**INTERNATIONAL CIVIL AVIATION ORGANIZATION**

**Tenth Meeting of the Regional Aviation Safety Group for the Africa-Indian Ocean (RASG-AFI/10)**

**7 November 2024**

**Agenda Item 4: Status of implementation of the GASP safety goals, targets and indicators including the priorities set for the RASG-AFI Region**

**Difficulties in implementing the 2024 PQs**

*(Note presented by Gabon, Congo and AAMAC)*

| SUMMARY |
|---|
| This paper relates to the increasingly detailed application of ICAO provisions in relation to USOAP audits through the new 2024 PQs which are experiencing significant progress compared to those of 2020, particularly with regard to the qualification of national inspectorate staff. |
| These additional clarifications may impact the effective implementation (EI) rates at state level and may lead to some non-compliance. The note calls for an attitude of caution in the practical interpretation of these provisions of the relevant PQ through progression and changes compatible with the capabilities of the States, the capitalization of acquired knowledge for the inspectors already in the office to avoid major distortions and difficulties in implementation. |
| Action by the Meeting is provided in Paragraph 4.1 of this paper |

| **REFRENCE(S)** | Doc 9734 - Safety Oversight Manual Part A and B |
|---|---|
| | Doc 9735 – Universal Safety Oversight Audit Program. Continuous Monitoring |
| | Doc 10004 - Global Aviation Safety Plan2023 – 2025<br>ICAO USOAP Protocol Questions (PQ) 7.057, 7.205, 7.273 and 7.377. etc. |
| | Annex 19 — Safety management |
| *Strategic objectives* | Safety |

## 1 INTRODUCTION

1.1 USOAP activities are based on Protocol Questions (PQ). Protocol Questions (PQs) are the primary tool used within the ICAO Universal Safety Oversight Audit Program (USOAP) to assess the effective implementation of the eight Critical Elements (CEs) of a national safety oversight system. Established based on ICAO Standards and Recommended Practices (SARPs), Procedures for Air Navigation Services (PANS)

and ICAO guidance material, the PQs are subject to periodic review by the ICAO in order to take into account the amendments made to the provisions and reference documents of the ICAO.

1.2 ICAO Annex 19 in its paragraph 3.2.3.1 supplemented by its Appendix 1 requires States to put in place the Critical Elements (CE) to enable them to comply with the standards and recommended practices (SARPs) accordingly.

## 2. ANALYSIS

2.1 The various State results taken from the USOAP CMA Online Framework (OLF) on the implementation of EC 4 show average of low implementation. On a global scale it is 62.02% compared to 59.42% for WACAF States and 58.95% for ESAF States in the AFI region.

Details are presented in the table below (Source: ICAO OLF USOAP).
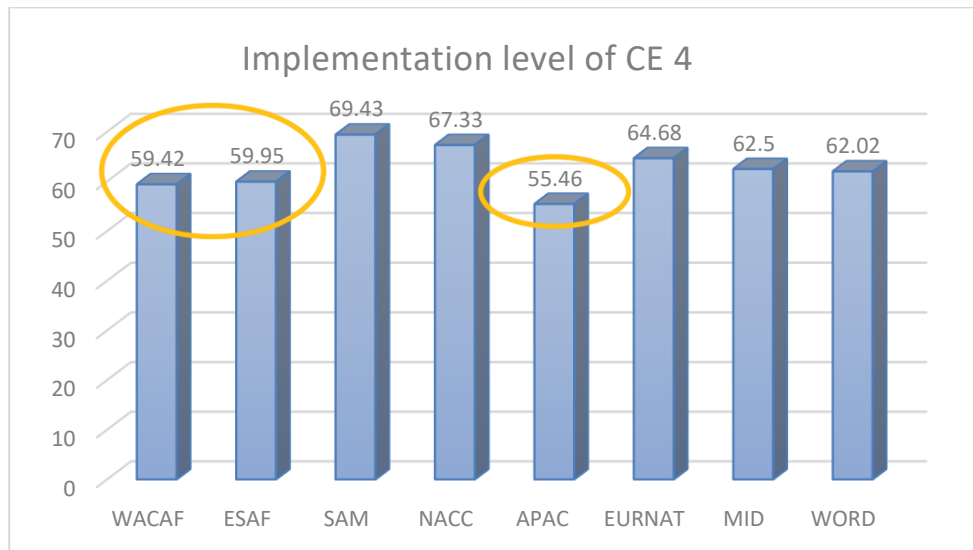


2.2 The results of the analysis of this data from the various audit reports attribute this level of implementation to the following difficulties faced by States:

- Lack of a clear policy for developing the skills of technical inspectorate staff at the level of the Civil Aviation Authorities (CAA);
- Lack of sufficient resources for the training and qualifications of technical inspectorate staff.
- Difficulties in recruiting and retaining qualified/competent technical inspectorate staff.
- Resources and working conditions sometimes less attractive for attracting industry personnel to AACs;
- Lack of a recruitment mechanism by vacancy notice (AVP) to recruit qualified technical inspectorate staff;
- Inadequacies in the implementation of training programs and individual staff training plans;
- etc.

## 3. DISCUSSIONS

3.1 The 2020 protocol questions have been revised. New PQ are in force since 2024. Among the notable characteristics of this 2024 edition of the Protocol Questions, we note greater precision provided in the description of the qualification criteria for ATS inspectors.
The traditional qualification criteria called for state inspectors:

a) to have aeronautical licenses.

b) and to have operational and technical working experience compatible with the activities
they are called upon to carry out.

The new provisions require ATS inspectors to have an air traffic control license (PQ 7.057).

3.2 These new PQs require State technical inspectorate staff to demonstrate that their operational experience, licenses, etc. are at least equivalent to that of the personnel of the entity to be audited or certified. PQ 7.057, for example, requires an air traffic controller license as part of the qualification criteria for an ATS inspector. In 2020, the same PQ required only an aeronautical qualification. In 2024, an air traffic controller license is required for an ATS inspector. The same applies to other inspectors in the OPS, AIR, AGA, etc. fields.

3.3 For States like those of the AAMAC (belonging to the same RSOO), the ANSP is the same. If all these eighteen States plan to have an inspector who has practiced or obtained his certificate within the ANSP in specialized areas such as in-flight calibration, radar maintenance, procedure design, air traffic controllers, etc., this would create difficulties for the States and the ANSP to comply with in term of implementation.

3.4 To date, States have their inspectors qualified and authorized according to their own criteria, contained in their national regulation. Some of them take an oath.
To date, the activities carried out by State inspectors are satisfactory regarding the USOAP audits that the States have received with the scores known and disseminated. The USOAP audits reports did not mentioned a question of qualities of state inspectors.

3.5 A thorough reading of the new provisions of the PQ 2024 concerning operational experiences thus gives pride of place to certain categories of professionals to the detriment of others.

3.6 The attention of ICAO must be called to capitalize on the achievements with "grandfather's law" for inspectors already in duty before the entry into force of these provisions introduced in the 2020 PQs and maintained in those of 2024.

## 4. ACTION BY THE MEETING

4.1 The meeting is invited to:
a) Take note of the content of this note and the concerns raised;
b) Consider the realities of the States of the AFI region to consider a progressive approach of the PQs; and
c) Encourage ICAO to finalize and adopt DOC 10070 to enable States to have a formal competency framework for civil aviation inspectors.