A35-WP/152 EX/64, TE/20 23/09/04 English, French and Spanish only¹

ASSEMBLY - 35TH SESSION

EXECUTIVE COMMITTEE AND TECHNICAL COMMISSION

Agenda Item 16: Improvement of safety oversight

Agenda Item 16.2: Transition to a systems approach for audits in the ICAO Universal Safety

Oversight Audit Programme (USOAP)

Agenda Item 24.1: Protection of sources and free flow of safety information

AIRPORT SAFETY OVERSIGHT

(Presented by Airports Council International)

SUMMARY

ACI has consistently supported the extension of the ICAO Universal Safety Oversight Audit Programme to airports from the inception of this programme by ICAO. ACI has a long-standing involvement in fostering improved safety at airports, believing that safety is paramount for the sound development of air transport and airports, regardless of whether they are publicly or privately owned. ICAO should continue to consult ACI on all matters related to safety at airports.

ICAO should also invite all States to introduce regulatory provisions obliging aircraft operators to report all incidents and accidents occurring at airports (including apron areas) to the appropriate authorities and to airport operators, who can then take action to improve safety. ACI supports confidential or privileged, "no-fault" collection of data, and agrees with the draft Assembly Resolution on protection of information from safety data collection systems. Assembly action is presented in paragraph 14.

INTRODUCTION

- 1. ACI continues to support the expansion of the ICAO Universal Safety Oversight Audit Programme, with the resultant programme of audits of States related to Annex 14 and airports planned to commence. It is an important step by ICAO, and one which has great potential impact in harmonizing the approach of States to the safety regulation of airports.
- 2. It is important to airport operators that this extension of the safety oversight programme is carried out effectively. In this respect, ACI wishes to bring several concerns to the attention of the ICAO Assembly and Secretariat. It is also important that ICAO continue to consult ACI on developments related to safety at airports, including the extension of safety audits, aerodrome certification, and safety management systems, to ensure input on practical matters from airport operators.

¹ English, French and Spanish versions provided by ACI

3. New provisions in Annex 14, Volume I, which became applicable in November 2001, included new Standard 1.3.1, stating: "As of 27 November 2003, States shall certify aerodromes used for international operations in accordance with the specifications contained in this Annex as well as other relevant ICAO specifications through an appropriate regulatory framework". ACI agrees with the principle of certification in accordance with ICAO Standards. However, in the context of the ICAO programme of safety audits for airports, Recommended Practices, for airport design should not become "de-facto" Standards for airport operation, since they do not have the same status as Standards, may be difficult to apply to existing airports (notably those concerned with airfield dimensions), and are not based on a defined and consistently-applied "target level of safety".

ACI ACTIVITIES RELATED TO AIRPORT SAFETY

- 4. ACI has a long-standing involvement in fostering improved safety at airports. This activity commenced with safety on apron areas, and has been expanded to cover the entire movement area of airports. Current ACI activities include:
 - a) monitoring of apron safety at member airports world-wide, by means of an annual survey of accidents and incidents, now in its 18th year. More than 400 airports participated in the 2002 survey. The survey's results and related commentary have been progressively expanded to make them more informative;
 - b) holding of ACI Airport Operational Safety Conferences, the most recent in Dubai in 2003 with another to be held in Prague on 15-17 November 2004. These well-attended events have proved valuable in disseminating expert knowledge and "best practices". The proceedings of these conferences form an increasing body of documentation available to member airports and other interested parties;
 - c) production of ACI handbooks on safety. The second edition of the ACI Apron Safety Handbook, published in 1996, contains a list of safety recommendations and guidelines for airports. The first edition of the ACI/IATA Apron Markings and Signs Handbook was published in April 2001, with input from ICAO and IFALPA.
 - d) contribution to ICAO's activities, including the ICAO Airport Design Study Group, Visual Aids Panel, Frangible Aids Study Group, and Rescue and Fire Fighting Study Group;
 - e) providing advice to ICAO on safety implications in the development of ICAO technical standards for airport design, construction and operation,;
 - f) liaison with IATA, IFALPA, FSF and other international organizations on safety-related issues.
 - g) establishment and promotion of new ACI policies. The current (2003) edition of the ACI Policy Handbook includes many new and revised policies on airport design, operations and safety management;
 - h) review of airport safety deficiencies. When any such deficiencies have been reported to ACI, ACI encourages dialogue between all concerned at the local level, with the aim of improving the level of safety;

i) provision of training courses in co-operation with IATA since the beginning of 2004, e.g. on Airport certification, Airport ground handling operations.

AERODROME CERTIFICATION

- 5. ACI also provided comments on the ICAO Manual on Certification of Aerodromes (Doc. 9774), and would appreciate the opportunity for full participation in the future development of new SARPs and related documents such as the ICAO Manual on Safety Management for Aerodrome Operators, which is in preparation. ACI's aim is to ensure that all possible safety measures are implemented and that the resources expended will provide the greatest safety benefit.
- 6. Patterns of regulatory oversight differ considerably between countries. ACI is concerned that some States' regulatory authorities apply all the provisions of Annex 14, even the Recommended Practices, as mandatory conditions for all aircraft operations at existing airports, not just for the design of new airport facilities. In ACI's view, the Recommended Practices in Annex 14 should not be made mandatory, since many of them are simply recommendations for the design of new aerodromes, and are not required to regulate aircraft operations. For those parts of Annex 14 used for safety regulation, the concept of a "target level of safety" should be used, where appropriate, to determine consistent operational safety standards and procedures.
- 7. Airport ownership structures and statutes differ significantly between countries and individual airports. However, under all types of ownership, the separation of regulatory oversight from day-to-day management is highly desirable, as this should ensure greater clarity and definition in the regulatory regime. Where there are deficiencies in airport safety oversight, ACI will endeavour to support ICAO's world-wide efforts, for example by applying "best practice" guidelines. However, it must be understood that most airport operators are not responsible for: a) air navigation (the responsibility of airlines and pilots); b) air traffic control services (the responsibility of ATC providers); or c) safety regulation and oversight (the responsibility of States).
- 8. ACI believes that regulatory systems should be efficiently and even-handedly administered, and should avoid imposing additional costs and administrative burdens which are disproportionate to the potential gains. Fees charged for licensing and certification should be kept to a minimum and should not exceed the cost of providing the service. Also, the responsibility of the airport operator should be clarified with respect to third parties, such as fixed base operators, since, within a safety management systems approach, the airport operator plays an important co-ordinating role with respect to overall safety, even in areas where it is not responsible for service delivery. Regular communication between the regulator and the airport operator is essential, and a single point of contact on licensing issues is preferable.

