is the deficiencies. They do not identify State needs. We need complete and current country profiles on Member States to determine when, where and what to focus the audits on."

ICAO Headquarters Staff

"The Systemic Assistance Program is a marvelous programme because it put in front of me what the critical issues were. We are six States, so this systemic initiative aligns well with our structure because we coordinate everything together, which is how it should be done."

64. Emphasizing on a risk-based approach requires extensive communication with the States to ensure the process of selecting States for audits is clear and seen as fair. For instance, an industry partner comments: *"I see the risk-based approach as a fair approach because it is not fair to be equally audited when you have done your work."* However, other States report unfair treatment in the way the auditing approach is applied. An EUR/NAT stakeholder explains: *"For security, the audit programme should be the same for everyone. But some States feel they get a different security audit than other States. There is a feeling that EU developed countries do not need to answer all questions of the audit protocol, whereas other States have to go through the entire [audit process]. States feel this is not fair treatment and that it undermines the principle of universality."* These comments are not only made by smaller or developing States. Large and well-resourced Member States also raise concerns about the fairness of the auditing approach across countries, as captured by this survey comment from a NACC State: *"[ICAO should] ensure that [SARP] implementation by all Member States are audited/observed by ICAO auditors. It is unacceptable that one group of states is not equally subject to on-site verification of effective implementation by ICAO auditors, only desk-top reviews."* As such, it is critical for ICAO to make sure that whatever auditing approach is used, there is transparent communication with and buy-in from all States.

65. While ICAO staff explains that the security audit programme combines information provided by the States with information collected by ICAO and other organizations, stakeholders feel there is opportunity to further leverage intelligence collected by other aviation actors to have a more complete picture of realities on the ground. They also think something similar could be replicated for safety-related auditing activities.²⁴ For instance, the representative of a regional organization shares: *"PQs are an open-book exam whereas continuous monitoring can be better done by pulling information from different sources, such as IATA audits. This provides a better picture, particularly of the root causes of the issues."* Similarly, an ICAO staff member comments: *"A country profile should not only comprise ICAO data, but also information from EASA, CANSO, IATA, etc. We should put that information together and then prioritize auditing needs and approach for 3-5 years. Once those main priority areas are covered, we can move on to auditing new priorities."*

²⁴ A41-WP/156 EX/70

66. To increase the frequency of ICAO audits and reduce costs, many stakeholders propose adopting a regional approach. Importantly, there seems to be a lack of understanding among stakeholders around how region-based auditing can create a conflict of interest, suggesting the need for better communication around this topic from ICAO to the States. Specifically, stakeholders recommend decentralizing auditing activities to the ICAO Regional Offices. To avoid conflict of interest, some suggest having States fund the presence of ICAO auditors in their regions,

"ICAO sometimes says they have shortage of auditors, and this is why they can't go to too many countries in a year. But we have well qualified regional auditors that ICAO could leverage to continue getting feedback while the next ICAO audit comes. This way you can truly provide continuous monitoring."

Regional Organization

whereas others propose leveraging regional oversight organizations.²⁵ Others request having regional experts for support and not auditors necessarily. An APAC stakeholder comments: *"All CAAs are doing standard-setting at headquarters and oversight through regional offices. ICAO is the only [organization] where headquarters does the auditing. They say that this is a conflict of interest because the staff is in the regional office, but they are ICAO staff. So, how can there be conflict of interest?"* An ICAO Council Member says: *"There is opportunity to carry out audits at the regional level, as it is done in Europe, so that it is less of a burden. We need to figure out how to scale this to every region and not just some regions. And we should never duplicate. There is progress to be made in this sense."* Several stakeholders made remarks similar to the ones captured in these quotes, evidencing a large misunderstanding around how decentralizing auditing activities to the Regional Offices or outsourcing them to a third-party regional organization can adversely alter auditors' incentives to remain as neutral as possible.

67. Below is a summary of the most important priority needs and expectations identified by stakeholders for monitoring and auditing in the next 2 triennia:

Box 2. Summary of the Priority Needs and Expectations of ICAO Member States for Monitoring and Auditing in the Next 2 Triennia

- Increase the frequency of audits by deepening the use of a risk-based approach based on State context and needs.
- Consider expanding USAP and USOAP to include additional annexes, particularly Annex 9.
- Improve communication on how States are selected for audits each year.
- Streamline PQs, improve OLF tool and enhance guidance material to answer PQs.

²⁵ A41-WP/243 EX/109; A41-WP/92 TE/20; A41-WP/538 TE/199

ICAO's Implementation Support Work

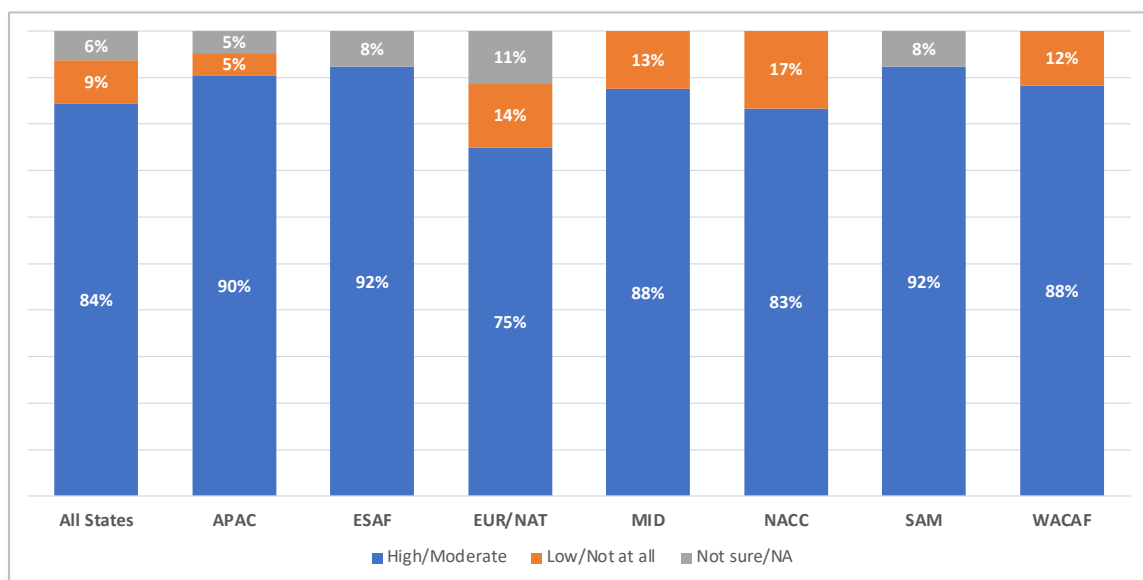
Finding 7: Member States have an overall positive perception of ICAO's implementation support work. However, it is the area where States identify the largest gaps. Although increased implementation support is requested across all Strategic Objectives, Security and Facilitation and Environmental Protection are priority areas for assistance. A Country Profile identifying top State needs is recommended again to better target resources for implementation support.

