



Item 2 Global and inter-regional activities
2.2 Implementation of safety management systems (SMS) in the CAR/SAM States

ICAO ACTIVITIES WITH REGARD TO STATE SAFETY PROGRAMMES (SSP) AND SAFETY MANAGEMENT SYSTEMS (SMS)

(Presented by the Secretariat)

SUMMARY

This working paper contains information about ICAO activities in connection to State safety programmes (SSP) and safety management systems (SMS), and the proposal of amendment on this matter. It also contains information about the progress made in the CAR/SAM Regions with respect to Key Activity A8 of the Strategic Objectives of the Organization, the progress made by States with regard to the SMS training programme, and the results of SMS activities.

References:

- ICAO Annexes 6, 11, and 14;
- ICAO Strategic Action Plan/Strategic Objective A 2005-2010: Safety/Key Activity A8 SMS;
- State Letter AN 12/51-07/74 dated 7 December 2007; and
- ICAO Safety Management Manual (Doc.9859).

1. Introduction

1.1 In 2004, the ICAO Council approved the ICAO Strategic Objectives for 2005-2010. Objective A, Safety, contains Key Activity A8: *to support the implementation in all States of safety management systems (SMS) in all safety-related disciplines.*

1.2 In order to accomplish Key Activity A8, ICAO and the Regional Offices have carried out a series of activities aimed at providing specific training courses on this matter to the States/Territories and International Organisations, using as a reference the ICAO Safety Management Manual and the official ICAO SMS course.

Progress made by ICAO on Key Activity A

1.3 At the fourth meeting of its 176th session, held on 25 October 2007, the Air Navigation Commission made a preliminary review of the proposal of amendment to Annex 1 — *Personnel Licensing*; Annex 6 — *Operation of Aircraft, Part I — International commercial air transport — Aircraft*, and Part III — *International operations — Helicopters*; Annex 8 — *Airworthiness of Aircraft*; Annex 11 — *Air Traffic Services*; Annex 13 — *Aircraft Accident and Incident Investigation*, and Annex 14 — *Aerodromes, Volume I — Aerodrome design and operations*, with a view to harmonising and expanding safety management provisions. The Commission reviewed the proposals of amendment and authorised their delivery to the contracting States and relevant international organisations for their comments. The proposal of amendment was circulated through AN 12/51-07/74 dated 7 December 2007.

1.4 The proposal is a follow up to the harmonisation of the provisions related to safety management contained in Annex 6, Parts I and III; Annex 11; and Annex 14, Volume I, initiated in 2005. In order to reinforce the safety management system concept, it is also proposed to extend it to Annexes 1, 8, and 13. The proposal revolves around the introduction of two frameworks: one for the implementation and maintenance of the State safety programme (SSP) and the other, for the implementation and management of a service provider safety management system (SMS). The amendments to the wording required to harmonise the Annexes in question are also included.

1.5 Regarding Annex 1, the proposal refers to the medical exam to be undergone by licence holders and the approval of training organisations that are exposed to safety risks while providing their services. Regarding Annex 6, Part III, the proposal introduces the requirement for helicopter maintenance organisations to implement a safety management system that is acceptable to the State. As to Annex 8, beyond the harmonisation of Part II with the safety management requirements contained in other Annexes, the intention is for it to serve as a basis for the drafting of the necessary guidelines as part of the future work of ICAO. Finally, concerning Annex 13, the proposal introduces the responsibility of conducting accident and incident investigations as part of the State safety programme.

1.6 The proposal includes an appendix describing a service provider SMS framework, to be included in Annexes 1, 6 (Parts I and III), 8, 11, and 14 (Volume I), as well as an attachment describing a State safety programme framework, which would be inserted in Annex 11, with reciprocal references in Annexes 1, 6 (Parts I and III), 8, 13, and 14 (Volume I).

1.7 Bearing in mind that the proposals of amendment imply a more in-depth harmonisation of the provisions contained in Annexes 6 (Parts I and III), 11, 13, and 14 (Volume I), the Commission has set 19 November 2009 as the target implementation date, and 18 November 2010 as the target implementation date for the proposed provisions of Annexes 1 and 8.

1.8 Furthermore, the information received from the States through the SMS training programme has revealed the need to amend the ICAO SMS Manual (Doc. 9859), a task that is under way.

Regional activities

1.9 During 2006 and 2007, the NACC Regional Office has offered two regional SMS courses, nine courses in the States and one seminar for General Directors of the CAR Region (in Spanish), to support SMS implementation.

1.10 By the end of 2007, a total of 377 specialists and 10 regional instructors had been trained to conduct SMS courses on behalf of ICAO. Courses were conducted in Cuba (October 2006), El Salvador (June 2007), United States (January 2007), Guatemala (February 2007), Mexico (February, April and September 2007), Costa Rica (August and September 2007), Dominican Republic (November 2007), Nicaragua (November 2007), Curaçao (December 2007), and Aruba (December 2007).

1.11 The ICAO NACC and SAM Regional Offices conducted the following SSP and SMS workshops:

- a) ICAO NAM/CAR/SAM workshop on safety management systems (SMS) for airport operators – Spanish (Buenos Aires, Argentina, 4-8 April 2005);
- b) First ICAO workshop on the implementation of the State safety programme (SSP) and safety management systems (SMS) (Lima, Peru, 17-19 October 2007);
- c) Workshop on the development of guidelines for the implementation of: 1) Phase 1 of the State Safety Programme; 2) Phases 1 and 2 of the ICAO SMS (Santiago, Chile, 7-1 April 2008).
- d) Third Workshop for the implementation of the State Safety Programme (SSP) for the Caribbean States, Mexico and Central America, and of Safety Management Systems for SMS service providers (Mexico, 22 to 24 April 2008), (see the document agreed by consensus in **Appendix C**).

1.12 As a result of the first workshops (item b) above) and following an extensive debate, the States expressed their opinion about the requirement for the development of a State safety programme and the approval and monitoring of the implementation of the key components of an SMS, and about the possible alternatives to overcome potential obstacles to the implementation of the key elements of both the SSP and the SMS. This information became an input for subsequent ICAO activities of assistance to the States regarding appropriate SSP and SMS implementation.

1.13 Regarding the workshop to develop implementation guidelines (see item c) above), the various administrations and, particularly, the experts responsible for implementing the SSP and the SMS gave their points of view, which subsequently served for the development of SSP and SMS implementation guidelines through the hiring of experts on this subject under Regional Project RLA 06/901 “*Implementation of a regional ATM system, taking into account the global ATM operational concept and the corresponding CNS technological support*”.

1.14 Likewise, the programme of regional SMS training courses has continued in Argentina (March and June 2007), Bolivia (August 2007), Brazil (September 2006) Chile (March and July 2007), Colombia (February and September 2007, August 2008 and scheduled for December 2008), Ecuador (September 2007 and August 2008), Panama (August 2006 and April 2007), Paraguay (August 2007), Peru (March 2007), Uruguay (December 2006) and Suriname/Guyana (March 2008). A total of 669 specialists and 12 regional instructors have been trained to date.

