MEMORANDUM CIRCULAR NO.: 19-16

TO : **ALL INTERNATIONAL AERODROME OPERATORS**
ALL DOMESTIC AERODROME OPERATORS CATERING TO AIRCRAFT WITH MORE THAN 30 PASSENGER SEATS

FROM : **THE DIRECTOR GENERAL**

SUBJECT : **SMS REQUIREMENTS FOR AERODROME OPERATORS**

1. REFERENCES

- ICAO DOC 9859 3RD Edition - Safety Management Manual
- ICAO DOC 9881 – PANS Aerodromes
- ANNEX 19 - Safety Management
- MC 19-14 - Regulation of Air Traffic Service SMS and Air Traffic Service Units/Facilities
- MC 02-11 - Establishment and Implementation of Safety Management System
- AC139 & CAR-ANS-009-01-0 - Implementation of Safety Management System for Aerodrome & ANS providers
- Civil Aviation Regulation Governing Aerodromes
- Manual of Standards for Aerodromes

2. INTRODUCTION

2.1. In support of ICAO's recognition of the need for a safety management system in aviation, CAAP, being the regulatory oversight body in Philippine aviation industry, requires the operators of aerodromes covered by the certification programme of ARCID (Aerodrome Registration Certification and Inspection Division) to have a safety management system that is acceptable to the state. Aerodrome operators covered by the certification programme are those that conduct international air transport operations or domestic air transport operations with more than 30 passenger seats or have a published approach procedure.

2.2. The SMS regulation for aerodromes under the certification programme can be found in the CAR Governing Aerodromes, the Manual of Standards for Aerodromes and other documents such as memorandum and advisory circulars issued by CAAP.

Old MIA Road corner Ninoy Aquino Avenue, Pasay City, Metro Manila, Philippines, 1300
Tel: (+632) 879-9102 / www.caap.gov.ph

2.3. As part of its regulatory function, ARCID of AANSOO (Aerodrome and Air Navigation Safety Oversight Office) lays down the SMS (Safety Management System) requirements for aerodrome operators in order to establish the state's expectations of what an acceptable SMS is. The requirements are not intended to restrict the aerodrome operators but rather serve as tools to harmonize the implementation of aviation SMS with other organizations.

2.4. Though this document intends to provide flexibility for aerodrome operators in meeting the requirements, some of the conditions asked by the regulatory body may sound prescriptive and specific. This is so in order to facilitate a more concrete guidance and swifter compliance.

3. APPLICABILITY

3.1. This document is applicable but not limited to operators of CAAP and non-CAAP aerodromes under the certification program. Operators covered by the permit-to-operate and registration programs are also encouraged to introduce an SMS at their aerodromes.

4. APPROVAL OF SMS

4.1. Aerodrome operators are advised to use a phased implementation approach on building an SMS. They may pattern their implementation plan on the recommended four phases provided in ICAO Doc 9859. The phased approach to SMS implementation is complemented by the acceptance process of ARCID discussed in a separate document "SMS Acceptance and Surveillance Programme". The acceptance process involves progressive assessment using the SMS acceptance checklist recommended by ICAO in the Safety Management Manual 3rd Edition. The initial acceptance for an aerodrome SMS is the achievement of 45% performance based on the SMS acceptance checklist. An aerodrome SMS shall be granted approval or acceptance by the regulator when it reaches 85% or higher SMS performance. Once the aerodrome operator's SMS has been accepted by CAAP, it shall be included in the ARCID's yearly surveillance program with the purpose of continuously monitoring the safety-related activities of the organization and ensuring the robustness of SMS is maintained.

5. SMS REQUIREMENTS

CAAP through AANSOO establishes the following SMS requirements for aerodrome operators.

5.1. Requirement to establish and implement an SMS

5.1.1. The aerodrome operator is required to develop, establish and implement an aerodrome SMS, including an SMS manual, in accordance with the framework

detailed in ICAO Annex 19 and Doc. 9859. The manual shall form part of its SMS documentation and shall define the organization's SMS frame work and its associated elements. The format and content items of the SMS manual shall be in accordance with Appendix 4 to Chapter 5 of Doc 9859.

5.1.2. This section specifies the framework for the implementation and maintenance of an aerodrome SMS. The framework comprises four components and twelve elements as the minimum requirements for SMS implementation.