68. Stakeholders recognize ICAO's recent efforts to improve implementation support, such as launching the Implementation Support Policy (ISP) and combining technical assistance and technical cooperation work under TCB.²⁶ Yet, while most States (84%) rate the ICAO's implementation support activities as highly/moderately effective to help them implement SARPs, this is the lowest rated area relative to the other streams of ICAO work assessed (i.e., standard-setting and monitoring/auditing work). Across ICAO Regions, perceptions around the effectiveness of ICAO's implementation support work are similarly positive but fluctuate (Figure 4). Notably, important proportions of NACC, EUR/NAT, and MID States rate ICAO's implementation support activities as of low or no effectiveness (17%, 14% and 13%, respectively).²⁷

"Implementation support is where we have a big gap. A lot is demanded from the States in terms of how much of the standards need to be implemented, regardless of their capacities and resources. A limitation in the way ICAO writes standards and expects implementation is this idea of harmonization. But harmonization does not mean equality."

ICAO Regional Office Staff

Figure 4. Perceptions of Member States of the Effectiveness of ICAO's Implementation Support



Source: Survey on Needs and Expectations of Member States

²⁶ A41-WP/28 EX/16; A41-WP/24 EX/12

²⁷ A41-WP/103 EX/49

69. Stakeholders think ICAO has an inadequate understanding of the areas where implementation support should be focused on precisely because the organization does not have a full picture of State needs, as discussed in paragraphs 46 and 47. In this regard, stakeholders highlight again the need for a country profile to identify priority needs as well as resources necessary to properly address those needs. Stakeholders think this can help simplify implementation support activities and better use the already limited organizational resources, rendering the profiles as an effective mechanism to decline assistance requests. For instance, some stakeholders say States can make politically motivated requests for implementation support in non-critical areas when they have not yet addressed critical safety and security issues. An ICAO staff member describes the following: *"If a State is requesting implementation support, we can show them the areas where they are weak, per the country profile, and where we can help with the resources we have. And we do not go beyond those core needs."*
70. In addition to helping make better use of limited internal resources, stakeholders think the country profile can also help States keep their administrations accountable in a more sustainable way. For example, a SAM State shares: *"The main challenge [with implementation] is to sustain the work we have been doing across administrations because you can face important delays and setbacks in the work every time there is a change in government. ICAO could use the country profile and the advances made around those needs so that every administration has clear what the expectations are."*
71. States that have financially supported implementation in other States also think a country profile can help better target voluntary resources. Some Donor States say they often receive financial support requests directly from other States and that these requests can be similar to projects they are already working on with ICAO in neighboring States. To these stakeholders, ICAO could do a better job at identifying and channeling all these needs so that a more comprehensive and cost-efficient assistance can be tailored and funded.
72. Regarding the current level of implementation support per each Strategic Objective, over half of States think ICAO should do more to better assist countries in implementing SARPs across all objectives. Specifically, States rate Security and Facilitation (70%) and Environmental Protection (67%) as the two areas of highest priority to provide more implementation support to the States. ESAF and WACAF States are more likely to recommend more implementation support across all five objectives, with ratings over 70%. In contrast, EUR/NAT States are more likely to suggest maintaining current levels of implementation support across most objectives, except for Security and Facilitation and Environmental Protection (64% and 55%, respectively).
73. A large proportion of Member States has received implementation support from ICAO, primarily through the Regional Offices (76%) and about 39% received from Head Quarters Bureaus (ANB/ATB and TCB). Over a third has received assistance from an ICAO-coordinated Regional Safety Oversight Organisation (RSOO), Cooperative Development of Operational Safety and Continuing Airworthiness Programme (COSCAP) or Cooperative Aviation Security Programme (CASP) (34%). By ICAO Region, APAC, ESAF and WACAF States are more likely to have received implementation support from ICAO