Future activities

1.15 In keeping with the provisions of the corresponding ICAO Annexes and the ICAO Safety Management Manual (Doc 9859), States shall establish safety programmes (SSP) and require that each certified aircraft operator, maintenance organisation, air traffic service provider, and aerodrome operator implement a State-approved safety management system (SMS).

1.16 The States have a tremendous responsibility in the establishment of a climate that favours safe and efficient aeronautical activities. To meet such responsibility, they may require additional assistance for the planning, initial operation, and implementation of the SSP and the corresponding safety management systems.

1.17 In summary, as a result of the activities carried out in the CAR/SAM Regions on this topic, it was possible to identify some of the potential obstacles to the implementation of the components and elements of a service provider safety management system (SMS), as well as for the implementation of the basic components and elements of the State safety programme.

1.18 The *Policy and safety objectives* component, and particularly, *aspects related to responsibility and commitment*, was considered as one of the main obstacles to implementation. In this respect, it was highlighted that one of the most significant obstacles was the lack of framework legislation, the existence of legal gaps that do not support the implementation of, or compliance with, the SMS, the lack of commitment by top management, insufficient allocation of resources (human, financial, logistic), and, in particular cases, the dual role of the State as regulator and service provider, etc.

1.19 Regarding these aspects, different actions were proposed, such as: the training of State regulatory teams; the clear definition of the responsibilities of all State bodies that participate in aeronautical activities, with a CAA-centred coordination system; sensitisation of State executive and legislative authorities; a gap analysis of basic legislation and legal provisions, and subsequent correction endorsed by top State levels; and a proper allocation of the resources necessary for programme implementation.

1.20 **Appendices A, B and C** to this working paper contain a summary of the obstacles found to the implementation of SSP and SMS components and different elements, the proposed solutions, the ICAO contribution to help resolve the identified obstacles to implementation, and, finally, some solutions agreed upon for each particular case.

1.21 Regional Offices will continue providing specific assistance, giving courses when so required, while the States shall assess their own training requirements in addition or supplementary to the activities being carried out on the subject in the region and, if appropriate, will request supplementary assistance from the Regional Offices for an effective SSP and SMS implementation.

1.22 Lastly, it should be recalled that GREPECAS formulated Conclusion 14/4 “SMS implementation and instructor training courses”, in which the States and International Organisations were requested to assign high priority to the implementation of such programmes; and, upon receiving training on safety management systems through the ICAO training programme, to designate instructors to continue with the training courses with a view to an effective SMS implementation in keeping with ICAO SARPs.

2. **Suggested action**

2.1 The Meeting is invited to take note of, review, and discuss this working paper and, if appropriate, express the need for specific supplementary training and/or additional regional planning requirements.

APPENDIX A

**First ICAO workshop on the implementation of the State safety programme and of safety management systems (SMS)
(Lima, Peru, 17 to 19 October 2007)**

STATE SAFETY PROGRAMME

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
<p>Objectives:</p> <ol style="list-style-type: none"> 1. Identify potential obstacles to the implementation of the components and elements of a Safety Management System (SMS) for service providers exclusively within the SAM region, and to the implementation of the basic components and elements of the State safety programme. 2. Discuss possible alternatives for overcoming those obstacles. 3. Propose courses of action to ICAO. 			
<p>State programme component: 1. State safety policy and objectives. Element: 1.1 CAA safety standards.</p>			
<ul style="list-style-type: none"> ➤ Lack of expertise to regulate the SMS. ➤ Scarce resources (human, financial, logistic, etc.) ➤ Ambiguity of responsibilities for aeronautical issues. ➤ Bureaucratic inertia, which slows down regulatory updating. ➤ Conflict and legal gaps do not support SMS implementation and compliance. ➤ The government structure hinders implementation of the State Safety Programme. ➤ The new legal framework is not properly disseminated. 	<ol style="list-style-type: none"> a) Train regulatory teams in how to regulate the SMS. b) Assign investment resources to the aeronautical sector. c) Clearly define the responsibilities of all State institutions that participate in aeronautical activities, using a CAA-centred coordination system. d) Raise the level of awareness of State executive and legislative authorities. e) Analyse gaps in basic legislation and legal standards and subsequently correct those gaps with the support of top-level State authorities. f) Legislate and regulate to create the regulatory framework. g) Establish procedures that contemplate dissemination channels. 	<ul style="list-style-type: none"> • Increased support for training in regulatory issues and continuous updating of SMS course material. • Issuing of SMSM guides that clearly define interfaces and responsibilities for the SMS concepts contained in Annexes 6, 11, and 14 and the responsibility of the investigating authority set forth in Annex 13. • Creation, together with the States, of a training option for top-level national, executive and legislative authorities. • Sensitising of top-level government authorities regarding the need for SMS implementation. • Development of a regulatory model containing the essential elements that the (SMS) standard should contain. 	<ol style="list-style-type: none"> 1. <i>Revision of Doc. 9859 (SMM)</i> 2. <i>SMS Workshop Programme and State safety programme for top executives.</i> 3. <i>See 2 above</i> 4. <i>See 1 above</i> 5. <i>See 1 above</i>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
		<ul style="list-style-type: none"> • The State safety objectives should cover the following topics: • Safety policy statement. • CAA operational legal framework for safety matters. • CAA safety philosophy. • CAA safety requirements and requirements for its implementation and operation. • CAA safety management goals and indicators. • The State safety programme should be implemented in phases over defined time periods; we recommend that it be presented in the form of a manual • Main safety objectives for a given time period. 	
<p>State programme component: 1. State safety policy and objectives. Element: 1.2 CAA safety responsibility.</p>			
<ul style="list-style-type: none"> ➤ Responsibilities are not clearly identified or defined in the CAA ➤ Lack of a gap analysis of responsibilities in the existing organic structure for the implementation of the State Safety Programme ➤ Lack of commitment and absence of the SMS concept and structure within the State 	<ul style="list-style-type: none"> a) Clearly establish the responsibilities and accountability of all CAA personnel. b) Allocate human, technical and financial resources. c) Formulate and incorporate the SMS structure within the State. 	<ul style="list-style-type: none"> • Successful solution and implementation models and guides in the SMSM 	<p>6. See 1 above</p>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
<ul style="list-style-type: none"> ➤ Lack of commitment on the part of the State (particularly of the CAA, to the fulfilment of the State safety programme). 			
State programme component: 1. State safety policy and objectives. Element: 1.3 Accident and incident investigation			
<ul style="list-style-type: none"> ➤ Subordination links or lack of independence between the investigator and the regulator. ➤ The investigation should not result in the attribution of blame or responsibility. ➤ Concurrent actions within the CAA and hierarchical dependence. ➤ The investigation bodies share the database with the other States. ➤ Sharing of results of State aircraft accident investigations involving common use aircraft operators (civil-military). 	<ul style="list-style-type: none"> a) Clearly establish the responsibilities and accountability of all CAA organizations involved. b) Promote the independence of accident and incident investigation by the CAA. c) Obtain/arrange for the necessary resources for the new structure. 	<ul style="list-style-type: none"> • Models and guides of successful solution in the SMSM. • Suggest/recommend the creation of a committee on accidents and incidents in the SAM Region. 	<ul style="list-style-type: none"> 7. See 1 above 8. Review through Regional Project
State programme component: 1. State safety policy and objectives. Element: 1.4 Compliance policies.			
<ul style="list-style-type: none"> ➤ Lack of alignment and continuity between policies and objectives because there is no shared vision about aeronautical issues among all decision-makers and support organisations. 	<ul style="list-style-type: none"> a) Gather decision-makers and sensitise them to aeronautical issues. b) Create appropriate legislation and regulations for SMS implementation. 	<ul style="list-style-type: none"> • Create, together with the States, a training option for top-level national, executive and legislative authorities. • Continue promoting an SMS culture. 	<ul style="list-style-type: none"> 9. See 2 above 10. Continue the awareness-raising work

