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WORKING PAPER

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Agenda Item 9 Other Business

INITIATIVE FOR THE DEVELOPMENT OF A SECURITY PROGRAMME MODEL FOR AIRPORT OPERATORS

(Presented by Brazil)

EXECUTIVE SUMMARY

This working paper presents an initiative of the Brazilian civil aviation authority related to the creation of an Airport Security Programme model (ASP) with the purpose of simplifying the process of development, analysis and approval of this programme when submitted by airport operators and make it become an effective tool that contributes to the improvement of the AVSEC level.

Action:	Suggested actions are presented in Section 4.
Strategic Objectives:	Security & Facilitation
References:	Annex 17

1. Introduction

1.1 Annex 17 to the Chicago Convention (1944) establishes the need to prepare a security program by the airport operator, to comply with the NCASP guidelines of the country where the airport is located. Among the rules described in Annex 17, Standard 3.2.1 stands out:

3.2.1 Each Contracting State shall require each airport serving civil aviation to establish, implement and maintain a written airport security programme appropriate to meet the requirements of the national civil aviation security programme.

1.2 The purpose of this study note is to present to the AVSEC/FAL Regional Group an initiative that was developed in Brazil as a way of seeking compliance with this standard.

2. Development, analysis and approval process of the airports' security programme

2.1 Since 2004, the Brazilian guideline for the preparation of the airports' security programme has basically contained the structure and the minimum content of the programme, maintaining compatibility with the security programme model provided by ICAO Security Manual (Doc 8973, appendix 13, 9th edition - 2014).

2.2 The airport operators use these guidelines to develop and submit their security programmes for analysis and approval of the Civil Aviation Authority (CAA). In recent years, the Brazilian CAA has identified some difficulties in the process of development, analysis and approval, among which the following stood out:

- a) the period between the submission of the first version of the programme to the CAA and the effective publication of the administrative act approving the document resulted to be too long, mainly due to two factors:
 - i. the extensive reading phase that is demanded from the CAA's employee to complete all document evaluation; and
 - ii. the time spent by the airport operator to review the programme in order to comply with the various necessary corrections to make it compatible with the AVSEC standards, and therefore acceptable to the CAA, both in terms of document structure and procedures described.
- b. the perception that the document, when finally approved, did not provided the required improvement at the AVSEC level, partly due to the absence of brevity and clarity in the security procedures contained in the programme. The approved programs used to be copies of the AVSEC regulation, with few specific features of each airport.

2.3 Considering this context, the Brazilian CAA identified the need for the development of a normative instrument capable of reaching the following goals:

- a. Making the process of development, analysis and approval of the security programme easier and faster.
- b. Providing a practical guidance material to work as:
 - i. a security programme model that could be adopted partially or entirely by airport operators, containing the State guidelines of the security procedures for the industry;
 - ii. a reference material for the oversight work of civil aviation inspectors of the Brazilian CAA.

2.4 As abovementioned, the Brazilian CAA aims to simplify the process of analysis and approval of existing security programmes. This simplification consists in making the submission of documents to the CAA more standardized, enabling more efficient document analysis.

2.5 The resources saved in the analysis and approval of the programme can be applied in continued monitoring of the activities executed by the airport operators, aiming to assure an effective improvement in aviation security level.

3. The method adopted to eliminate the deficiencies of the process

3.1 The Brazilian CAA aimed to achieve the objectives mentioned above through three basic documents: the NCASP; a National Regulation directed to airport operators (RBAC 107) and a Supplementary Instruction containing the security programme model.

3.2 Currently, Brazil has a NCASP approved by presidential decree, establishing AVSEC responsibilities of each organization of the civil aviation system as well as guidelines for the sector in relation to the protection of civil aviation against acts of unlawful interference.

3.3 Considering the NCASP, the Brazilian CAA published the Brazilian Civil Aviation Regulation nº 107 (RBAC 107), containing the aviation security requirements (preventive security and contingency measures), applicable to the airport operators.

3.4 Then, a Supplementary Instruction nº 107 (IS 107) that describes the procedures that will be accepted by the Brazilian CAA for compliance with each requirement in RBAC 107 was prepared.

3.5 Besides, the Brazilian CAA created a similar project to air operators in 2013 (RBAC 108 and IS 107-001), presented on the Third Regional Group Meeting of the AVSEC/FAL, which was used as a parameter to create the similar to airports.

3.6 The procedures described in IS 107 correspond to the preventive security and contingency measures and compose the ASP model (Airport Security Programme model) that may, in some cases, be used without any change by the airport operator. Besides that, the IS 107 presents a form model, which should be fulfilled by the operator, with several piece of information about the airport, inter alia, names of the AVSEC managers, surveillance solutions, security equipment deployed in the airport and models of permits used to access the airside.

3.7 More than one acceptable method of compliance were described by the Brazilian CAA for some of the requirements in RBAC 107, providing alternatives to the airport operator, which can evaluate possibilities considering their operational characteristics and the infrastructure available. About this feature of the IS 107, the different possibilities of security checkpoint design and resources are examples of innovations brought to the Brazilian regulation.