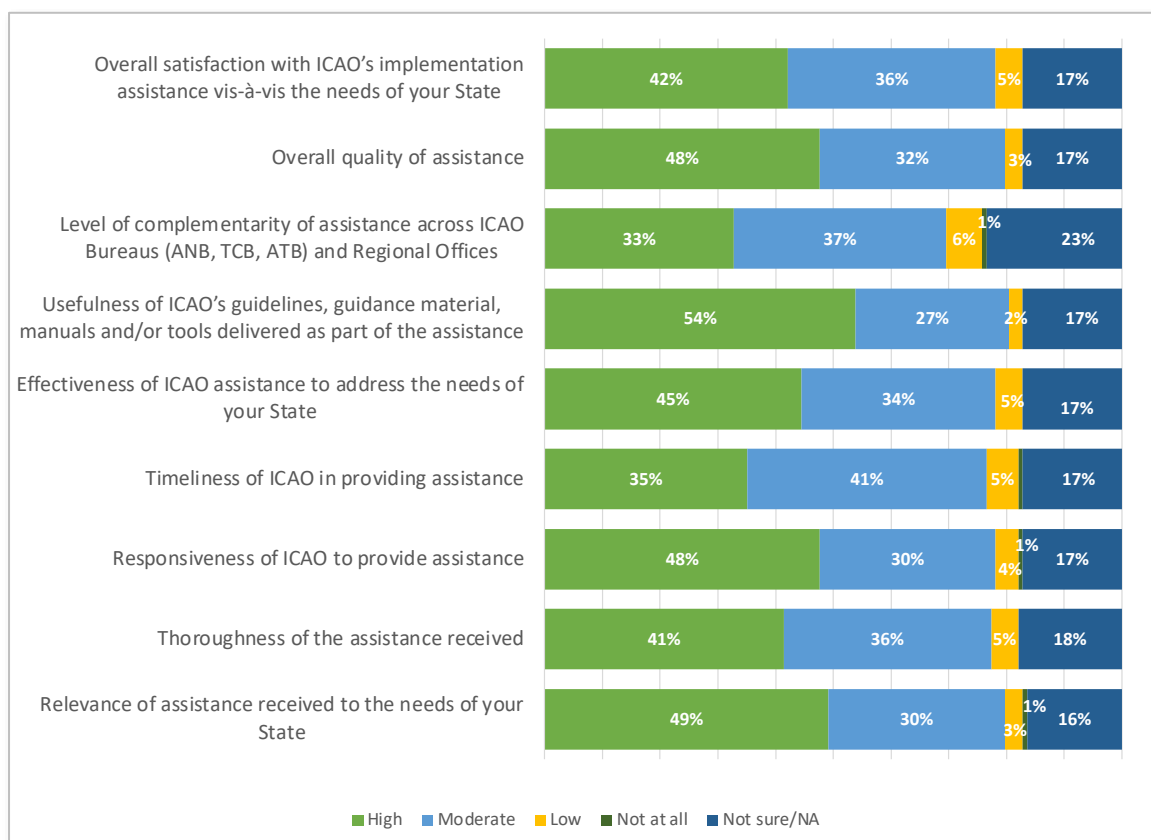
"As donors of voluntary resources, ICAO could help us better target resources. For example, the current Business Plan has 200+ projects. Some are funded and some are not. We would like to have more granular information around what the most pressing areas that need funding. We also don't know what 100% funding per project is. All we know is that ICAO needs funding for a project. But if you tell me what 100% funding is, we may be able to fund it all. ICAO could do a better job at showing us State needs and gaps so that we can better allocate resources."

Donor State

through any of these channels. EUR/NAT is the ICAO Region least likely to have received any implementation assistance from ICAO.

74. Among States that have received implementation support from ICAO in the last two triennia, 78% rate such assistance as highly/moderately satisfactory. There are notable differences across ICAO Regions, with APAC (71%) and EUR/NAT States (57%) reporting the lowest levels of satisfaction with ICAO's assistance (Figure 5). Most countries have received assistance for training courses (76%), followed by assistance to organize technical missions to prepare or address the results of an audit (63%) and to improve the effective implementation of the eight critical elements of the State's Safety Oversight System (60%). Other important proportion of States have received support related to guidelines, manuals and/or tools (45%), to improve the effective implementation of the eight critical elements of the State's Security Oversight System (43%) and for regional capacity building through technical cooperation projects, such as COSCAP, CASP and CAPSCA.
75. States that have received implementation support from ICAO positively rate the relevance of such assistance to their needs (80%), the quality of the assistance (80%) and the usefulness of ICAO's guidelines, manuals and/or tools delivered as part of the assistance (80%). ICAO's responsiveness to provide the assistance (78%), the effectiveness of the assistance (78%), the thoroughness of the assistance (77%) and the timeliness in providing the assistance (77%) are rated lower. The level of complementarity of assistance across ICAO Bureaus (ANB, TCB, ATB) and the Regional Offices are rated the lowest (70%).

Figure 5. Perceptions of Member States of ICAO's Implementation Support



Source: Survey on Needs and Expectations of Member States

76. While stakeholders are generally satisfied with ICAO's implementation support, several States have received the assistance at no cost and indicate they would have not been able to cover the cost otherwise. In interviews, States say the assistance received was either covered by ICAO or by another State through voluntary resources.²⁸ For instance, an EUR/NAT State shares: *"The technical assistance delivered by ICAO has been highly effective and useful to us. We did not pay for that assistance. ICAO covered the cost. If not for that, we could have not been able to pay for the support because our budget is limited even for our own trainings."* Stakeholders recommend expanding funding mechanisms for States that are not able to afford cost-recovery implementation support from ICAO.

"Last year, we got help with iPacks related to AGA and aviation security. The iPacks were very helpful because they improved security and safety a lot. We need more of that assistance, but ICAO covered the cost. Without ICAO paying for it, it would have not been possible."

ESAF State

Finding 8: The centralization of ICAO's implementation support at Headquarters is identified as a barrier to more effective and efficient assistance to the States. Stakeholders highlight the importance of more localized technical expertise and support at the Regional Offices level to improve ICAO's implementation support activities.