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
<ul style="list-style-type: none"> ➤ Failure by most States to adopt an SMS compliance policy. ➤ Resistance to change. ➤ In reports received, difficulty in separating the concepts of safety deviations, minor violations, negligence, and intentional deviations (voluntary and mandatory reporting). 	<p>c) The State SMS programme should contemplate a CAA body responsible for the analysis and evaluation of compulsory and voluntary reports stemming from the SMS concept.</p>		
<ul style="list-style-type: none"> ➤ State programme component: 2. State safety risk management. ➤ Element: 2.1. Safety requirements for a service provider SMS. 			
<ul style="list-style-type: none"> ➤ Failure to promulgate the (aforementioned) compliance policy prevents the establishment of controls for service providers. ➤ Lack of integrated databases for the development of management indicators. ➤ Service providers are not familiar with the SMS. ➤ Lack of an initial analysis for identifying provider requirements. ➤ Lack of a safety culture (lack of training, punitive approach, resources, trained personnel, etc.) 	<ul style="list-style-type: none"> a) Promulgate a compliance policy and regulations. b) Establish a standard or interoperable reporting structure like ECCAIRS for information exchange and hazard detection. c) Establish a State SMS training programme for service providers. d) Work as a team with operators, instead of imposing unconsulted requirements. e) Change the culture through various communication, education, performance measurement, and technology and training standardisation mechanisms. 	<ul style="list-style-type: none"> • Development by ICAO of a guidance document for the creation of appropriate State Safety Programmes for each type of organisation. • Review of documents and steps for certifying service providers. • That ICAO urge States to require recertification of air service providers once they have adopted their SMS. • Plan for guides for the establishment of a standard or interoperable reporting structure like ECCAIRS in all of the States. 	<p><i>11. See 1 above</i> <i>12. Programme of ECCAIRS seminars.</i></p>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
State programme component: 2. State safety risk management. Element: 2.2. Approval of safety levels formulated by service providers.			
<ul style="list-style-type: none"> ➤ Lack of integrated databases for the establishment of acceptable safety levels. ➤ Lack of indicator parameters and of definition of acceptable limits. ➤ Safety level limits are not known. 	<ul style="list-style-type: none"> a) Generate knowledge for the establishment of acceptable safety levels. b) Keep safety records for trend analysis. c) The CAA needs a multidisciplinary working team to make predictive and trend analyses of the data collected and to propose changes to, and readjustment of “acceptable” safety levels. d) Establish a frame of reference for determining and standardising indicators. e) Build up and continuously promote a safety culture through technical publications. f) Change the culture through safety training, education and promotion at all levels of the organisation. g) Create a database in order to determine safety levels. 	<ul style="list-style-type: none"> • Production of guidance material to determine global safety levels. • Standardisation of parameters by type of service provider organisation. • Promotion of formal and specific courses for each service provider. 	<p>13. See 1 above.</p>
State programme component: 3. State safety assurance. Element: 3.1. Safety oversight (inspections, audits and surveys).			
<ul style="list-style-type: none"> ➤ Lack of specific SMS operational regulation and implementation policies, as well as of indicator parameters, minimum and maximum targets, and phased supervisory methodology. ➤ There is no database. 	<ul style="list-style-type: none"> a) Although the current system provides for oversight, SMS policies and regulations need to be promulgated and, subsequently, oversight procedures need to be adopted. b) Change the culture through safety training, education, dissemination and promotion at all organisational levels. 	<ul style="list-style-type: none"> • Production of guidance material. 	<p>14. See 1 above</p>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
<ul style="list-style-type: none"> ➤ Lack of a frame of reference ➤ There is no safety culture ➤ More human resources are needed. ➤ There is a need for qualified personnel to conduct inspections, audits and surveys. ➤ The existing oversight programmes are not in line with the SMS philosophy. 	<ul style="list-style-type: none"> c) Establish goals and objectives covering different levels. d) The CAAs should guarantee the necessary human and budgetary resources needed to sustain safety programmes. e) Evaluate and adapt existing safety programmes to the SMS philosophy. 		
<p>State programme component: 3. State safety assurance. Element: 3.2. Collection, analysis and exchange of safety data.</p>			
<ul style="list-style-type: none"> ➤ Lack of a standard format for data collection. ➤ There are no defined data exchange mechanisms. ➤ A culture of data reporting, keeping and updating is lacking. ➤ A team for conducting integrated data analyses is lacking. ➤ Lack of resources, a safety culture and a culture of information exchange and management between service providers and the State. ➤ The voluntary reporting systems that have been implemented do not work. 	<ul style="list-style-type: none"> a) Develop universal data collection formats. b) Establish means and procedures for the insertion and retrieval of information by the countries. c) Encourage a reporting culture. d) Have work teams for data and trend analysis who are experts in SMS issues. e) Institute appropriate regulation for protecting the identity of voluntary reports and consider the opportunity for encouraging and promoting these actions, seeking different means for receiving reports (e-mail). 	<ul style="list-style-type: none"> • Promote the creation of a database based on universal formats and procedures for inserting information and generating useful statistics. • Creation of a working group, maybe within GREPECAS, to conduct studies and submit proposals. 	<p><i>15 Programme of ECCAIRS seminars</i> <i>16. Review through Regional Project.</i></p>
<p>State programme component: 3. State safety assurance. Element: 3.3. Setting of priorities based on operational oversight data from areas of greatest concern or need.</p>			
<ul style="list-style-type: none"> ➤ Insufficient data and information for prioritising problems identified in some element of the structure. 	<ul style="list-style-type: none"> a) Collect data. b) Make focused audits. c) Include data analysis topics in training programmes. 		

