



WORKING PAPER

ASSEMBLY — 40TH SESSION

TECHNICAL COMMISSION

Agenda Item 30: Other issues to be considered by the Technical Commission

POSTPONEMENT OF THE APPLICABILITY DATE FOR THE EXTENSION OF SAFETY MANAGEMENT SYSTEM (SMS) TO ORGANIZATIONS RESPONSIBLE FOR THE TYPE DESIGN AND/OR MANUFACTURE OF ENGINES AND PROPELLERS

(Presented by Canada)

EXECUTIVE SUMMARY

This working paper discusses the need to postpone the applicable date of 7 November 2019 for Amendment 1 to Annex 19 – *Safety Management*, which extends the applicability of an SMS to organizations responsible for the type design and manufacture of engines and propellers. The paper further examines the requirement to accommodate the needs of these organizations, while enabling them to efficiently manage change, manage growth, and maintain safety levels.

Action: The Assembly is invited to:

- a) note the work accomplished to date by industry in support of SMS implementation responsible for the type design and/or manufacture of engines and propellers;
- b) review the considerations noted in the paper and the effective date of 7 November 2019; and
- c) consider a revised effective date that will commensurate with efficient management of change and maintain safety levels during the implementation process;

<i>Strategic Objectives:</i>	This working paper relates to the Safety Strategic Objective.
<i>Financial implications:</i>	N/A
<i>References:</i>	Annex 19 – Amendment 1 to the <i>International Standards and Recommended Practices, Safety Management</i> Doc 9859, <i>Safety Management Manual (SMM)</i> 4 th edition State letter AN 8/3.1-16/16 dated 4 April 2016

1. INTRODUCTION

1.1 Annex 19 – *Safety Management* supports a proactive strategy to improve safety performance and Amendment 1 to Annex 19 enhances SMS provisions to support a consistent implementation, which includes restructuring and the extension of SMS requirements to organizations responsible for the type design and manufacture of engines and propellers.

1.2 Canada is dedicated to continuously improving its safety management practices. An implementation rate, for the organizations to which SMS has been extended through the Amendment, must be attuned to the needs of those organizations while also enabling them to efficiently manage change, manage growth, and maintain safety levels.

1.3 This paper discusses the need to postpone the applicable date of 7 November 2019 for Amendment 1 to Annex 19, which extends the applicability of an SMS to these organizations.

2. BACKGROUND

2.1 Amendment 1 to the *International Standards and Recommended Practices, Safety Management* (Annex 19 to the Convention on International Civil Aviation) was adopted by the Council at the eighth meeting of its 207th Session on 2 March 2016. On 4 April 2016, States were notified of the adoption of the Amendment through a State Letter (AN 8/3.1-16/16) which detailed that Council prescribed 11 July 2016 as the date on which it would become effective and listed 7 November 2019 as the date on which it will become applicable.

2.2 Amendment 1 arises from proposals developed at the first meeting of the Safety Management Panel (SMP/1), together with the fourteenth meeting of the Airworthiness Panel Working Group of the Whole (AIRP/WG/WHL/14) and the Safety Information Protection Task Force (SIP TF).

2.3 Some existing principles within Annex 19 were restructured with the intention to facilitate effective implementation. SMS provisions were enhanced to support uniform implementation, including the extension of SMS requirements to organizations responsible for the type design and or manufacture of engines and propellers.

3. EXTENSION OF SMS FOR DESIGN AND MANUFACTURING ORGANIZATIONS RESPONSIBLE FOR THE TYPE DESIGN AND/OR MANUFACTURE OF ENGINES AND PROPELLERS

3.1 Canada has been a world leader in SMS development and implementation. Since SMS was first introduced, Canada has faced many challenges and with those challenges gained valuable experience and insight in respect of SMS and implementing changes to the aviation program. For example, ensuring the concepts and principles of SMS balance safety and efficiency without placing an undue burden on an organization.

3.2 Complex operations, such as design and manufacturing organizations responsible for the type design and/or manufacture of engines and propellers, must go beyond implementing the component pieces of SMS; it is necessary for them to integrate and interrelate the component pieces completely in to the organization to achieve the desired results and must be carried out at an achievable pace.

3.3 Canadian organizations establishing SMS under the Amendment 1 extension have expressed great concern for the applicability date of 7 November 2019 and recommend that the date be postponed.

3.4 The fourth edition of the *Safety Management Manual (SMM)* (Doc 9859) which serves as guidance to States on the implementation of SMS, was anticipated to be released in July 2017, as noted in the State Letter (AN 8/3.1-16/16). The actual publication date was April 2018 and has therefore impacted the original course of implementation for many organizations.

3.5 Canada has been participating with its international counterparts on the industry-led SMS Steering Committee, which has developed an SMS standard for ‘Implementing a Safety Management System in Design, Manufacturing, and Maintenance Organizations’ (*SM-0001*). The international industry standard, intended to enable the aviation industry to implement a SMS consistent with Annex 19, followed on 17 September 2018. The publication of this document, only fourteen months before the effective date adopted by the Council, would give further indication that a postponement should be considered.

3.6 As the international aerospace community moves forward with recognizing SMS, not doing so at an implementation rate that is consistent among States may increase the risk of maintenance of confidence between international partners. In particular, organizations in which Canadian subject matter experts participate, such as the Certification Management Team (CMT) for the certification of design and manufacturing of aeronautical products, and other Civil Aviation Authorities (CAAs).

3.7 The Canadian economy and Canada’s international competitiveness will likely be impacted, particularly in the aerospace sector, if the effective date is not postponed for SMS in design and manufacturing organizations, where getting products to foreign markets may be adversely affected.

4. CONCLUSION

4.1 Canada believes that postponing the Amendment 1 effective date of 7 November 2019 as it relates to the extension of an SMS to organizations responsible for the type design and/or manufacture of engines and propellers will enable organizations to efficiently manage change and maintain safety levels during the implementation process.

— END —