77. Stakeholders highlight ICAO's current organizational structure as a challenge to better assist States in implementing SARPs. They specifically note three barriers to better assist States: 1) TCB is centralized at ICAO Headquarters and highly dependent on the use of consultants; 2) insufficient technical expertise at the Regional Offices in some areas; and 3) nearly equal distribution of financial and human resources across Regional Offices, despite the context and needs across regions vary widely. Stakeholders generally think that TCB's heavy reliance on consultants to provide technical assistance and implementation support makes the process too rigid, as consultants cannot be flexibly engaged across multiple projects and are not accessible for follow-up support once their contract is over. In their view, this keeps experts in technical silos and restricts the organization's capacity to maximize those technical resources.²⁹

"We need a transformational change to focus on capacity building, technical assistance and SARP implementation support. I think most people at ICAO understand this, but it is difficult to make it happen because ICAO's structure is too centralized at Headquarters. Most implementation support staff is at Headquarters, while Regional Offices lack resources and expertise. We can't accomplish implementation with this structure."

ICAO Staff

78. In the survey and interviews, stakeholders express preference for getting implementation support from the Regional Office, given the staff's familiarity with the regional context and their ability to provide assistance in the local language. Yet, many note the lack of sufficient human and financial resources, as well as technical expertise, at the Regional Offices.³⁰ For instance, an ESAF stakeholder comments: *"Africa does not have regional experts in air transport. This makes it hard for ICAO to provide implementation support in this area."*

²⁸ A41-WP/47 EX/23

²⁹ A41-WP/28 EX/16

³⁰ A41-WP/261 EX/112

79. In-country implementation support is also a common request and reasoning for increasing the availability of more technical expertise at the Regional Offices. Stakeholders think that implementation support can be better delivered directly on the ground, particularly in less resourced countries. An APAC State explains: *"We need in person support to help us better deal with the SARPs. The ability to get someone here from ICAO to work with us on the ground, directly see the challenges and give us guidance and direction is our big priority need for the next 6 years."* An ICAO staff member shares: *"Often, what States want is to have access to someone for support."* Stakeholders recommend having most TCB staff and technical experts be located across the Regional Offices than at ICAO Headquarters.

"In my view, we can't rely long term on this model. This system is not sustainable because most States prefer to make a liaison with the Regional Office than with ICAO Headquarters. It is better to have a TCB person at the Regional Office to better promote ICAO services, including cost-recovery support, provide more direct assistance and supervise the projects directly."

APAC State

80. An example of States' efforts to have greater regional presence from ICAO is the initiative of some APAC States to fund an ICAO office on Pacific Islands. An APAC stakeholder explains: *"We have a project to put an ICAO office on Pacific Islands. Singapore is funding the staff and recruitment is almost complete. Fiji and Papua New Guinea are providing the resources for the office. We are hoping to launch this office by April."*

81. Stakeholders also point to the nearly equitable division of financial and human resources across ICAO Regional Offices as a challenge to effective implementation support. For instance, an ICAO Regional Office staff member shares: *"We only have one officer for Security and Facilitation, whereas you usually have 2 officers in the other areas. How do you provide assistance without officers with expertise in the area?"* Stakeholders think the number of staff and financial resources across Regional Offices should be based on the number of States the offices support, as well the specific needs and SARP implementation gaps of each region.

"We see more demand from our States around implementation support. But providing this assistance requires more resources. At this Regional Office, we are fully busy with implementation support work and we don't have in-house technical expertise in some areas. Human and financial resources are quite proportional across Regional Offices, even though the number of States and the demand for implementation support is difference across regions."

ICAO Regional Office Staff

Finding 9: ICAO's coordination work and partnerships are positively rated. However, States think the coordination between ICAO Bureaus and their CAAs could be better. Partnering with the industry is identified as an opportunity to expand the quantity and quality of implementation support to States.

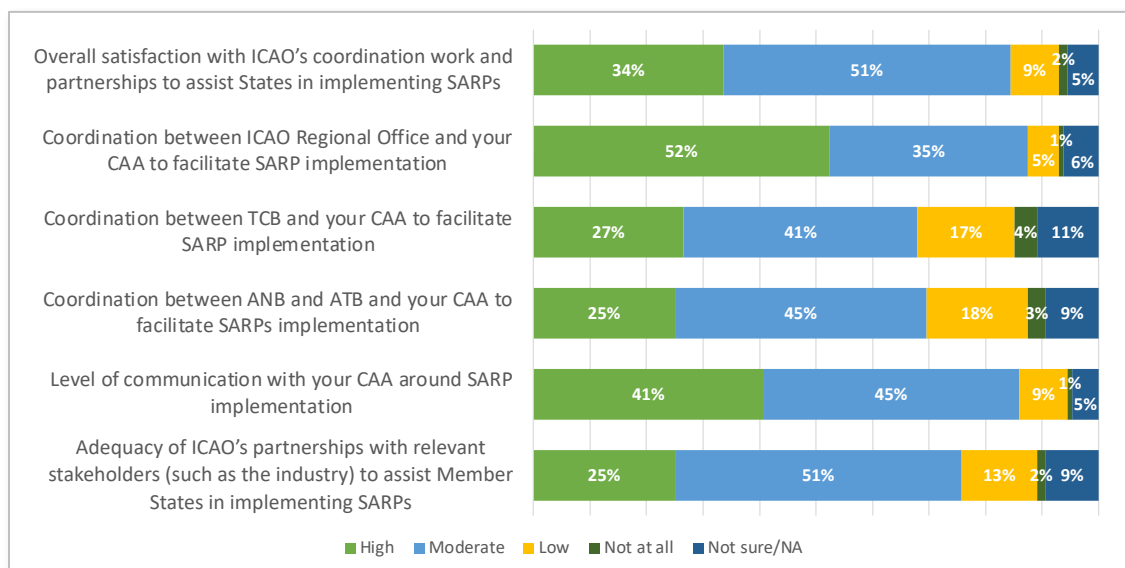
82. Most States (84%) positively rate ICAO's coordination work and partnerships to assist Member States in implementing SARPs. However, the coordination across key ICAO Bureaus and CAAs, as well as partnerships with the industry, is lower rated. For instance, 21% of countries think there is no-to-low coordination between ICAO Bureaus (ANB, ATB and TCB) and their CAAs to facilitate SARP implementation (Figure 6). Low perceptions around the level of coordination between ICAO Bureaus and CAAs are more pronounced among ESAF (38%), NACC (25%) and WACAF States (24%).