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
<ul style="list-style-type: none"> ➤ Lack of trained personnel for data analysis and prioritisation of inspections, audits and surveys. ➤ Safety oversight programmes are not sufficiently integrated. ➤ There is no exchange of safety information between service providers and the CAA. 	<ul style="list-style-type: none"> d) Change the supervision methodology. e) Develop and integrate the various safety oversight programmes of the areas involved and the operators. f) Establish channels and responsible parties for data exchange (contact points). 		
<p>State programme component: 4. Promotion of safety by the State Element: 4.1. Internal training, communication, and dissemination of safety information.</p>			
<ul style="list-style-type: none"> ➤ Lack of plans, training, organisational culture, resources and instructors. ➤ No budgetary resources are available. ➤ Infrastructure is lacking. 	<ul style="list-style-type: none"> a) Develop plans and training courses, train instructors and manage the organisational culture safety campaign. b) Allocate budgetary resources for the dissemination and maintenance of an acceptable level of training and information management. c) Consider signing a regional agreement to expedite the unification of criteria, while promoting a cultural change through education. 	<ul style="list-style-type: none"> • Continue with, and increase the number of SMS training courses • Create an SMS task force in the SAM Region, as part of GREPECAS. • Consider the possibility of signing regional projects to finance the cost of SMS implementation in the region through other organisations, such as with the World Bank, the IDB, and others. 	<p>17. See 10 above 18. Review through Regional Project</p>
<p>State programme component: 4. Promotion of safety by the State. Element: 4.2. External training, communication and dissemination of safety information.</p>			
<ul style="list-style-type: none"> ➤ Lack of plans, training, organisational culture, resources and instructors among service providers. ➤ No budgetary resources are available ➤ Infrastructure is lacking 	<ul style="list-style-type: none"> a) Develop plans and training courses, train instructors, and manage the organisational culture safety campaign. b) Allocate budgetary resources to disseminate and maintain an acceptable level of training and information management. 	<ul style="list-style-type: none"> • Continue with, and increase the number of SMS training courses. 	<p>19. See 10 above</p>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
	c) Consider signing a regional agreement to expedite the unification of criteria, while promoting a cultural change through education.		

APPENDIX B

**First ICAO workshop on the implementation of the State safety programme and of safety management systems (SMS)
(Lima, Peru, 17 to 19 October 2007)**

SAFETY MANAGEMENT SYSTEMS (SMS)

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
<p>Objectives:</p> <ol style="list-style-type: none"> 1. Identify potential obstacles to the implementation of the components and elements of a Safety Management System (SMS) for service providers exclusively within the SAM region, and to the implementation of the basic components and elements of the State safety programme. 2. Discuss possible alternatives for overcoming such obstacles. 3. Propose courses of action to ICAO. 			
<p>Component: <i>Safety policy and objectives</i> – Element: 1.1. <i>Responsibility and commitment</i></p>			
<ul style="list-style-type: none"> ➤ Lack of legislation to serve as a frame of reference. ➤ Top management commitment ➤ Allocation of resources. ➤ Duality of the State as regulator and service provider. ➤ Administrative changes not based on technical criteria. 	<ol style="list-style-type: none"> a) Request that States promulgate the necessary legislation. b) Request ICAO to develop a frame of reference. c) Allocation of resources. d) Plan for sensitising top management (on issues like: costs, company image, financial loss, etc.) under ICAO guidance and in coordination with the States in each region. e) Company audits to determine the level of organisational culture; define the professional profile of the person responsible for SMS; once the State has its SMS plan, companies should abide by those regulations. 	<ul style="list-style-type: none"> • ICAO should recommend that countries appoint a person with appropriate education and training, capacities and skills to head the service provider. • ICAO should prepare guidance material to help States differentiate between the traditional and the performance-based system. • Prepare additional material about the expected duties of each function of the course example, complementary to those of the SMM. • ICAO may require training programmes for top management and make recommendations about their content. • Obtain and disseminate information about service providers that have earned money from SMS implementation. 	<ol style="list-style-type: none"> 1. <i>Develop guidance material for States on:</i> <ol style="list-style-type: none"> a) <i>the difference between prescriptive and performance-based safety</i> b) <i>defining safety profiles, functions and responsibilities in an organisation</i> c) <i>the economic benefits of SMS</i> 2. <i>Implement a programme of SMS workshops for top management.</i> 3. <i>See 7</i>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
	<p>f) The company should have a defined and approved budget available for establishing and maintaining its SMS programme; this represents an investment and not an expenditure, as described in item a).</p> <p>g) Internal and external SMS monitoring and control audits; facilitation of procedures for companies with a high level of organisational culture.</p> <p>h) Consider the SMS as an investment and not an expenditure.</p> <p>i) The profiles of responsible personnel should be defined in the regulations and appropriate training provided by the authorities and ICAO.</p> <p>j) Develop various communication programmes among enterprises, their components, and with other users or service providers.</p> <p>k) Professional awareness.</p> <p>l) Training.</p> <p>m) State air navigation policy.</p> <p>n) Commitment – accountability.</p> <p>o) Explain the differences between SMS and the State accident investigation system at national seminars.</p>	<ul style="list-style-type: none"> • Ask ICAO to expand audit protocols specifically for the SMS. • Have ICAO help define safety duties and responsibilities of the various aeronautical infrastructure and service providers. • Support of experts to countries in teaching SMS courses. 	

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
	<p>p) Redefine manuals of functions of those responsible for safety.</p> <p>q) Redefine the safety structure of the organisation, using as an example the structure presented in the latest version of the ICAO SMS course.</p> <p>r) Awareness-raising events for top management in pyramid form.</p> <p>s) Provide information about what some providers have gained through SMS implementation.</p> <p>t) Strive for a State budget allocation to service providers that are part of the State.</p> <p>u) Standardisation of safety policy.</p> <p>v) Safety education and dissemination.</p> <p>w) State regulations that clearly define responsibilities.</p> <p>x) Clear regulations defining profiles.</p>		

