



WORKING PAPER

ASSEMBLY — 40TH SESSION

EXECUTIVE COMMITTEE

Agenda Item 13: Audit Programmes – Continuous Monitoring Approach

USOAP-CMA READINESS PROGRAM

(Presented by Brazil)

EXECUTIVE SUMMARY

The paper presents the Brazilian experience in establishing an USOAP-CMA Readiness Program within the National Civil Aviation Agency - ANAC and the benefits that can be achieved by performing simulated USOAP-CMA audits. These initiatives enhance the awareness of the safety level, making the State's civil aviation system more secure over time.

Therefore, Brazil highlights the advantages of independent peer and self-assessment methodologies which can help States to have an updated view of their actual Effective Implementation level, not substituting ICAO's USOAP-CMA audits, but giving the opportunity to States to cooperate with each other, exchange mutual knowledge and experiences, contributing to avoid that their Civil Aviation System degrades to an unsafe level.

Action: The Assembly is invited to:

- a) recognize the benefits of the Universal Safety Oversight Audit Programme (USOAP) self-assessment and peer assessment, through the recognition of a Readiness Program and its results as a proactive methodology to prevent the States' safety level degradation;
- b) request the Air Navigation Commission to discuss guidelines for the development by the Member States of their Readiness Programs; and
- c) encourage the support among Member States for the conduct of simulated audits.

<i>Strategic Objectives:</i>	This working paper relates to the Safety Strategic Objective.
<i>Financial implications:</i>	No
<i>References:</i>	Doc 9859, <i>Safety Management Manual (SMM)</i> Annex 19 – <i>Safety Management</i>

1. INTRODUCTION

1.1 The ICAO Universal Safety Oversight Audit Programme (USOAP) Continuous Monitoring Approach (CMA) is an important tool for ICAO to assess its member states regarding their safety level of compliance. As ICAO is not able to assess its members on a regular basis, varying the time interval from country to country, States might get the impression that their last audit result is their most updated picture regarding their safety level.

1.2 The self-assessment methodology is a valuable tool for states to get the most updated picture regarding their safety levels, however it has its limitations. The self-assessment process can be contaminated by an internal view of the State, either because it can be too strict or even because it can be too permissive in its self-evaluation.

1.3 Last year, Brazil received the help and collaboration from Canada and France to perform an external evaluation of its self-assessment, resulting on a more independent result. This result brought light to ANAC's processes and legislation that can be reviewed and improved. This opportunity for improvement can take place before the next ICAO Audit occurs.

1.4 Brazil supports the development of independent peer and self-assessment methodologies that could help States to have an updated view of their actual Effective Implementation level, not substituting ICAO's USOAP-CMA audits, but giving the opportunity to States to cooperate with each other, exchange mutual knowledge and experiences contributing to avoid that their Civil Aviation System degrades to an unsafe level.

2. BACKGROUND

2.1 ANAC experience with the simulated audits carried on by an external evaluator.

ANAC's USOAP-CMA Readiness Program

2.1.1 In the year 2015, ANAC underwent an ICAO Coordinated Validation Mission (ICVM) to ascertain whether previously identified safety deficiencies have been satisfactorily resolved by assessing the status of corrective actions or mitigating measures.

2.1.2 In 2015, ANAC established a project (a unique initiative, with specific beginning and end, which demands the allocation of resources, aiming to create a product, service or exclusive result) to prepare the Agency and its departments to receive the audit. Despite the project, the preparation had a high cost to the Agency in terms of time and allocation of human resources to organize the responses and evidences needed to attend the audit.

2.1.3 After the audit, and willing not to go through the same stress as in 2009 and 2015, the Board of Directors established a Priority Project (a project defined by the Board Directors as of differentiated relevance for the achievement of strategic objectives for the Agency) with the main objective of institutionalize the USOAP-CMA program within the Agency.

2.1.4 The USOAP Institutionalization Priority Project had amongst its products the development of a Readiness Program that should be capable to keep an updated data base of answers and evidences regarding the USOAP-CMA Protocol Questions (PQs).

2.1.5 As an initial action, regarding the Readiness Program, an external evaluation of the USOAP Protocol should be done and ANAC was able, through a bilateral technical cooperation agreement, to have the assistance from the TCCA (Transport Canada – Civil Aviation) and from the French DGAC (Direction Générale de l'Aviation Civile) to carry out these simulated audits.

2.1.6 As a result of the simulated audits, ANAC achieved an Effective Implementation of 93,91%, against a 95,14% EI, evidencing the difference between the official result of the audits and the current condition of the Brazilian State concerning USOAP.

3. DISCUSSION

3.1 Benefits of self-assessment

PQ self-assessment

3.1.1 The Self-Assessment tool presented on the CMA Online Framework (OLF) is an important tool for the States to keep updated their knowledge on their own Status of Implementation.

3.1.2 Every civil aviation oversight system is an imperfect system and needs to be managed on its safety level. The self-assessment can be one of the tools that can increase the State level of consciousness about the actual level of safety regarding their civil aviation oversight system.

3.1.3 By knowing their current level of safety, States can update their answers to the PQs:

- a) that have been found as not satisfactory;
- b) that have been amended;
- c) that might be impacted due to changes on the civil aviation system (regulation, processes, procedures, organizational structure); and
- d) that might be impacted due to changes on the ICAO SARPs and on other ICAO regulation.

3.2 USOAP Readiness

3.2.1 A direct consequence of the self-assessment tool and its completion by the State members is the condition of readiness that the State is capable to get.

3.2.2 Being aware of its actual EI, the State can avoid that its Safety Level degrade to an unsustainable level that could have a high cost to recover.

3.3 USOAP Self-audits

3.3.1 In order to implement the Readiness Program, a Member State should establish an internal audit program capable of assessing its system.

3.3.2 This audit program should be able to evaluate the system as impartially as possible, resulting in an EI that is not influenced by a restrictive or permissive bias.

3.3.3 One possibility to mitigate the effect of bias, is to carry out audits between Member States, through bilateral agreements, with the sole aim of obtaining an independent view.

3.3.4 With this result, the State can become aware of what points should be taken into account for correction and update, such as: processes that need to be implemented; standards that no longer meet ICAO's requirements, and so on.

3.3.5 It should be noted that the results of internal audits, and even those carried out between Member States, are for the exclusive use of the audited State and are not intended to replace the results of the Official Audits of the USOAP-CMA Program.

4. **CONCLUSION**

4.1 Brazil believes that the establishment of a Readiness Program by the States can increase the awareness of the safety level, making the State's civil aviation system more secure over time.

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