83. The coordination between ICAO Regional Offices and CAAs for implementation support is the highest rated, with over half (52%) of States rating it as highly satisfactory and over a third (35%) assessing it as moderately satisfactory. Yet, over half of States also think Regional Offices must do more to ensure States are compliant with ICAO SARPs (59%); to provide support to the States they are accredited to (57%); and to enhance cooperation and coordination among States and regional bodies and organizations (56%). As discussed earlier in paragraphs 78, 79 and 82, stakeholders also acknowledge that Regional Offices lack adequate resources to do more in these areas.³¹

"The [European Union (EU)] is mature in implementing SARPs. The EU is one of the biggest donors and supporters of technical assistance/support worldwide. Cooperation exists via the ASIAP mechanism, also attended by TCB. However, there is insufficient coordination with TCB, which may lead to overlaps and duplications. More coordination is needed to avoid duplications, inefficient distribution of resources and to provide complementary support to ICAO's programmes."

EUR/NAT States

Figure 6. Perceptions of Member States of ICAO's Coordination Work and Partnerships



Source: Survey on Needs and Expectations of Member States

³¹ A41-WP/261 EX/112

84. Partnering with the industry is identified as an opportunity to expand the quantity and quality of implementation support to the States, particularly in the context of ICAO's limited resources. In the survey, 15% of States rate ICAO's partnerships with relevant stakeholders—such as the industry—as of no-to-low adequacy (Figure 6). This perception is higher among NACC (25%) and EUR/NAT States (18%). Many stakeholders stress the feasibility of working more closely with the industry to better assist States in implementing SARPs.³² For instance, an ICAO Council Member comments: *"Implementation support is not sufficiently resourced by the main budget. We need an alternative mechanism, and the industry is one. It is already there but not well coordinated. ICAO can take on that coordination role."*

"[The industry] has tons of resources for implementation support. They even have offices in our region. ICAO can be the one identifying the needs and the projects to prevent undue influence, but then coordinate with the industry to help the States implement."

ICAO Regional Office Staff

85. While there can be concerns of conflict of interests when working with the industry, most stakeholders agree that implementation support is the right place for the industry to participate. Stakeholders highlight that the industry already provides direct technical assistance in many countries and that ICAO is well positioned to channel those resources and prevent undue influence. For example, an ANC Member comments: *"In so many countries, there is already a lot of financial assistance coming from the industry. ICAO cannot stop that, but it could coordinate the process and help balance any potential influence."* An APAC State shares: *"There is an understandable reluctance to involve the industry on the normative side, but it is viable to partner with the industry in terms of technical assistance. And you have to involve the industry because they know better what happens on the ground and are key actors in technology development."*

"On the normative side, we have clear firewalls to prevent undue influence from the industry. But when it comes to technical assistance and implementation support, the industry can be invited to assist. We certainly need procedures in place to avoid conflict of interests, but we shouldn't rule out this option."

SAM State

86. Stakeholders also think ICAO needs to explore alternative funding mechanisms that require strong partnerships and coordination with other actors, such as traditional financial institutions, development banks and multilateral organizations. Beyond removing pressure from ICAO's limited internal resources, alternative funding mechanisms are also seen as necessary to support States through major technological changes needed in the aviation sector, such as more environmentally friendly technologies.³³ In this regard, an ICAO Council Member says: *"When we think of the environment, we are talking about billions of dollars. This requires going to a different scale of resource mobilization. You need a more sophisticated funding machinery, including external resources."*

"ICAO is not engaging all key actors to maximize investments in implementation support. We need a funding system to [channel] funding from all parties from the beginning, including the financial community, the industry, TCB and governments."

Industry Partner

³² A41-WP/656 P/52; A41-WP/42 EX/20; A41-WP/47 EX/23

³³ A41-WP/47 EX/23

Finding 10: Member States and other stakeholders think that ICAO could better deliver implementation support by adopting a risk-based approach. ICAO should focus on implementing critical priorities first, as informed by State needs, resource limitations and technical capacities on the ground.

87. Stakeholders generally think ICAO's implementation support work should be more risk-based. This is because States are at very different stages of SARP implementation and have different levels of resources and technical capacity.³⁴ For instance, an APAC State shares: *"Our major challenge is the hardship of implementing all ICAO requirements, including the cost of implementation and the burden on human resources because we are only 4 people here. We can't keep up. ICAO requirements are important because aviation is about safety and security, but we have limited resources and low capacity. We can't address everything."*

"ICAO should have a different strategy for the top 10% of States who have capacity and another strategy for the bottom 10% who don't have the capacity. The strategy can't be the same for all. ICAO doesn't need to spend equally on all States."

NACC State

88. On the supply side of implementation support, stakeholders suggest leveraging existing internal and external data to inform a risk-based approach to assistance at the regional level. Through this approach, implementation requirements would be tailored to the needs and capacities of the region. An ICAO staff member explains: *"We could do more analysis by region to understand how many countries will be able to implement a standard. If only 2-3 countries can implement it, we then alleviate or give more time to the rest of the States in that region. We could have some differentiated implementation strategy depending on country capacity."*³⁵

89. Emphasizing that implementation support goes beyond financial resources and includes capacity building and technology transfer, stakeholders also describe a within-region approach whereby larger and better-resourced States support a single ICAO-coordinated and country profile-informed funding mechanism to facilitate implementation in smaller and less resourced States within their regions. Some stakeholders even suggest establishing a 'regional implementation score' to motivate the entire region to coordinate around SARP implementation progress for everyone.

