Supporting Guidance for AOSP / SSP

1. The **requirement for Operators to develop a security programme started in 1974** with the first Annex 17, **but with the State of the Operator only** … "*operators of aircraft of its registry to adopt a security programme"* (Standard 6.1.1, 1974).

2. The **requirement** for Operators to develop security programmes **for all States of the Operators and States of the operations exists since 1986** (Amendment 6 to Annex 17).

3. IOSA requires Operators to develop Security Programme for all IOSA-registered airlines since the first edition of **IOSA Standards Manual (ISM) in 2003**. The requirements became the development of Air or Aircraft Operator Security Programme (**AOSP**) in all States where operations are conducted.

4. **The challenges for Operators with the development of AOSPs for both the States of the Operators and the States of the operations were the incremental administrative burden with duplication of documents and translations, maintenance, and accountability issues.**

5. **The challenge for regulators was the requirement to review and approve individual foreign airline's AOSPs without acknowledging or trusting the review/approval granted by the respective States of the Operators.**

6. In **2019**, the African Civil Aviation Commission (AFCAC) outlined the challenges States are facing with the implementation of the ICAO AOSP Standard (3.3.1) and "the inconsistency in its implementation, notably due to the challenges in meeting the approval obligation, which could be attributed to the interpretation". The AVSEC Panel approved the review of existing **Standard 3.3.1 for the State of the Operators**, and the introduction of a new **supplementary Standard for the States of the operations**,

7. In **2022, Amendment 18 to Annex 17** proposed two new standards, **Standard 3.3.1 for the State of the Operator, with the development of AOSPs meeting the requirements of the State of the Operator (like Standard 6.1.1 in Annex 17, 1974**) and **Standard 3.3.2 for foreign operators to develop "Supplementary Station Procedures" (SSPs) that meet the requirement of the States of the operations**.

8. Supplementary Procedures to the AOSP, as indicated in the **Impact Assessment of the ICAO State Letter** presenting Amendment 18 to Annex 17 to States in March 2022 (and corrigendum in April 2022).

9. Supplementary Procedures "*annexed to the AOSP, that meet any requirements of other States where operations are conducted that are not addressed in the AOSP"* (**ICAO AOSP/SSP public guidance**)

10. **Operators should perform a gap analysis between their AOSP and the local requirements of the States of their operations, to assess the need for Supplementary procedures (in the form of SSP) covering the local requirements that not already addressed on their AOSP**.

11. Unfortunately, in 2024, too many States and regulators have not fully read the Impact Assessments contained in the ICAO State Letter presenting Amendment 18 to Annex 17, nor the ICAO guidance material made available publicly and in the ICAO Aviation Security Manual (Doc 8973, Restricted).

12. Moreover, the USAP-CMA Protocol Questions related to Standards 3.3.1 (AOSP) and 3.3.2 (SSPs) are not aligned with the Impact Assessments contained in the ICAO State Letter, nor the guidance provided by ICAO (publicly and via its Doc 8973), thus fueling confusion with the implementation at State level.

Essential Implementation Considerations

For AOSPs:

1- AOSPs are required by Annex 17 since 1997 (and mandatory in ISM since 2003)
2- AOSP is established, implemented, and maintained by each Aircraft Operator
3- AOSP is developed in a written form and must meet the requirements of the national civil aviation security programme (NCASP) of the State of the Operator
4- States of the Operators (and the operations) shall share the appropriate parts of their NCASP and/or relevant information or guidelines with aircraft operators (both national and foreign) enabling them to meet the requirements of the NCASP (Annex 17, Standard 3.1.9, 2022)
5- AOSP should be approved, reviewed, verified by the State of the Operator and an acknowledgment provided to the Aircraft Operator ((Doc 8973, para 15.2.5 and footnote containing the information to be provided in the acknowledgment)
6- In its Letter of Acknowledgement for AOSP, the State of the Operator should state they perform regular quality control and compliance functions over their registered Aircraft Operators for maintaining the strict relevance of the AOSPs with the national security requirements applicable.