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
Component: Safety policy and objectives – Element: 1.2. Safety responsibility of managers			
<ul style="list-style-type: none"> ➤ Lack of legislation to serve as a frame of reference. ➤ Lack of awareness-raising at management levels. ➤ Job profiles have not been defined. ➤ Lack of continuity. 	<ol style="list-style-type: none"> a. Establish the essential requirements of the standard. b. Define clearly and in legal terms the responsibility of management for safety in the areas under its jurisdiction. c. Include operational aspects in the manual of managerial functions. d. Courses for providers and clearly defined State regulations. e. Training and regulation. 	<ul style="list-style-type: none"> • Inclusion of ICAO guidance on documentation and regulation in the SMSM. 	4. <i>Revision of Doc. 9859 (SMM)</i>
Component: Safety policy and objectives – Element: 1.3. Designation of key safety personnel			
<ul style="list-style-type: none"> ➤ Lack of trained personnel. ➤ Internal conflict over the evolution of accident investigation for the SMS. ➤ Adequate salaries. ➤ Allocation of the necessary resources. 	<ol style="list-style-type: none"> a) SMS courses conducted in the various areas of responsibility. b) More frequent courses and updates. c) Standard material. d) The State or ICAO should train personnel with the appropriate profiles. e) Establish clear internal communication procedures. f) Define the profiles of key safety personnel according to the type of enterprise. g) Create incentives for the assumption of these new responsibilities. h) Clear definition of profiles by the State. 	<ul style="list-style-type: none"> • Delivery of guides on the required competencies (profiles). 	5. <i>See 1 above.</i>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
Component: Safety policy and objectives – Element: 1.4. SMS Implementation Plan			
<ul style="list-style-type: none"> ➤ Promotion of a culture for change. ➤ Personnel competencies. ➤ Standard material available for the States (ICAO). ➤ Lack of manuals for each organisation (ATS, AD, OPERATORS, MAINT.ORG). ➤ Lack of a safety organisational structure. ➤ Struggle among the internal powers of the institution to head a project that shows itself to be power producing. ➤ Administrative changes not based on technical criteria. ➤ Duality of the State as regulator and service provider. ➤ Lack of political will on the part of providers. ➤ Lack of clarity for classifying service providers by size and on that basis determining whether or not to require an SMS. ➤ Lack of an SMSM to serve as a model to be required of service providers. 	<ul style="list-style-type: none"> a) Promotion of a culture of change. b) Personnel competence. c) Top management commitment. d) Standard material available for the States (ICAO). e) Put in order the State SMS that seeks to measure and supervise each phase of implementation. f) Courses, seminars, fora, communication events, and training. g) Establish a classification with unified criteria. h) States should have a clear solution that will enable small service providers to obtain advisory assistance from the aeronautical authority (at a low cost). i) Clearly-defined State regulations. j) Training in the preparation of implementation plans. 	<ul style="list-style-type: none"> • ICAO should explain better how State supervision combines with phased SMS implementation. • ICAO should define the forms of SMS implementation according to the organisations and operations (large and small organisations, regular and charter operations), and service providers (domestic and international aerodromes and maintenance stations). • ICAO should provide the elements for unifying criteria for the classification of service providers (small/large organisation). • ICAO should recommend the establishment of State advisory groups to train and advise small providers. • Inclusion of models and guides in the SMSM. 	<ul style="list-style-type: none"> 6. <i>Revision of Doc 9859 (SMM)</i> 7. <i>Evaluate through a regional project the assistance given to States in the Region for the development of State safety programmes and the implementation of the corresponding SMSs.</i> 8. <i>Develop guidance material for States on the SMS implementation plan.</i>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
<ul style="list-style-type: none"> ➤ Difficulty of small operators in implementing an SMS. ➤ Concepts proposed within the SMS are not clearly defined (including titles of SMSM contents). 			
Component: Safety policy and objectives – Element: 1.5. Coordination of the Emergency Response Plan			
<ul style="list-style-type: none"> ➤ Lack of legislation to serve as a frame of reference. ➤ Lack of teamwork. ➤ Lack of harmonised plans. ➤ Lack of coordination with other State institutions. ➤ Lack of training and drill plans. ➤ No boundaries defined between the service provider and the State as the provider of aeronautical infrastructure. ➤ Lack of coordination among the various parties responsible for emergency response. ➤ Emergency plans are generally considered to involve only aircraft emergencies. ➤ No coordination among the various plans. 	<ul style="list-style-type: none"> a) Promulgate legislation as a frame of reference. b) Teamwork. c) Harmonised plans. d) Coordination with other State institutions. e) Training and drill plans. f) A broader plan covering all aeronautical activities should be in place. g) The State should foster an integrated emergency response plan, establishing guidelines for integrating aeronautical and airport systems with the other emergency systems of the country. h) Regulations and requirements for implementing the plan. i) Memoranda of understanding (letters of agreement). 	<ul style="list-style-type: none"> • Inclusion of models and guides in the SMSM. 	9. See 6 above.

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
Component: Safety policy and objectives – Element: 1.6. Documentation			
<ul style="list-style-type: none"> ➤ Drafting and dissemination of the corresponding manuals. ➤ Lack of competencies for the drafting and handling of documents. 	<ul style="list-style-type: none"> a) Drafting and dissemination of the corresponding manuals. b) Proposal by the State of thematic contents for service provider documents. c) Document containing indicator parameters. d) Create State Safety Programmes. e) The State should unify definitions. f) Development and management in accordance with the methodology of quality management systems, adding key safety management concepts and avoiding duplication. 	<ul style="list-style-type: none"> • ICAO should propose a better-defined documentary structure with a clearer and more precise and specific guidance. • ICAO should prepare a guidance manual on how to prepare and submit an SMSM. • ICAO should list the basic items to be considered in developing the State Safety Programme. • Include two elements in part (1. safety policy and objective): a) safety effectiveness indicators, and b) safety objectives. • As an additional element: SMSM manual curriculum. 	<p><i>10. Develop guidance material for States on the drafting of the SMS Manual (SMSM).</i></p> <p><i>11. See 6 above</i></p> <p><i>12. See 10 above</i></p>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
Component: 2. Safety risk management – Element: 2.1 Hazard identification process			
<ul style="list-style-type: none"> ➤ Lack of a safety culture at all levels. ➤ Lack of training of SMS skilled personnel. ➤ Punitive approach applied to reporting . ➤ No unified formats for submitting reports. ➤ Lack of documented procedures (established, documented, implemented and maintained) (traceability). ➤ Lack of competencies for identifying hazards. ➤ Lack of a standard reporting structure for detecting hazards. ➤ The law is not clear enough: it should be neither so permissive that it allows the same mistake to be committed several times, nor so coercive that it allows the reporter to be punished. ➤ Voluntary and confidential reporting systems generally do not offer legal protection for the reporting party. 	<ul style="list-style-type: none"> a) Change in culture within organisations. b) Continuous dissemination. c) Determine performance indicators. d) Documentation and standardisation of regulations and training. e) Disseminate and standardise voluntary and mandatory reports, and implement information systems, preferably automated on the basis of universal parameters. f) Clearly regulate and distinguish mistakes from violations. Reports of any kind should not be punitive. g) Offer training in hazard identification. h) Establish a standard reporting structure like ECCAIRS for the exchange of information and identification of hazards. i) Each State should establish legal definitions to encourage this type of reporting. 	<ul style="list-style-type: none"> • ICAO should advise and intervene in the unification of reporting formats and the parameters each kind of report should contain, according to the type of service provider organisation and in the establishment of compulsory implementation of automated information systems. • ICAO should continue to promote non-punitive reporting and report acknowledgment. • ICAO should make use of the contractual prerogatives granted to it so that the signatory States will make the appropriate legal changes or adjustments to implement this solution. • ICAO should validate and disseminate a user-friendly ADREP-based reporting system. 	<p><i>13. Review available material and, if necessary, develop additional guidance material on formats for event reporting forms.</i></p> <p><i>14. Resolution A36-9</i></p> <p><i>15. Programme of ECCAIRS courses.</i></p>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
Component: 2. Safety risk management – Element: 2.2 Risk assessment and mitigation process			
<ul style="list-style-type: none"> ➤ Unknown capacity for risk mitigation analysis. ➤ Lack of coordination among institutions that must ➤ Identify, mitigate and eliminate risk factors. ➤ Difficulty on the part of the service provider to eliminate the hazard that involves the other risk providers. ➤ No definition of acceptable risk level and limits, as well as no definition of indicator parameters. ➤ Obsolescence of the air fleet and of CNS/ATM and airport technology. ➤ Lack of definition of courses for assessment and mitigating of aeronautical risk. ➤ Failure to update regulations in accordance with new SMS concepts and the new technologies. 	<ul style="list-style-type: none"> a) Change in culture within organisations. b) Continuous dissemination. c) Determine performance indicators. d) Documentation and standardisation of regulations and training. e) Definition of the mathematical model for determining the acceptable level through the definition of indicator parameters. f) Encourage the formation of multidisciplinary committees from different organisations. g) Establish regulations requiring multi-organisation participation. h) Technology update programme involving the replacement of airport, air fleet and maintenance infrastructure, and the renewal and introduction of new technologies. i) Programmes to train in new technologies. j) Regulations should be continuously updated. k) Training programme in risk evaluation and mitigation. 	<ul style="list-style-type: none"> • ICAO could create the mathematical model as well as basic indicator parameters by type of service provider. • Include an element in part 2). Safety risk management; include the compliance of State safety levels. 	<p><i>16. Development of guidance material for States on safety performance indicators and targets.</i></p>