90. While most stakeholders recommend a within-region approach, some stakeholders also suggest an across-region strategy. For example, stakeholders propose identifying large influx of tourists from large and well-resourced States from one region into smaller and less resourced States in other regions as a leverage point to request implementation support for the smaller, less resourced States. A NACC stakeholder explains: *"One country means business for another country. If one wealthy country has 3 million people flying into a poor State every year, the wealthy country can provide implementation support to the poor country. It is in its best interest to ensure that their 3 million people are landing there safely."*

³⁴ A41-WP/61 EX/30; A41-WP/270 EX/117

³⁵ A41-WP/60 EX/29

Finding 11: ICAO Trainings are generally assessed positively, with trainings on Safety being rated the highest and those in Economic Development the lowest. The cost of ICAO trainings/technical assistance and little focus on capacitating institutions are identified as barriers to greater and more sustainable capacity building.

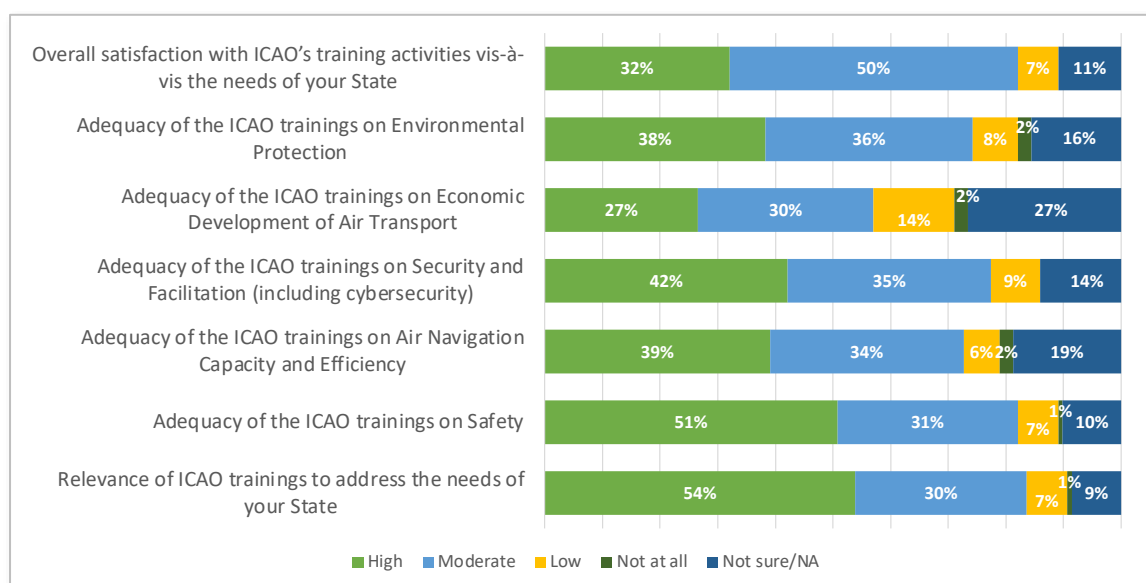
91. Most Member States rate ICAO trainings as highly/moderately relevant (82%), with nearly a third (32%) reporting high satisfaction and 50% reporting moderate satisfaction with training activities vis-à-vis their needs (Figure 7). States generally think the mix of online, virtual and in-person trainings is adequate (81%). When asked about the adequacy of the ICAO trainings across the five Strategic Objectives, the highest rated area is trainings on Safety (82%) and the lowest rated is trainings on Economic Development of Air Transport (57%). These trends are similar across ICAO Regions. In terms of the cost of trainings, the cost of Economic Development of Air Transport training is considered as the least adequate (62%).

"Effective capacity building is helping the State train its own people. This has not been done. [With ICAO's training approach,] you only get a few people trained here and there. Trainings and technical assistance from ICAO are also very expensive and many courses are not accessible to most States, especially GSI courses. This is why several States continue to lag behind implementing SARPs."

WACAF Stakeholder

92. Although Member States think the trainings are relevant to their needs, the cost and heavy individual-focus of ICAO trainings are mentioned as barriers to sustainable capacity building. Stakeholders generally feel that ICAO trainings are costly and out of reach for most developing States. Others highlight that ICAO trainings focus on capacitating individuals rather than institutions, with many suggesting the adoption of a train-the-trainer approach to ensure the sustainability of the capacities developed. For instance, an ESAF State shares: *"There should be more emphasis on capacitating institutions so that the benefits of [trainings and technical assistance] are more sustainable. They should focus on capacitating management, operational staff, everyone."*

Figure 7. Perception of Member States of ICAO's Training Activities



Source: Survey on Needs and Expectations of Member States

93. States identify Safety and Security/OPS as the top training priority areas for the next 2 triennia. These primarily include training around Government Safety Inspector (GSI), cybersecurity and UAS/RPAS.³⁶ Other areas where States would like to get more capacity building are related to risk assessments, environmental protection and Aerodromes and Ground Aids (AGA)—including aerodrome certification and aerodrome electrical systems.
94. The most useful ICAO resources and tools identified by Member States are the ICAO publications (81%), ICAO's public website (74%), the USOAP-CMA Online Framework (73%), the ICAO eLibrary (68%) and the Electronic Filing of Differences (EFOD) System (63%). States identify the TRIP Platform (28%), the PKD Secure Portal (27%), the ePassport Validation Roadmap Tool (27%), ICAO Data Plus (27%) and the Automated Border Control (ABC) Cost Benefit Analysis Tool (26%) as less useful.
95. When asked about the products and services delivered by TCB, most Member States selects its publications, e-commerce, print services and digital platforms (44%), procurement of goods and services (41%) and project management and financial monitoring (37%) as areas where TCB should maintain current levels of support. Areas where States feel that TCB could do more include training and capacity building (59%), provision of support through subject matter experts/consultants (55%), provision of support through national experts (54%) and support with implementation packages (48%). These results are generally similar across ICAO Regions. In interviews, some stakeholders raise concerns about the quality of the consultants used by TCB to deliver adequate technical assistance.

