



**Twenty-first Meeting of the CAR/SAM Regional Planning and Implementation Group  
(GREPECAS/21)**

Santo Domingo, Dominican Republic, 15 to 17 November 2023

**Agenda Item 3: Global and Regional Developments**  
**3.3 CAR/SAM Air Navigation Services (ANS) Implementation Level**

**ADOPTION OF ICAO RECOMMENDATIONS AS NATIONAL STANDARDS**

(Presented by Airports Council International Latin America and Caribbean)

**EXECUTIVE SUMMARY**

This paper discusses the potential issues arising from the adoption of ICAO Annex 14 Recommendations as National Standards without a technical or risk assessment and makes suggestions to deal with the issues for the meeting's consideration.

**1. Introduction**

1.1. ICAO Annex 14 Recommendations are sometimes systematically adopted as National Standards in some States without a technical or risk assessment of the impact and consideration of local operational circumstances. This may cause implementation issues for aerodrome operators. The issues are discussed below and suggestions made.

**2. Discussion**

Current Situation

2.1. It is observed that in some States the regulator tends to adopt Annex 14 Recommendations, sometimes systematically, as National Standards and places these requirements on aerodrome operations.

2.2. While Annex 14 Recommendations are intended to be good practices in enhancing aerodrome safety, they may not be all practicable or necessary in all States, at all aerodromes, especially at existing aerodromes, and in all circumstances. The following are examples of Recommendations sometimes enacted as National Standards without clear safety benefits:

- a) Recommendation 3.5.4 for a 240 m RESA (intended for code 3 and 4 aerodromes but sometimes unnecessarily mandated for smaller aerodromes);
- b) Recommendation 3.9.12 - Strength of a taxiway should be at least equal to that of the runway (even when some of the taxiways are intended for use by aircraft smaller than the design aircraft of the runway);
- c) Recommendations on runway, taxiway and turn pad shoulders for certain code letters (regardless of current width of runway, taxiway or turn pad); and
- d) Recommendation 9.2.40 on the number of rescue and firefighting vehicles according to aerodrome category.

### Problem

2.3. Enacting these Recommendations without assessment as National Standards may place additional unnecessary costs on aerodrome operations and air operators and be restrictive on operations. In some cases, these requirements are impracticable or unnecessary for aerodrome operators to implement because of physical constraints, e.g., lack of space, or the need to undertake expensive aerodrome works. Often there is a lack of justifiable safety benefits for the local circumstances such as a 240-meter RESA for a small aerodrome, and the financial costs put pressure on limited funding available which could be better spent on other more safety critical areas.

2.4. For both the State and aerodrome operator, building infrastructure as per Annex 14 Recommendations without clear safety benefits diverts human and financial resources that would otherwise be invested in useful safety enhancements, e.g., in training, operational and facilities improvements.

### Recommendations

2.5. It is suggested that as much as possible States should consult with aerodrome operators on the feasibility and necessity of enacting Annex 14 Recommendations as National Standards and consider:

- a) Conducting joint aeronautical studies with the aerodrome operator on the feasibility, operational impact and safety benefits of such recommendations at the aerodrome(s) concerned;
- b) Assessing the costs and benefits of adopting the recommendation as a regulatory impact assessment;
- c) Alternative means of compliance that meet the same safety outcome or are appropriate for the aerodrome operational environment, e.g. declaring shorter runway distances in the case of infeasibility of complying with a RESA recommendation, if such restrictions are deemed acceptable to the State and operator, or technological alternatives such as Engineered Material Arresting System (EMAS) for RESA; and
- d) Discussing with the aerodrome operator a realistic implementation timeframe if such recommendations are found feasible after thorough studies.

**3. Action by the meeting**

3.1. The meeting is invited to:

- a) Consider the suggestions made in paragraph 2.5 above;
- b) Consider adding the topic of “Adoption of Annex 14 recommendations as national standards” to the agenda of the next relevant CAR/SAM meeting for further deliberations; and
- c) Discuss any relevant matters as appropriate.

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