For Supplementary [to AOSP] Stations Procedures (SSPs):

7- When receiving the appropriate parts of the NCASP of the State of the operation (#4 above), the Aircraft Operator should **perform a gap analysis** between its AOSP and the local requirements with the view to assess the need to develop <u>Supplementary</u> Station Procedures (SSPs)
8- <u>SSPs are supplementary to the AOSP</u> and should only be issued when the requirements of the NCASP of the State of the operations are not already addressed in the AOSP (ICAO AOSP/SSP public guidance)
9- When SSPs are required, Aircraft Operators should establish one single "national" SSP per State of the operations. National SSP templates, ICAO Doc 8973 Appendix 24 or the Operations Security Implementation Verification Checklist shared in the SeMS Toolkit for ESPs could be used as templates
10- SSPs should be approved, reviewed, verified by the States of the operations and acknowledgment provided to the aircraft operator ((Doc 8973, para 15.2.7 and footnote containing the information to be provided in the acknowledgment).

Reference documents

ICAO State Letter presenting Amendment 18 to Annex 17 (17 March 2022)
Corrigendum of the Impact Assessment of the State Letter (19 April 2022)
ICAO AOSP/SSP public guidance

SeMS Aviation Community (require access via aviationsecurity@iata.org)
IATA SeMS Toolkit for ESPs (For the Appendix 1 - Operations Security Implementation Verification Checklist)

IATA AOSP/SSP webpage (via the IATA Aviation Security webpage)

New AOSP and SSP Standards

ICAO Impact Assessment for Standards 3.3.1 and 3.3.2 (19 April 2022, State Letter, page F-26)

Impact on ICAO

Auditability:

Assessment by USAP CMA on the auditability of the proposal

Due to the current ambiguity shared by many regulators in many regions and by many aircraft operators, the rewording of 3.3.1 and the introduction of a new 3.3.2 will resolve the current ambiguity, clarify the policy intent, and assist in the smooth functioning of USAP audits.

With the new 3.3.1, the States of the operators are required to ensure that the aircraft operator security programmes (AOSP) of their operators meet the national requirements, and they should establish means to confirm their approval, review or verification of the AOSP and provide acknowledgment to the aircraft operator.

With the new 3.3.2, host States are required to approve, review or verify the Supplementary Station Procedures (SSP) of the foreign commercial air transport operators providing service from these States in order to ensure that these operators meet the national requirements that are not addressed in the AOSP of the operators. A formal acknowledgement should be provided to the foreign aircraft operators.

New AOSP and SSP Guidance

ICAO

Doc 8973 – Restricted

Aviation Security Manual

Thirteenth Edition, 2022

Approved by and published under the authority of the Secretary General.

INTERNATIONAL CIVIL AVIATION ORGANIZATION

[Doc 8973 - Restricted](#)

AIRCRAFT SECURITY

15.1 AIRCRAFT OPERATORS [1]

15.1.1 General

15.1.1.1 Aircraft operators have a responsibility to the travelling public and their employees to conduct secure operations. This obligation includes the conduct of aircraft checks and searches, protection of aircraft, aircraft maintenance areas and other restricted areas, and security measures for transit operations, baggage, cargo, mail and catering. Consequently, commercial aircraft operators should develop security procedures that comply with Annex 17 provisions and NCASPs.