Finding 12: States think that ICAO's normative, monitoring/auditing and implementation support activities have not been aligned over the past 2 triennia. Little collaboration across ICAO Bureaus and increasing workload—coupled with a limited budget that has not increased in the past 16 years—are identified as key challenges for ICAO to effectively achieve its mandate and serve its member states .

96. Most Member States (57%) think that ICAO's standard-setting, monitoring/auditing and implementation support work has been somewhat aligned (Figure 8). These perceptions are more pronounced among ESAF (69%), EUR/NAT (64%) and WACAF States (59%). In survey comments and interviews, States highlight the lack of alignment around the timeliness across issuing standards, auditing compliance with the standards and providing support to States to implement standards. Working in technical silos and little collaboration across ICAO Bureaus is identified as a barrier to greater alignment across standard setting, monitoring/auditing, and implementation support activities. Stakeholders think this lack of internal coordination largely responds to overtaking Bureaus with increasing work, sometimes with requests that are not core to ICAO's mission.

97. More specifically, stakeholders mention the disparity between the increasing requests from the ICAO Council and the budget available to properly meet such demands as a key challenge. In their view, ICAO's current budget—the same since 2007—is not sufficient to properly conduct all work added over the past 16 years, including a significant shift and increase in work priorities during a global pandemic. For instance, an

"The timeline between standard setting, their monitoring as well as follow-up, e.g. implementation support activities, should be better coordinated in order for new SARPs to be implemented globally. Implementation support activities should be tailored to individual State needs to provide support where needed the most. Introducing these improvements could provide potential to contribute to strengthening civil aviation rules and set up a global levelled playing field."

EUR/NAT State

³⁶ A41-WP/240 EX/107; A41- WP/64 EX/33; A41-WP/74 EX/36; A41-WP/158 EX/72

ICAO staff member shares: *"We are not communicating and coordinating well across management precisely because everyone is trying to do more than what they can. We need to ask Member States what they need and then prioritize which of those needs we can realistically meet with the resources we have. But we can't meet every need. Our Bureau Directors and the Secretariat are often busier managing the Council and external partnerships than managing core business."*

98. Stakeholders think that this discrepancy is taxing on ICAO's human resources, setting out ICAO Bureaus and Regional Offices to produce organizational outputs and outcomes with limited sustainability. Many raise concerns on how this resource gap works against the Transformational Objective set out in the 2023-2025 Business Plan,³⁷ as well as against ICAO Strategic Objectives. For instance, an ICAO staff member comments: *"A lot of States, especially low-income countries, want ICAO to increase work in economic development. The first decision we made was not to have an economic development Deputy Director because we don't have money. So, we are going in the opposite direction."*

"The budget is a big challenge, but we need to look at it to ensure it is adequate. Otherwise, we put the Secretary General in trouble because he won't be able to deliver what he promised. The Transformational Objective is his top priority and we need adequate resources to deliver that objective."

ICAO Council Member

99. While stakeholders think that prioritizing key State needs, leveraging partnerships with key actors, and adopting a regional approach to providing core services to the States (i.e., implementation support) can help reduce this organizational resource gap, many indicate that a revision of the ICAO budget is imperative to effectively achieve its core mission. Otherwise, the organization would need to make substantial cuts of its current initiatives to adequately serve core State needs with the 2007 budget, stakeholders argue. They also point that a drastic reduction of current initiatives and programmes risks leaving out imminent work necessary to respond to upcoming challenges, such as technology adoption/transfer and capacity building related to environmental sustainability.

"The Strategic Objectives cover all the basics. The goal should be to prioritize within each of those objectives. [ICAO] can't address every single thing the States request. The Council should put emphasis on prioritizing and saying what ICAO cannot and will not do. If increasing the budget is not feasible, the other only way out is to prioritize."

APAC State

Finding 13: Member States identify overall implementation support, training and capacity building across all five Strategic Objectives as the top priority need for the coming 2 triennia. Safety, Security and Facilitation and Environmental Protection are the areas with the most needs. Training CAA technical personnel and providing support around cybersecurity are commonly mentioned priorities.

100. Most Member States (90%) list priority needs for the next 2 triennia in the areas of Safety and Security and Facilitation, followed by priorities related to Environmental Protection (85%). This trend is similar across ICAO Regions except for MID States, which list most of their priority needs in the areas of Air Navigation Capacity and Efficiency (88%) and Environmental

³⁷ [ICAO Business Plan 2023-2025](#).

Protection (88%). While Safety and Security and Facilitation remain leading areas of future priority needs for APAC and WACAF States, they list more priority needs around Air Navigation Capacity and Efficiency (APAC States) and Economic Development of Air Transport (WACAF States) than in Environmental Protection.

101. Regarding specific priority needs around Safety, most States request support to review and/or implement their State Safety Programme (SSP) and overall training/capacity building. The most common request is training and capacity building for States' technical personnel, particularly national inspectors and auditors. In other cases, States list training/capacity building around UAS/RPAS and the transport of dangerous goods by air.³⁸ States also request overall support around SARP implementation and compliance.
102. In terms of priority needs around Security and Facilitation, States primarily mention overall training/capacity building and cybersecurity. Regarding training and capacity building, States specify needing support to develop their Facilitation Programme; improve SARP compliance and/or implement Annex 9; train national instructors, inspectors and auditors; prepare for ICAO audits; and increase capacities around cybersecurity. In relation to cybersecurity, States generally request support to develop relevant cybersecurity practices/policies and additional guidance material around this topic. Other common priority needs include resource mobilization and investments around safety, technology adoption and interoperability, support to modernize or upgrade infrastructure and increasing the frequency of Facilitation Panels.³⁹
103. Around the area of Environmental Protection, core needs are related to SAF, decarbonization/CORSIA and overall training/capacity building. Most States list increased SAF availability and use, along with implementation support to developing States, as top needs for the next 2 triennia. Robust implementation of CORSIA and relevant ICAO LTAG to achieve decarbonization targets are also important priorities. States also ask for overall training and capacity building to improve SARP implementation, compliance and sustainability around environmental protection.⁴⁰
104. Regarding Air Navigation Capacity and Efficiency, most States mention overall training and capacity building as a priority need for the upcoming 2 triennia. Most training/capacity building requests are related to improving air navigation services, expanding the capacity of the CAA technical personnel and increasing competencies around the cyber-resilience of air navigation services. In other cases, States request support related to infrastructure upgrades, new entrants, trajectory-based operations (TBO) and integrated Communication, Navigation