5.1.2.1. Safety policy and objectives

(a) Management commitment and responsibility
(b) Safety accountabilities
(c) Appointment of key safety personnel
(d) Coordination of emergency response planning
(e) SMS documentation

5.1.2.2. Safety risk management

(a) Hazard identification
(b) Safety risk assessment and mitigation

5.1.2.3. Safety assurance

(a) Safety performance monitoring and measurement
(b) The management of change
(c) Continuous improvement of the SMS

5.1.2.4. Safety promotion

(a) Training and education
(b) Safety communication

5.1.3. The specific requirements for aerodrome SMS are but not limited to the following:

5.1.3.1. The aerodrome operator shall make a safety policy statement that is relevant to the scope of the organization's operations, signed by the accountable executive and communicated to all the staff in the aerodrome making them aware of their safety obligations, and periodically reviewed to ensure currency and relevance. Further, the safety policy should address the provision of the necessary resources for its implementation and include safety reporting procedures.

5.1.3.2. The aerodrome operator shall identify the accountable executive who has ultimate responsibility and accountability, on behalf of the organization, for the implementation and maintenance of the SMS.

5.1.3.3. The aerodrome operator shall have a documented agreement with subcontractors pertaining to the delivery of service to ensure that the safety requirements of the organization are met. It is the responsibility of the aerodrome operator that the interface of the organization's SMS and the safety system of the subcontractors address hazard identification and risk mitigation strategies.

5.1.3.4. The aerodrome operator shall have an organizational structure in which the managers' safety functions, responsibilities and accountabilities are clearly defined and included in their terms of reference, and communicated throughout the organization.

5.1.3.5. There shall be an established safety services office for the aerodrome headed by a qualified appointed Safety Manager who is responsible for the implementation and maintenance of an effective SMS and for the collection, analysis and distribution of safety related data.

5.1.3.6. There shall be a Safety Review Committee (SRC) or Board that deals with issues related to policies, resource allocation and organizational performance monitoring, and a Safety Action Group (SAG) that deals with specific implementation issues as directed by the SRC.

5.1.3.7. The aerodrome operator shall have an Emergency Response Plan (ERP) or Aerodrome Emergency Plan (AEP) that documents actions to be taken by all responsible personnel during aviation-related emergencies. The aerodrome operator shall ensure that an emergency response plan is properly coordinated with the emergency response plans of those organizations it must interface with during the provision of its services.

5.1.3.8. There shall be an SMS document contained within the Aerodrome Manual or a "stand alone" Safety Management System Manual. The SMS document shall describe a set of procedures that must be followed and ensure that each element in the ICAO SMS framework is addressed according to the aerodrome operator's specific system.

5.1.3.9. There shall also be an SMS library or electronic library for wherein safety related documents are filed and kept readily available for distribution. The library can be collocated with the safety office.

5.1.3.10. The SMS procedures should reflect appropriate integration with other relevant management systems within the organization, such as QMS and OSHE as applicable.

5.1.3.11. The aerodrome management shall develop an SMS implementation plan broken out in phases and endorsed by the accountable executive. Operators may follow the recommended structure of phased approach implementation in ICAO Doc 9859 Safety Management Manual. The SMS implementation plan should include targets consistent with the deficiencies identified in the gap analysis process, the size of the organization and the complexity of its products or services.

5.1.3.12. The aerodrome operator shall develop and maintain a process of hazard identification based on reactive, proactive and predictive or a combination of methods of safety data collection as applicable. It shall further maintain a process for safety risk assessment and mitigation. Such hazard identification and risk assessment (HIRA) process shall be in accordance with the ICAO recommended procedures to harmonize with the ICAO-based assessment checklists used by AANSOO ARCID and to ensure uniformity among aerodrome operators within the Republic of the Philippines.

5.1.3.13. There shall be a procedure to prioritize HIRA performance for operations, processes, facilities and equipment with identified or known safety-critical hazards/risks.

5.1.3.14. The aerodrome operator shall continually monitor the internal processes as well as its environment in order to detect deviations and changes that could contribute to safety risks by developing voluntary and mandatory reporting systems, and adopting other means of monitoring such as surveys, reviews, investigations and audits. The aerodrome operator should also have a means to validate the effectiveness of its mitigation procedures and risk controls.

5.1.3.15. The aerodrome operator shall develop safety performance indicators (SPI) for measuring and monitoring the organization’s safety performance with corresponding safety performance targets and alert levels.

5.1.3.16. There shall be a procedure for review of relevant existing aviation facilities or equipment, operations and processes whenever there are pertinent changes to those facilities and processes or changes external to the organization such as regulatory/industry standards, best practices or technology. There shall also be a review of new safety-related

aviation facilities or equipment for hazards and risks before they are commissioned.

5.1.3.17. There shall be a procedure for periodic internal audit/assessment of the SMS and a follow-up procedure to address audit corrective actions.