15.1.1.2 In order to fulfil aviation security obligations under Annex 17, NCASPs and associated regulations, commercial aircraft operators should:

a) establish, implement and maintain an Aircraft Operator Security Programme (AOSP) that meets the requirements of the NCASP of the State of the Operator;

b) establish, implement and maintain written supplementary station procedures (SSPs), annexed to the AOSP, that meet any requirements of the NCASP of other States where operations are conducted that are not addressed in the AOSP (more information on establishing an AOSP and SSPs can be found in **Appendix 24**);

c) include, as deemed necessary by the operator, additional elements in their AOSP that are specific to the operations and policies of the operator (e.g. requirements mandated by the operator's security management system – SeMS). These additional elements, which are not required by States, could be included in the main body of the AOSP or as a separate appendix;
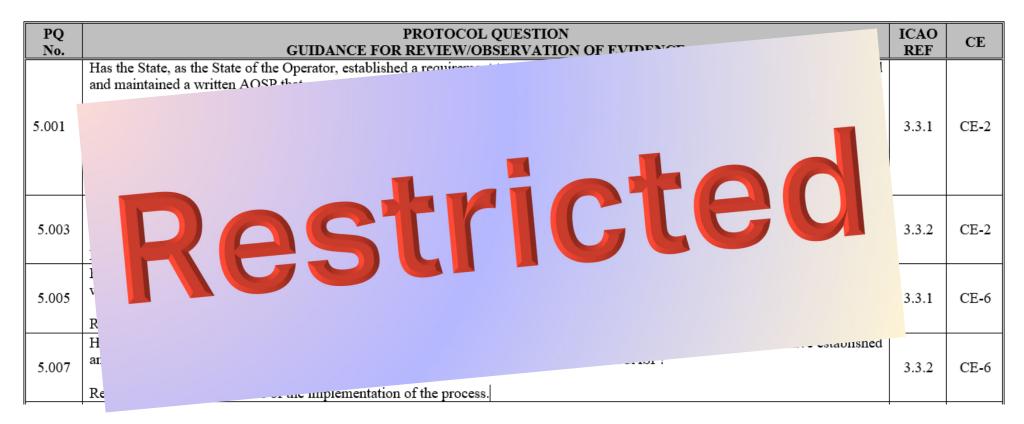
IATA

New AOSP and SSP Guidance

ICAO public guidance material (June 2022)

1.2.3 The States of operation should share with aircraft operators operating in its territory, in advance of the commencement of operations, the appropriate parts of their NCASP and/or relevant information or guidelines to enable those aircraft operators to meet the national requirements. Those States should also share, in a practical and timely manner, any relevant information that could impact the risk assessments relating to an aircraft operators' operations.

1.2.4 The State of the Operator is responsible to ensure that the AOSP meets the requirements of their NCASP. To achieve this, States, under their national legislation and/or policy, may consider the need to formally approve AOSPs and/or subject them to appropriate review or verification processes based on established procedures. States of the Operator should ensure that the aircraft operators are aware of their policy and applicable processes.

1.2.5 The State of the Operator should establish a means to confirm their approval, review or verification of the AOSP and provide such acknowledgement[3] to the aircraft operator.

1.2.6 SSPs should be tailored for each airport/station where operations are conducted, and submitted upon request to the appropriate authority of the State in which that airport/station is located. The appropriate authority of those States where operations are conducted should be empowered to require foreign aircraft operators to establish, implement and maintain written SSPs that meet the requirements of the national civil aviation security programme of that State.

1.2.7 States could decide to either formally approve, review or verify SSPs, and should provide such acknowledgment to the aircraft operator[3] once the process is complete.

[3] States should consider including the following information when providing acknowledgment: aircraft operator accountable manager, reference # AOSP (or SSP) presented, date of approval of AOSP by the operator, validity if applicable, accountable official from the States of the Operators (AOSP) or Operations (SSP), Station and State (SSP), reference of NCASP used for compliance, confirmation that national requirements are met.

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USAP-CMA Protocol Questions *(18Nov2022)*

PQ No.	PROTOCOL QUESTION GUIDANCE FOR REVIEW/OBSERVATION OF EVIDENCE	ICAO REF	CE
5.001	Has the State, as the State of the Operator, established a requirement and maintained a written AOSP that	3.3.1	CE-2
5.003		3.3.2	CE-2
5.005		3.3.1	CE-6
5.007	H... an ... established ... SSP? Re... the implementation of the process.	3.3.2	CE-6

No difference between AOSP and SSP Protocol Questions

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