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
	l) Monitor the quality and coverage of course topics and the capacity of trainers and instructors. m) Gap analysis).		
Component: 3. Safety assurance – Element: 3.1. Safety performance monitoring and measurement			
<ul style="list-style-type: none"> ➤ Lack of a frame of reference for determining indicators. ➤ Lack of a database for tracing management. ➤ Lack of a safety culture. ➤ Measurement parameters not defined. ➤ Difficulty in obtaining data. ➤ Difficulty in interpreting data. Lack of indicators. ➤ Lack of financial and human resources for the service provider to do self-monitoring. ➤ Lack of a standard to measure achievements against approved goals. ➤ Need to follow up on the different systems in order to determine the progress and maturity of the system itself. ➤ Lack of safety studies. ➤ Lack of surveys. 	<ul style="list-style-type: none"> a) Establish the frame of reference for determining and standardising indicators. b) Develop and continuously disseminate the safety culture through technical publications targeting all levels of the organisation. c) Change in culture through training, education and promotion of safety at all levels of the organisation. d) Implementation of a data capture system. e) Training and exchange among providers. f) Benchmark. g) Establish basic criteria for the design of indicators in each area of interest. h) Form a working team responsible for monitoring. 	<ul style="list-style-type: none"> • Publication of a framework for States with minimum indicator requirements. • Replace the name of part 3) Safety assurance by: Safety guarantee. • Assist the countries in the region with SMS implementation through a safety task force. • Encourage the exchange of data and the conduction of safety studies within organisations of the same kind in the region. 	<ul style="list-style-type: none"> 17. See 16 above 18. See 7 above 19. See 15 above

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
	i) Establish standard coding to check the attainment of objectives and find disconformities based on a checklist. j) File the resulting data in statistical form for historical comparison purposes and adjust the system to its actual conditions. k) Foster the conduction of safety studies based on identification through gap analysis. l) Develop survey formats to help discover discrepancies and disconformities, and the consequent publication of results.		
Component: 3. Safety assurance – Element: 3.2. Managing change			
<ul style="list-style-type: none"> ➤ Lack of a frame of reference for defining indicators. ➤ Lack of a database for tracing management. ➤ Lack of a safety culture. ➤ Resistance to change, which is typical of Latin American culture. 	a) Change in culture through training, education and promotion of safety at all levels of the organisation. b) Training. c) State requirement for the establishment of processes to manage changes in providers.	<ul style="list-style-type: none"> • Models and guides in the SMSM. 	20. See 16 above
Component: 3. Safety assurance – Element: 3.3. Continuous improvement of the safety system			
<ul style="list-style-type: none"> ➤ Lack of a frame of reference for defining indicators. 	a) Establishment of goals and objectives covering different levels.	<ul style="list-style-type: none"> • Promote more forcefully the creation of a group for risk assessment. 	21. See 7 above

Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
<ul style="list-style-type: none"> ➤ Lack of a database for tracing management. ➤ Lack of a safety culture. ➤ Complacency and lack of improvement opportunities. ➤ Failure to appoint personnel to identify changes and change risks. 	<ul style="list-style-type: none"> b) Establishment of clearly defined and attainable goals. c) Implementation of internal and external audits. d) Multidisciplinary team to identify and analyse changes and describe mechanisms to control the risks generated by changes. e) Have mechanisms for the storage of historical data. f) Implement changes when detecting a significant event. 	<ul style="list-style-type: none"> • Share data from other countries that are significant for continuous improvement in the region. 	
Component: 4. Safety promotion – Element: 4.1. Training and education			
<ul style="list-style-type: none"> ➤ Lack of standards. ➤ Lack of economic resources. ➤ Lack of a safety culture. ➤ Lack of training at all levels of the organisation. ➤ Lack of commitment (high cost of failure to produce while training). ➤ Lack of human resources. ➤ High turnover. 	<ul style="list-style-type: none"> a) Training at all levels of the organisation. b) Allocation of the resources needed to attain goals and objectives. c) Establishment of standard regulations. d) Creating awareness, which is not a cost, but an investment. e) The State should promote and convene safety awareness-raising events for top management. f) Studies of workloads by competencies, roles and responsibilities. 	<ul style="list-style-type: none"> • Indoctrination courses for top management. 	22. <i>See 2 above</i>

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Obstacles	Proposed solutions	ICAO contribution	Agreed solutions
Component: 4. Safety promotion – Element: 4.1. Training and education			
<ul style="list-style-type: none"> ➤ Lack of essential safety information ➤ Lack of State SMS instructors to train service providers ➤ Lack of a safety culture at top management levels 	<ul style="list-style-type: none"> a) Provide training at all levels of the organisation. b) Allocate the necessary resources to attain goals and objectives. c) Provide motivation and incentives for a change in culture in the enterprise. d) State regulation to promote service provider communication processes. 	<ul style="list-style-type: none"> • Models and guides in the SMSM. • Development and conduction of on-line SMS courses. 	<p>23. See 6 above</p> <p>24. See 7 above</p>
Component: 4. Safety promotion – Element: 4.2. Safety communication			
<ul style="list-style-type: none"> ➤ Lack of essential safety information. ➤ Lack of State SMS instructors to train service providers. ➤ Lack of a safety culture at top management levels. ➤ Lack of adequate communication channels (vertical and horizontal) within the organisation. ➤ Information monopolisation for the benefit of individuals and not the organisation. 	<ul style="list-style-type: none"> e) Provide training at all levels of the organisation. f) Allocate the necessary resources to attain goals and objectives. g) Provide motivation and incentives for a change in culture in the enterprise. h) State regulation to promote service provider communication processes. i) Establish channels and feedback for the dissemination of results obtained from the SMS. j) Disseminate information. 		