"The future of aviation requires building back confidence in that aviation is the fastest connecting network, and that it is safe and secure. There are opportunities around innovation and greening aviation to make the process of flying easier and seemly, without compromising safety and security. Implementation support will be a huge task for ICAO because these topics are new ways of doing things."

ICAO Staff

³⁸ A41-WP/240 EX/107; A41-WP/354 EX/154; A41-WP/361 EX/159; A41-WP/578 EX/269

³⁹ A41-WP/300 EX/128; A41-WP/344 EX/146; A41-WP/354 EX/154; A41-WP/361 EX/159; A41-WP/578 EX/269; A41-WP/64 EX/33; A41-WP/158 EX/72

⁴⁰ A41-WP/432 EX/198; A41-WP/169 EX/76; A41-WP/495 EX/239; A41-WP/568 EX/266; A41-WP/495 EX/239; A41-WP/354 EX/154; A41-WP/361 EX/159

and Surveillance and Spectrum (iCNSS). Others also mention assistance around emerging technologies and artificial intelligence.⁴¹

105. In the area of Economic Development of Air Transport, priority needs are related to economic regulation/air services agreements, overall training/capacity building and air transport liberalization. States specifically list effective economic regulation of air transport as a top need, as well as developing a common understanding on how economic regulation/air services agreements can support other policies, such as SAF deployment. Training and capacity building for technical personnel is also recurrently mentioned, particularly for CAA staff in charge of economic and statistical aspects (e.g., air transport forecasting and cost-benefit analysis). Other States mention training on the development of related national regulations. Another important priority for States is increased market access and the liberalization of air transport. Based on experiences from the COVID-19 pandemic, enabling a crisis-resilient aviation system by establishing a comprehensive crisis preparedness framework is also mentioned as an important need.⁴²

106. Below is a summary of the most important priority needs and expectations identified by stakeholders for implementation support in the next 2 triennia:

Box 3. Summary of the Priority Needs and Expectations of ICAO Member States for Implementation Support in the Next 2 Triennia

- | | |
|--|--|
| <ul style="list-style-type: none"> • Prioritize areas for implementation support based on State needs, anticipate resources and funding gaps based on well-defined Country Profiles. • Reorganize ICAO's implementation support to make the support closer to Member States by transferring part of TCB functions to the Regional Offices • Rely less on consultants and use ICAO experts in the Regional Office for implementation support. • Expand the human and financial resources of Regional Offices based on number of States assisted and regional needs. | <ul style="list-style-type: none"> • Strengthen partnerships with the aviation industry to expand implementation support to States, as informed by Country Profiles. • Expand resource mobilization for implementation support through alternative funding sources, such as traditional financial institutions, development banks and multilateral organizations. • Increase implementation support and training across all Strategic Objectives but primarily around Security and Facilitation (cybersecurity), Safety (GSI and SSP implementation) and Environmental Protection (SAF and CORSIA). |
|--|--|

⁴¹ A41-WP/131 TE/42; A41-WP/237 TE/84; A41-WP/341 TE/135; A41-WP/12 EC/2; A41-WP/199 EC/14; A41-WP/553 EC/38.

⁴² A41-WP/300 EX/128; A41-WP/301 EX/129; A41-WP/76 EX/38; A41-WP/82 EX/43; A41-WP/145 EX/62; A41-WP/354 EX/154; A41-WP/361 EX/159; A41-WP/171 EC/12; A41-WP/409 EC/29

CONCLUSIONS

Conclusions

107. Conclusion 1: Member States are generally satisfied with ICAO's standard-setting, monitoring/auditing and implementation support work. However, ICAO lacks adequate mechanisms to systematically identify and prioritize State needs, preventing the organization from using financial and human resources more efficiently to address critical issues. The development of a well-defined Country Profile describing, among others, the context of aviation and priorities and pressing needs of a State, along with necessary resources and funding gaps, is considered a key missing tool to improve support to the States across all workstreams. (Linked to All Findings).
108. Conclusion 2: ICAO's current organizational structure somehow limits support to Member States and renders the alignment of standard setting, monitoring/auditing, and implementation support activities difficult. Key barriers to greater organizational effectiveness are the centralization of technical expertise at ICAO Headquarters, insufficient partnership with the industry and having under-resourced Regional Offices. Embracing a more risk-based approach across all three workstreams is identified as a more viable approach for States to focus on the implementation and sustainable compliance with critical priorities first, as informed by State-specific needs, resources limitations and technical capacities on the ground. (Linked to Findings 8, 9, 10 and 12).
109. Conclusion 3: Improving alignment across ICAO's normative, monitoring/auditing and implementation support work—as well as adapting the organization to imminent aviation challenges (e.g., climate change related impacts)—requires mechanisms for ICAO Bureaus and Regional Offices to push back and/or delay work demands not in line with State priority needs. In addition, a revision of the ICAO regular budget is imperative for the organization to achieve its core mission more effectively and better serve Member States in the next 2 triennia. (Linked to Findings 3, 5, 10 and 12).