5.1.3.18. The aerodrome operator shall develop and maintain a safety training programme that ensures the personnel are trained and competent to perform their SMS duties.

5.1.3.19. The aerodrome operator shall communicate SMS policies, objectives and procedures to all employees through safety bulletins, websites, email, distribution of SMS manual and other relevant means.

Note: Guidance on a phased approach to SMS implementation can be found in ICAO Doc 9859 and Annex 19.

5.2. Requirement to Notify Significant Changes or Planned Changes, and Significant Occurrence/s to CAAP.

5.2.1. CAAP shall be responsible for accepting and overseeing the aerodrome operators' SMS through audits, scheduled inspections, and unscheduled inspections due to safety-related issues and changes. On the other hand, the aerodrome operator shall be responsible for fulfilling its SMS obligations and discharging its SMS functions through continued safety assessment and review of its SMS processes. The aerodrome operator shall be responsible for conducting safety assessment/s identified during aerodrome compatibility study; or whenever there are significant changes in equipment or in the operation of existing unit, planned safety-related changes, deviations from standards and applicable regulations, safety occurrences or when any other safety concerns arise. Furthermore, the aerodrome operator shall be responsible for reporting to CAAP any significant change in equipment or any safety-related occurrence, and submitting the corresponding safety assessment and other documents as required. The procedure for review of the submitted documents on safety assessment is detailed in the SMS Acceptance and Surveillance Programme for aerodrome operators.

Note: A compatibility study between aeroplane operations and aerodrome infrastructure and operations shall be conducted whenever an aerodrome accommodates an aeroplane that exceeds the certificated characteristics of the aerodrome. It should be performed collaboratively between affected stakeholders which includes the aerodrome operator, the aeroplane operator, and ground handling agencies as well as the various air navigation service providers (ANSPs). Guidance on aerodrome compatibility study can be found ICAO Doc. 9881 Chapter 4 which outlines the methodology and procedures to assess the adequacy between aeroplane operations and aerodrome infrastructure and operations.

5.2.2. Change Notification

5.2.2.1. The aerodrome operator shall notify CAAP through AANSOO ARCID of the major changes in the equipment / facility or in the operation of an existing unit, and planned changes in the procedures and regulations that may have significant effect on the management of safety. It shall also notify CAAP of the changes in practices and regulations that are external to the organization which have significant impact on the safety of the aerodrome operations.

5.2.2.2. Notification of the changes shall include submission of the associated documentation such as hazard identification, risk assessment and proposed mitigating actions at least 30 days before the schedule of implementation or the schedule of commissioning of new equipment.

5.2.2.3. When notified of a planned safety-related change, CAAP through AANSO ARCID shall acknowledge receipt and accept the safety assessment, and the aerodrome operator may implement the change without further reference to ARCID; or elect to audit the change without requiring the aerodrome operator to secure authorization for implementation, and request additional information to complete the audit; or elect to audit the change and require that it is not implemented until the audit is satisfactorily completed. This option may be employed if the change is substantial or of particular sensitivity; or direct that the change not be implemented. This option is only likely to be employed if the proposed change contravenes legislation or the Philippines' international obligations.

5.2.3. Significant Occurrence Notification

5.2.3.1. The aerodrome operator shall notify CAAP of the significant safety occurrences such as incidents, accidents and deviations from standard practices. It shall have a procedure for investigation of significant safety occurrences and timely resolutions. Documentation on remedial actions or mitigation measures shall be submitted to CAAP for review as soon as practicable.

5.2.3.2. When notified of a significant occurrence, CAAP shall review and accept the corresponding safety assessment of the aerodrome operator. If the assessment is found to be deficient, CAAP shall coordinate with the aerodrome operator to reach an agreement on safety acceptance. If an agreement cannot be reached, CAAP shall reject the proposal for

resubmission by the aerodrome operator; or impose conditional measures to ensure safety.

6. SMS REGULATION CLAUSE

Effective immediately, all aerodrome operators under the CAAP certification programme shall have in place a safety management system commensurate with the size and the complexity of its aviation products or services, acceptable to CAAP in accordance with the established process detailed in the SMS Acceptance and Surveillance Programme, and which addresses four high-level safety objectives as follows: a) identifies safety hazards; b) ensures the implementation of the remedial action necessary to maintain agreed safety performance; c) provides for continuous monitoring and regular assessment of safety performance; and d) aims at a continuous improvement of the overall performance of the safety management system.

LT GEN WILLIAM K HOTCHKISS III AFP (Ret)
Director General

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