**ICAO Regional Workshop on Safety Management Systems (SMS) and State Safety Programme (SSP) Implementation
(Mexico City 22 to 24 April 2008)**

Obstacles	Proposed solutions	ICAO contribution	Agreed results
Safety Management System (SMS)			
Objectives:			
<ol style="list-style-type: none"> 1. To identify potential obstacles on the implementation of Safety Management Systems (SMS). 2. To discuss possible alternatives to overcome these obstacles. 3. To propose courses of action to ICAO. 4. Any other relevant aspects 			
Component: 1. Safety policy and objectives – Element: 1.1 – Management commitment and responsibility			
Lack of commitment. (Culture)	Safety promotion-Educate and Create awareness through workshop/seminars, circulars and directives. Put Regulations and Enforcement in place.	Provide Training and workshop Provide Quick Reference of ICAO material.	1. Develop an SMS briefing package for States and industry to be delivered during initial SMS implementation 2. Develop a technical guidance
Lack of Resources (person and Financial)			-----
Component: 1. Safety policy and objectives – Element: 1.2 – Safety accountabilities of managers			
Culture (many short comings that become the norm)	Regulations, Enforcement and Education.	Provide Training and workshops. Provide Quick reference Material	1. Develop an SMS briefing package for States and industry to be delivered during initial SMS implementation 2. Develop a technical guidance
Component: 1. Safety policy and objectives – Element: 1.3 – Appointment of key safety personnel			



Lack or trained/qualified personnel	Provide Training, Create awareness of the organisation/profession – news letter etc.	Provide Specific Training E.g. Hazard & Risk	<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety</i>
Culture –not providing training.	Promote Safety culture.		-----
Component: 1. Safety policy and objectives – Element: 1.4 – SMS implementation plan			
• Lack of management commitment.	Put Regulations and Enforcement in place.	Provide Template as example. Workshops. Promote best practice. (Guidance material).	<i>Develop a template for an SMS implementation plan</i>
Lack or trained/qualified personnel	Create awareness of the organisation/profession – news letter etc.	Organise Training /workshop.	<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety</i>
Lack of financial resources	Seek funding.		-----
Culture –not providing training.	Promote Safety culture.		-----
Component: 1. Safety policy and objectives – Element: 1.5 – Coordination of emergency response planning			
➤ Bringing together the heads of the org.	Promote awareness- -Succession Planning	Workshops/ seminars	<i>Develop a template of a coordination protocol</i>
➤ Having different personnel attending meetings /workshops-no continuation.	Put Regulations and Enforcement in place. Create awareness – news letters	Workshop/seminars. Templates	<i>Develop a template of a coordination protocol</i>
➤ Culture – (non safety culture)	Promote Safety culture - Safety training including Human factors.		-----
Component: 1. Safety policy and objectives – Element: 1.6 – Documentation			
➤ Lack of appropriate personnel (technical and standardised writing skills)	Out source for trained and experienced personnel. Training of own personnel	Provide specific Training (workshops)	<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety personnel</i>



➤ Lack of Circulation and awareness.	Use of Internet and other forms media		-----
➤ Lack of Financial Resources.	Seek funding and sponsorship.		-----
Component: 2. Safety risk management – Element: 2.1 – Hazard identification processes			
➤ Lack of knowledge and awareness (Identifying, measuring, and Managing)	Training -Collecting and analysing data.	Ask states to encourage through Workshops and Seminars.	<i>Develop technical guidance specific for safety personnel involved in hazard identification</i>
➤ Lack of reporting culture (taking things for granted)	Safety Awareness. Create mandatory reporting		-----
➤ Current punitive Culture	Just Culture attitude from management. (Encourage, reward –remind-- clear line bet acceptable and Unacceptable behaviour.		-----
Component: 2. Safety risk management – Element: 2.2 – Risk assessment and mitigation processes			
➤ Resource personnel (trained)	Management to provide specific training		-----
➤ Availability of relevant Data	Technology, Training and Regulations		-----
➤ Lack Technology.	Investment		-----
➤ Reactive culture rather than Predictive /Proactive.	Promote awareness to be proactive /predictive.	Seminars and Workshops	<i>Include in amendment of Doc 9859</i>
Component: 3. Safety assurance – Element: 3.1 – Safety performance monitoring and measurement			
➤ Lack of Trained Personnel	Provide specific training		<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety personnel Foster a dissemination campaign regarding the use of electronic accident and incident reporting systems (ECCAIRS)</i>
➤ Lack of checklist	Make checklist available		<i>Same</i>

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➤ Inconsistency of scheduling for monitoring	Plan effectively		Same
➤ Lack establish standard for measuring.	Establish standards using published data from international bodies. Each state is required to calculate the acceptable level of movements, incursions against a calculated amount of movements. E.g.: total weight of FOD removed from ramp per movements.		Same
Component: 3. Safety assurance – Element: 3.2 – The management of change			
➤ Resistance to change. (Fear of the unknown), lack of information, guidelines	Educate-Training/workshop		<i>Develop specific technical guidance on the processes and procedures regarding the management of change</i>
➤ Cost – (Training, technology, procedures, more personnel)	Working with other organisation/s.		Same
Small organisation (limited resources)	Working with other organisations/s		Same
Component: 3. Safety assurance – Element: 3.3 – Continuous improvement of the SMS			
➤ State companies /organisations having to work alone and having Limited resources	Need for cooperation amongst organisations to work together (lending support.)		-----
Component: 4. Safety promotion – Element: 4.1 – Training and education			
➤ Lack of Funding	Pooling resources – Companies/ Organisations		<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety personnel</i> <i>Develop a procedures manual for the use of CAA inspectors when conducting oversight of service providers SMS</i>



➤ Lack of qualified personnel (Trainers)	Outsourcing. Develop a cadre of Trainers		<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety personnel</i> <i>Develop a procedures manual for the use of CAA inspectors when conducting oversight of service providers SMS</i>
➤ Culture – Not eager to develop in new knowledge.	Promote awareness-Workshop/ Seminars.		-----
➤ Procrastination	Promote change culture awareness.		-----
Component: 4. Safety promotion – Element: 4.2 – Safety communication			
➤ Procrastination	Promote Positive Culture awareness		-----
➤ Lack of news letters			-----
➤ Lack of resources	Cooperative effort amongst organisations		-----
➤ Culture of safety	Promote safety culture awareness.		-----
➤ Dialect Issue.	Need for trained Interpreters		-----