3.8 The **Appendix** to this working paper presents some extracts from the ASP model in order to illustrate the programs' structure.

3.9 Any changes made in the ASP model by an airport operator must be clearly identified in the index of the document submitted to the Brazilian CAA, allowing the CAA experts to read only the procedures that contain different wording. Moreover, each change made by the operator must be justified and described with the details needed to the approval.

3.10 It should be noted that these proposed changes in procedures submitted by airports may be used in the future by the Brazilian CAA to review the regulations, always with the goal of enabling the adoption of best security practices at airports.

3.11 It is emphasized that when writing the preventive security and contingency procedures, the Brazilian CAA sought to follow the recommended practices by the ICAO Security Manual (Doc 8973, 9th edition) as well as solutions already adopted by national airport operators and others countries. Therefore, it is expected that most of the airport operators start to adopt ASP model with few changes, in the same way as it occurs since 2012 in AOSP analysis and approval process.

3.12 Finally, it is important to mention that the procedures proposed as options for compliance with the RBAC 107 requirements, although based on practices and common procedures as well as widely recognized by the civil aviation industry, are not the only ways to check conformity with regulation. In this regard, other ways may also be appropriate to achieve the objectives of RBAC 107 and can be proposed in the PSA to the Brazilian CAA. If approved, they can be adopted by airport operators.

4. Suggested actions

4.1 The Meeting is invited to:

- a. evaluate the methodology adopted by Brazil, analysing the advantages and disadvantages in its application and exchange experience in this subject to assess the viability to develop a common standard security programme in the region; and
- b. propose the development of a study to establish a secure way to change documents/regulations under secret distribution between states in the region, allowing greater access to AVSEC techniques and procedures to enhance AVSEC security levels and standardization in the region.

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APPENDIX EXTRACTS OF THE ASP MODEL

In the examples below, firstly it is presented an extract of the form that the airport operator must fill as part of the ASP. Secondly, it is presented an extract of the requirements of RBAC 107, followed by the acceptable procedures to achieve compliance.

Example 1 - AVSEC form that the airport operator fulfil in IS 107-001 to produce the Airport Security Programme (ASP)

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AIRPORT AVSEC DATA FORM (Part 4) ZONING CLASSIFICATION OF OPERATING AREAS					
				AREA AND FACILITIES	CLASSIFICATION
				Aircraft parking apron of commercial or charter flights (specify the apron if there is more than one at the aerodrome).	Security Restricted Areas (SRA) or Controlled Areas (CA), according to F.12.23
Boarding area for passengers in commercial or charter flights between the secure checkpoint and the aircraft (specify the room if there is more than one at the aerodrome).	Security Restricted Areas (SRA) or Controlled Areas (CA), according to F.12.23				
Baggage handling area for commercial or charter flights (specify the area if there is more than one at the aerodrome).	Security Restricted Areas (SRA) or Controlled Areas (CA), according to F.12.23				
Cargo processing area or air mail for commercial or charter flights (specify the room if there is more than one at the aerodrome).	Security Restricted Areas (SRA) or Controlled Areas (CA), according to F.12.23				
Supply processing area for commercial or charter flights (specify the area if there is more than one at the aerodrome).	Security Restricted Areas (SRA) or Controlled Areas (CA), according to F.12.23				
Cleaning materials processing area for commercial or charter flights (specify the area if there is more than one at the aerodrome).	Security Restricted Areas (SRA) or Controlled Areas (CA), according to F.12.23				
Aircraft parking apron for air taxi operations or general aviation (specify the apron if the is more than one at the aerodrome).	Indicate CA or SRA, according to internal evaluation				
Area of water supply facilities, energy and aviation fuel (specify the area if there is more than one at the aerodrome).	Indicate CA or SRA, according to internal evaluation				
Air navigation aid facilities (specify the installation if the is more than one at the aerodrome).	Indicate CA or SRA, according to internal evaluation				
Delete or add rows in the table, considering the operational reality of the aerodrome and its own denomination of areas, buildings and facilities.	-				

Example 2 - RBAC 107 Content

107.65 Vulnerable Point

(a) The airport operator must to identify the vulnerable points, located inside or outside the patrimonial airport perimeter, indicating these areas on the airport plan, so that allow a clear identification of these points.

(1) The identification of these points must include, at least, air navigation facilities, water, fuel and electricity supply, and runways or taxiways that pass over public roads.

Corresponding Content in IS 107 – Security Procedures

F.16 VULNERABLE POINTS

107.65 (a) Identification and Security Zoning

F. 16.1 The airports areas and facilities that, if damaged or destroyed, affect the regular airport operation are designated as vulnerable point by the airport operator.

F.16.2 The vulnerable point designations are made based on the currently regulation, on the risk assessment carried out by the airport operator, and on the Airport Security Committee coordination, when this is required.

F.16.3 The identification of vulnerable points, inside or outside the patrimonial airport perimeter, and their localization are identified on maps describe on de AIRPORT AVSEC DATA FORM.

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