

A Long Journey and Industry Cooperation Towards Nationally Implementing SMS

October 25, 2007

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Introduction

- **A similar presentation has been given to the following CAAs:**
 - > Canada (TC)
 - > China (CAAC)
 - > South Korea
 - > Mongolia
 - > Aviation Safety Council of Taiwan
 - > United States (FAA)

Regulatory Environment

- ICAO Standards and Recommended Practices
- US Department of Defense Quality and Safety Requirements
- IATA Operational Safety Audit (IOSA) Standards and Recommended Practices
- Airline Alliance “Best Practices”
- Highly regulated and overlapping State jurisdictions
 - » Civil Aviation Authority of your State
 - » Civil Aviation Authorities of the States your airline operates into (foreign ops specs)
 - » Authority for Aviation Security
 - » Occupational Safety and Health Authority
 - » Privacy Authority
 - » Justice / Law Enforcement Authorities
 - » Environmental Agency

Civil Aviation Authority Culture

➤ Embedded Culture

- » Decades in the making
- » Focused on inspections, documentation reviews, and enforcement activities versus quality assurance, system monitoring, process reviews
- » Prescriptive Regulatory “oversight”
- » Trying to keep pace with the airline industry and keeping in touch with international standards and norms
- » Cumbersome regulatory processes that preclude revising / enhancing regulations and standards in a timely manner
- » Internal Communication barriers (silos) between CAA Divisions

Air Canada Culture

➤ Embedded Culture

- » 70 years in the making
- » Formerly a state-owned airline
- » “Safety” focused on the safe operation of the aircraft (and then only the CAA regulated Branches)
- » Overcoming the philosophy of “Regulated therefore safe:” regulatory compliance does not necessarily make airline safer
- » Business Units unwilling to share information with others (silos)
- » Never accurately and consistently quantifying costs or other negative impacts due to injuries, incidents, accidents, etc.
- » Safety, Quality, Security, Environment and Risk Management are everyone’s responsibility; however no one was ever truly held accountable

Consistency between Regulations

- Civil Aviation Authority / Regulatory issues
 - » Differentiation needs to be made between regulations, standards, and guidance material (i.e., what is mandatory vs. acceptable means of compliance)
 - » Development and implementation needs to be a “consultative” approach with consistency
 - » Authorities need to work together to ensure there are no inconsistencies / conflicting legislation (Labour Laws, Aeronautics Law, Privacy Laws) which will make implementation extremely difficult for the operator (stay out of court!)
 - » Ensure consistencies between different regional authority offices regarding the interpretation and means of documenting / implementing required components and elements of SMS

Partnership between CAA and Airlines

- Encourage authority participation during SMS development
 - » The size and complexity of a large operator's Airline Management System may be very confusing
 - » Essential that the CAA deploy staff who have an operational airline background and practical experience with Management Systems who are willing to work with the operator
 - > This will avoid the operator "reverse engineering" their entire Management System in order to assist the authority in understanding it
- The authority must move from prescriptive to performance based regulatory framework
- A dispute resolution mechanism must be clearly defined

Partnership between CAA and Airlines – cont.

- Phased in Approach:
 - » Should be an option for states as well as for operators
 - » Should make sense to industry
 - » Should be flexible (e.g., allow for final or accelerated implementation if possible)
 - » Should allow for documentation to be built on a variety of models (e.g., SMS or integrated AMS built on ISO and IOSA)
 - » Expectations need to be based on clear, unambiguous language for both the operator and the CAA
- Utilization of real-time safety and quality data to make educated business decisions and develop (or amend) regulations accordingly
- Participation in industry and regulatory forums to ensure conformity with emerging international industry standards, norms and best practices

Questions?