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Obstacles	Proposed solutions	ICAO contribution	Agreed results
<p>State Safety Programme (SSP)</p>			
<p>Objectives:</p> <ol style="list-style-type: none"> 1. To identify potential obstacles on the implementation of State Safety Programme (SSP). 2. To discuss possible alternatives to overcome these obstacles. 3. To propose courses of action to ICAO. 4. Any other relevant aspects 			
<p>Component: 1. State's safety policy and objectives – Element: 1.1 – CAA safety standards</p>			
<p>➤ Foreign control – Some islands are still under the control of a Sovereign country. (Sovereign Authority)</p>	<p>Need to work with the Sovereign Authority to put in place.</p>		<p>-----</p>
<p>➤ Problem- Roles and functions</p>	<p>To be made clear through Training and awareness.</p>		<p><i>Include in the amendment of Doc 9859</i></p>
<p>➤ Publication of safety targets, standards and methodology for development of SMS manuals</p>	<p>Utilization of current best practice and standards used by other regulatory authorities</p>		<p><i>Include in the amendment of Doc 9859</i></p>
<p>➤ Non Availability of Trained personnel who will be responsible for the development of SSP</p>	<p>Outsourcing (short term) and Training for long term.</p>		<p><i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety personnel</i> <i>Develop a procedures manual for the use of CAA inspectors when conducting oversight of service providers SMS</i></p>
<p>➤ Knowledge or Lack of awareness of SSP</p>	<p>Need for Workshop/Seminars to promote awareness.</p>		<p><i>Include in the amendment of Doc 9859</i></p>

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<ul style="list-style-type: none"> Ch 3 of 9859 is inadequate in providing guidelines. 	Need for clear guidelines	To provide quick reference or more and clear guidelines	<i>Include in the amendment of Doc 9859</i>
Component: 1. State's safety policy and objectives – Element: 1.2 – CAA safety responsibilities and accountabilities			
➤ Lack of resources and Training	OJT with foreign states. Use of consultants or expertise or Locally with experienced staff.		<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety personnel Develop a procedures manual for the use of CAA inspectors when conducting oversight of service providers SMS</i>
➤ Not having clearly defined roles and responsibilities- Job description.	To ensure clarity of roles and responsibilities through Workshop/Seminars. Should be document		<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety personnel Develop a procedures manual for the use of CAA inspectors when conducting oversight of service providers SMS</i>
Component: 1. State's safety policy and objectives – Element: 1.3 – Accident and incident investigation			
➤ Lack of Specific Training	Specific Training to be arranged.		-----
➤ Lack of experience	Need to be involved in Accident Investigation. Observers -(even if its neighbouring country)	Encourage states to allow other states involvement.	<i>Internal ICAO coordination</i>
➤ Lack of Guidance Manuals	To be written		-----
<ul style="list-style-type: none"> Lack of Financial resources 	Seek Funding, or cooperate with other States in order to minimise the costs.	Encourage cooperation with other states.	<i>Internal ICAO coordination</i>
Component: 1. State's safety policy and objectives – Element: 1.4 – Enforcement policy			
➤ Lack of Resources-lack of training	Seek assistance for training from other states	Workshop / Seminars	<i>Develop a technical guidance on enforcement policy</i>
➤ Political Pressures	CAA should have the power to enforce. Seek to amend the ACT.		-----

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➤ Inadequate regulations-do not addresses the violations.	Need to revise / update regulations.		-----
Component: 2 State's safety risk management – Element: 2.1 – Safety requirements for service providers SMS			
➤ Lack of regulations that include SMS implementation	Revise/ Update regulations to accommodate SMS implementation.		<i>Develop SMS model regulation</i>
➤ Lack of Guidance material	Use Guidance material provided by ICAO and other states.	Provide clear and quick reference guidance.	<i>Include in amendment of Doc 9859</i>
Component: 2 State's safety risk management – Element: 2.2 – Approval of service providers acceptable levels of safety			
➤ Standards are not clear	To be clarified or make standard measurable.		<i>Include in amendment of Doc 9859</i>
➤ Inadequate guidance material	Provide Clear guidance		<i>Include in amendment of Doc 9859</i>
➤ Lack of trained personnel preparing and reviewing documents.	Provide Training in the Guidance and Standards to be met.		<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety personnel</i>
Component: 3. State's safety assurance – Element: 3.1 – Safety oversight			
➤ Insufficient Personnel	Need to employ more personnel		-----
➤ Lack of financial resources	Seek funding or cooperate with other states to minimise to states.		-----
➤ Inconsistent scheduling	Clearly define periodic scheduling.		-----
➤ Lack of timely amendments	Assign responsibility (with dead lines)		-----
➤ Inadequate / insufficient checklist t (Job Aids)	Use ICAO manuals as Guidance, and best practice from other states.		<i>Develop a procedures manual for the use of CAA inspectors when conducting oversight of service providers SMS</i>
Component: 3. State's safety assurance – Element: 3.2 – Safety data collection, analysis and exchange			

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➤ Non availability of a system (to collect, analyse and exchange data)	Develop and implement a system.	Provide Guidance material	<i>Foster a dissemination campaign regarding the use of electronic accident and incident reporting systems (ECCAIRS)</i>
➤ Non use of the Technology	Provide and make use of Modern Technology		<i>Foster a dissemination campaign regarding the use of electronic accident and incident reporting systems (ECCAIRS)</i>
➤ Lack of resources (Human and Financial)	Budget, seek sponsors or work with other states to minimise costs.		<i>Foster a dissemination campaign regarding the use of electronic accident and incident reporting systems (ECCAIRS)</i>
➤ Non compatible formatting of data	Standardise		<i>Foster a dissemination campaign regarding the use of electronic accident and incident reporting systems (ECCAIRS)</i>
Component: 3. State's safety assurance – Element: 3.3 – Safety data driven targeting of oversight on areas of greater concern or need			
➤ Non availability of Data	Develop and implement a system.	Provide Guidance material	<i>Foster a dissemination campaign regarding the use of electronic accident and incident reporting systems (ECCAIRS)</i>
Component: 4. State's safety promotion – Element: 4.1 – Internal training, communication and dissemination of safety information			
➤ Lack of resources (human and financial)	Budget, seek sponsors or work with other states to minimise costs.		<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety personnel</i>
➤ Non use of technology	Provide and make use of modern technology		<i>Foster a dissemination campaign regarding the use of electronic accident and incident reporting systems (ECCAIRS)</i>
➤ Lack of official reporting system	Establish and implement official reporting system.		<i>Foster a dissemination campaign regarding the use of electronic accident and incident reporting systems (ECCAIRS)</i>

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Component: 4. State's safety promotion – Element: 4.1 – External training, communication and dissemination of safety information			
➤ Lack of resources (human and financial)	Budget, seek sponsors or work with other states to minimise costs.		<i>Develop a technical guidance including curriculum and contents of the appropriate training for key safety personnel</i>
➤ Non use of technology	Provide and make use of modern technology		<i>Foster a dissemination campaign regarding the use of electronic accident and incident reporting systems (ECCAIRS)</i>
➤ Lack of official reporting system	Establish and implement official reporting system.		<i>Foster a dissemination campaign regarding the use of electronic accident and incident reporting systems (ECCAIRS)</i>

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