

POSITION PAPER

Implementation of SSPs

- The introduction of Supplementary Station Procedures (SSPs) into ICAO Annex 17 and, most recently, European Union (EU) Regulations does not create a blanket new obligation for aircraft operators to produce new documents at every station of their network within the EU.
- SSPs are conditional. They may be required where an aircraft operator's existing Aircraft Operator Security Programme (AOSP) does not already address the national requirements of a State of operations. This is clearly stated in the [ICAO AOSP/SSPs public guidance material \(September 2022\)](#).
- Accordingly, IATA's position is that, following Annex 17 Standard 3.1.9 requirement, regulators must provide relevant National Civil Aviation Security Program (NCASP) information so that each aircraft operator can conduct a gap analysis between its AOSP and the local requirements of each State of their operations and then determine if supplementary procedures are needed. In practice, existing local SOPs that are not domestic maybe renamed as SSPs. Existing AOSP validations and existing local procedures remain valid and should, in most cases, simply be recognised and/or renamed rather than rebuilt.
- For EU Member States and all aircraft operators operating within the EU, [Commission Implementing Regulation \(EU\) 2026/449](#) (adopted 27 February 2026) preserves the pre-2026 regulatory status quo. Its provision 3.0.10 reproduces Annex 17 Standard 3.3.2 but includes more flexibility in using "*ensure*" instead of "*require*" and adds the decisive qualifier that supplementary procedures are unnecessary if "these requirements are already addressed in the air carrier security programme". This provision also introduces flexibility for non-EU airlines in confirming that their AOSP and existing local SOPs, if any, where sufficient, stand on their own. This is fully consistent with the true intent of Standard 3.3.2, the related ICAO State letters, and the associated guidance material created in 2022.
- Article 13 of [Regulation \(EC\) 300/2008](#) remains fully applicable throughout. Every airline must develop and maintain an AOSP complying with both EU regulations and the respective NCASP of the EU Member States from which it operates from, submit that AOSP to the appropriate authority on request, and, for Community airlines, benefit from mutual recognition by all EU Member States of their AOSP validated by their EU Member State of the Operator.
- Article 13(3) preserves each EU Member State's right to request implementation detail on both More Stringent Measures under Article 6 and applicable local airport procedures. Applicable to the AOSP and to foreign local SOPs (renamed SSPs) alike. In short, existing validations stay valid, and existing foreign local procedures or More Stringent Measures should simply be regarded, and likely renamed, as SSPs.
- For operations outside the EU, please refer to the Essential Implementation Considerations overleaf.
- This position rests on the fact that the underlying obligation is not new. The requirement for aircraft operators to hold an AOSP complying with their State of Operator has existed since Annex 17 was created in 1974, and was extended to all States of their operations in 1986. Furthermore, IATA's own IOSA program carried this requirement since its inception in 2003. In 2022, Amendment 18 to ICAO Annex 17, was more focused on terminology and structure rather than substance: Standard 3.3.1 restated the State of the Operator obligation, while the new Standard 3.3.2 formalised the concept of supplementary procedures for the States of operations, subsequently supported by [ICAO Guidance Material \(2022\)](#) and IATA's own [Supporting Guidance \(2024\)](#) and [Full Supporting Guidance \(2025\)](#).
- IATA maintains that [EU Regulation 2026/449](#) is the latest step in that evolution, not a departure from it.

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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] Station 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 Supplementary Station Procedures (SSPs)
- 8- SSPs are supplementary to the AOSP 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/SSPs public guidance](#))
- 9- When SSPs are required, Aircraft Operators should establish one single “national” set of SSPs per State of the operations. National SSPs 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](#)).

For the specific security standards of the Operator (ISM SEC 1.2.1):

- 11- The security standards of the Operator mentioned in ISM SEC 1.2.1 should be either included in the main body, or as a separate appendix of the AOSP, or included in the SSPs (when the local environment is judged unsatisfactory by the Operator). In all cases, security standards of the Operator should be endorsed by the appropriate authorities of the State of the Operator (if in the AOSP) or the State of the operations (if in the SSPs).

Reference Documents:

For ICAO:

[ICAO State Letter on the Adoption of Amendment 18 to Annex 17 \(17 March 2022\)](#)

[Corrigendum of the Impact Assessment of the State Letter \(19 April 2022\)](#)

[ICAO AOSP/SSPs public guidance material \(September 2022\)](#)

For Europe:

[Commission Implementing Regulation \(EU\) 2026/449 of 27 February 2026](#)

[Regulation \(EC\) 300/2008 of the EU Parliament and the Council of 11 March 2008](#)

For IATA:

[SeMS Aviation Community](#) (require access via aviationsecurity@iata.org)

[IATA SeMS Toolkit for ESPs](#) (check *Appendix 1 - Operations Security Implementation Verification Checklist*)

[IATA Aviation Security webpage](#)

[IATA Aviation Security Position Papers webpage](#)