TARGET LEVEL OF SAFETY APPROACH TO DESIGN

9. In 1998, the ACI General Assembly adopted a resolution which stated that ICAO SARPs and aeronautical studies, especially those related to aerodrome separation criteria and geometry of movement areas, should be based on an assessment of the appropriate "target" level of safety, using the best available analytical methods for risk assessments. Since 1998, ACI has urged ICAO to initiate and support a comprehensive and scientific examination of the underlying rationale for the calculation of minimum airport dimensions (based on the appropriate aircraft dimensions, plus clearance distances/ safety buffers). This would ensure that SARPs fully reflect the research, technology, knowledge and experience of airport operators, aircraft operators and aircraft manufacturers in maintaining safety., ACI has often expressed its willingness to assist in such studies in every practicable way. Such an approach is

particularly important for existing airports, in order to allow them to handle new large aircraft (NLAs) with minimum changes and without prejudice to safely. In this context, ACI welcomes the ICAO guidance produced on this subject, with ACI's participation, as the first part of ICAO's Action Plan on New Large Aircraft. ACI is encouraged that ICAO will be re-examining the specifications for aerodrome reference code F, as the second part of its Action Plan on New Large Aircraft. ACI proposes that ICAO should extend this re-examination to codes A to E in due course.

SAFETY MANAGEMENT SYSTEMS

- 10. ACI supports the principle that airports should establish safety management and audit programmes covering all safety-critical systems at the airport, including those operated by other companies. Airport operators should move away from the simple monitoring of compliance with rules and regulations to the development of a safety management system. Such systems have been implemented in many industries, and consist of a cyclical process, including: setting a written safety policy which identifies hazards and risks; organizing and training staff; establishing a safety culture and communication systems; planning and setting standards, including the effective control of risks; and performance management, including active monitoring of compliance and reactive monitoring of incidents. Such programmes should be adapted to the airport in question.
- 11. It is a management responsibility to establish standard operating procedures for all tasks regularly carried out on operational areas of airports, to train personnel to adhere to such standards and to be responsible for their own work. Safety audits should be carried out regularly to ensure that international, national and local standards and procedures are fully observed. Audits, in co-operation with local management and personnel, are an effective method of checking the actual level of safety, whereas the traditional system of checks carried out by inspectors does not necessarily detect flaws or hazards. The establishment of a regular and systematic audit process is a vital element of a safety management system.

CONCLUSION

- 12. Safety at airports should be the subject of a continuous improvement process, using a formal Safety Management System. ICAO Contracting States, international organizations and their members (especially airlines, airports and air traffic control authorities) should work together, across traditional divisions of responsibility to implement such systems at all airports. ACI will work closely with ICAO and other international organizations, to meet the challenge of improving safety standards beyond the high level already achieved in most regions of the world, and to bring about greater uniformity in the application of standards in all countries. ACI is able to offer assistance in areas such as: collaborative initiatives to improve safety at airports (e.g. work with airlines, handling agents and other organizations concerned with ground safety); development of airport design, auditing and certification requirements; and preparation of "best practice" guidelines in these areas.
- 13. Airport operators have a particular responsibility for safety on movement areas. However, not all incidents are currently reported to them, and without such reporting, consolidated at airport level, it is difficult to develop a comprehensive view of the risks encountered, in order to reduce them in future. There appears to be a particular problem with disclosure by airlines and handling agents of incidents occurring on leased areas, such as parts of the apron areas at some airports. ACI urges ICAO to invite States to make regulatory provisions to oblige aircraft operators and handling agents to report all incidents and accidents occurring at airports to the appropriate authorities and to airport operators. ACI supports confidential ("privileged"), "no-fault" collection of data, and agrees with the draft Assembly Resolution on protection of information from safety data collection systems presented in WP/52 this approach should apply to airport and ground handling operations as well as to flight operations

ACTION BY THE ASSEMBLY

- 14. The Assembly is invited to:
 - a) take note of ACI's views;
 - b) agree that ICAO should continue to consult airports, through ACI, on developments concerning the Universal Safety Oversight Audit Programme, inviting ACI to participate in the future development of ICAO SARPs and guidance relating to airport safety certification, safety management systems and safety audits of airports;
 - c) agree that States should be invited to adopt regulatory provisions obliging aircraft operators and handling agents to report all incidents and accidents occurring at airports in the State (including on apron areas) to the appropriate authorities and to the airport operators concerned.. This is consistent with the proposed ICAO resolution on protection of information from safety data collection systems supported by ACI (WP/52); and
 - d) agree that following the study currently in progress (as part of ICAO's Action Plan on New Large Aircraft) of the specifications for aerodrome reference code F in Annex 14, the specifications for all other codes A to E also be re-examined.