New ICAO Amendment 18 to Annex 17 became effective in July 2022, and will become applicable in November 2022, as per ICAO State Letter (AS 8/2.1-22/20) dated 17 March 2022 and its corrigendum dated 19 April 2022.

One important aspect of that amendment will directly impact the States imposing requirements on foreign airlines in the form of “local” Aircraft Operator Security Program (AOSP) that should now be replaced by Supplementary Station Procedures (SSPs), annexed to the original AOSP, that meet any requirements of the local National Civil Aviation Security Programme (NCASP) of other States where operations are conducted that are not addressed in the original AOSP.

ICAO issued an Electronic Bulletin (2022/23 on 23 June 2022 via the ICAO- NET Secure Site Portal) sharing, inter alia, the new Aviation Security Related Guidance Material in the Security Manual (Doc 8973) explaining how to best implement the new AOSP/SSPs requirements, in six languages, with an abstract¹ published on the ICAO public page for wider promotion and advocacy.

In this context, States need to understand and implement the two new Amendment 18 to Annex 17 Standards 3.3.1 and 3.3.2 on AOSPs and SSPs considering the following essential elements:

— AOSPs are only approved by the State of the Operator (Annex 17 Standard 3.3.1), and a letter of acknowledgment should be issued in return to the operator (paras 15.1.2.4 and 15.1.2.5 of the guidance)

— AOSPs could be shared by the airlines with the States of the operations (need to be careful with Security Sensitive Information - SSI, para 15.1.2.8), at least in English (para 15.1.2.9), together with the letter of acknowledgement from the State of the Operator, so that these “proofs of compliance” could replace the need for additional SSPs (para 15.1.2.11)

¹ https://www.icao.int/Security/SFP/Pages/AOSP-and-SSP.aspx
— SSPs should be required for local operations by foreign airlines (Annex 17 Standard 3,3,2 and para 15.1.2.6) only when the local requirements are not already addressed in the original AOSP (Appendix 24 para 16 of the guidance, Impact Assessment of the corrigendum of the ICAO State Letter, summary on public webpage for AOSP and SSP)

— If States decide to approve, review and/or verify SSPs, they should provide a letter of acknowledgment once the verification process is completed back to the operator (para 15.1.2.7)

— If templates or models templates are used for AOSP and/or SSP, they should “help reduce the bureaucracy of the document approval process [...] these models should be opened for contributions and adaptations” (para 15.1.2.10), meaning that SSP templates or models should be fully adaptable to each situation and directly linked to the potential gap between local requirements of the States of the operations, and national requirements of the State of the Operator.

The coordination (and assistance) with relevant ICAO Regional Offices, and regional civil aviation organizations, is important as some States will have to either develop specific (and adaptable) models for SSPs, and/or accept “letters of acknowledgment” of AOSPs, and/or accept to review the original AOSP (approved by the State of the Operator) and consider it as good enough for covering the local requirements of the States of the operations.

States should consider the benefits of implementing the “recognition of equivalence” concept with the approved AOSP, and their relevant letters of acknowledgment, in the context of SSPs and States and airlines should be reminded that IATA is developing an Aviation Trust Integrity Project (ATIP) that is designed to reduce the bureaucracy in improving trust and security between States and airlines.