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Civil Aviation Safety Authority



## SUMMARY OF CONSULTATION ON DRAFT AC 139.C-26 V1.0

# Safety management systems for aerodromes

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#### Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

Artwork: James Baban.

# 1 Overview

An SMS is a requirement for large and/or busy certified aerodromes, if passenger numbers or aircraft movement triggers are met, including international airports. [AC 139.C-26 v1.0 - Safety management systems for aerodromes](#) will supersede AC 139-16(1) dated January 2013. It is intended to provide guidance and information for establishing and maintaining an appropriate safety management system (SMS) for all certified aerodrome operators.

This AC may support those who have already established an SMS, as well as for aerodromes that may reach the SMS establishment triggers in the future or choose to voluntarily establish an SMS. It reflects the latest SMS requirements of Part 139 of the *Civil Aviation Safety Regulations 1998* (CASR) and its Manual of Standards (MOS) which, in turn, align with International Civil Aviation Organization (ICAO) standards.

On 27 February 2025, CASA published the Draft AC139.C-26 v1.0 - Safety management systems for aerodromes that set out the requirements for implementing an SMS. The consultation closed on 27 March 2025 and the proposed AC has been modified to reflect the feedback received from organisations and individuals. This final AC provides guidance on:

- general requirements of an SMS
- SMS structure
- building an SMS
- safety policy and objectives
- safety risk management process
- safety assurance
- safety promotion
- SMS implementation planning tool.

## 2 Contents

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## 3 Reference material

### 3.1 Acronyms

The acronyms and abbreviations used in this SPC are listed in the table below.

**Table 1: Acronyms**

Acronym	Description
AC	advisory circular
AEP	aerodrome emergency plan
AMC	Acceptable Means of Compliance
CAR	<i>Civil Aviation Regulations 1988</i>
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
ERP	emergency response plan
ICAO	International Civil Aviation Organization
MOS	Manual of Standards
NASP	National Aviation Safety Plan
ORAT	Operational Readiness, Activation, and Transition
QMS	quality management system
SMS	safety management system
SSP	State Safety Programme
TNA	training needs analysis

### 3.2 Definitions

Terms that have specific meaning within this SPC are defined in the table below. Where definitions from the civil aviation legislation have been reproduced for ease of reference, these are identified by 'grey shading'. Should there be a discrepancy between a definition given in this SPC and the civil aviation legislation, the definition in the legislation prevails.

**Table 2: Definitions**

Term	Definition
just culture	<p>A key feature of a modern SMS is a 'just culture' regime that operates to protect individuals from punitive or disciplinary action for 'honest mistakes' made in the course of performing their aviation-related functions, where:</p> <ul style="list-style-type: none"> <li>the conduct involved is voluntarily reported in accordance with the applicable safety management procedures; and</li> <li>the act or omission is commensurate with an individual's experience,</li> </ul>

Term	Definition
	qualifications and training.
	Excluded from the scope of this kind of protection are acts involving gross negligence, recklessness, or wilful violations of applicable rules and requirements.
safety culture	People's values, attitudes, beliefs and behaviours relating to safety. Organisations with a positive safety culture are characterised by a genuine commitment, by communications founded on mutual trust, by shared perceptions of the importance of safety, and by confidence in the efficacy of preventive measures.
safety manager	A person responsible for managing all aspects of the operation of an aerodrome operator's SMS.
SMS	The organisational structure, procedures, processes and resources needed to implement safety management throughout all activities and processes conducted by the organisation.
Training Needs Analysis (TNA)	The identification of training needs at employee, departmental, or organisational level, for the organisation to perform effectively.

### 3.3 References

#### Legislation

Legislation is available on the Federal Register of Legislation website <https://www.legislation.gov.au/>

**Table 3: Legislation references**

Document	Title
Part 139 of CASR	Aerodromes
Part 139 Manual of Standards	Aerodromes
Part 119 of CASR	Australian air transport operators—certification and management

#### International Civil Aviation Organization documents

International Civil Aviation Organization (ICAO) documents are available for purchase from <http://store1.icao.int/>

Many ICAO documents are also available for reading, but not purchase or downloading, from the ICAO eLibrary (<https://elibrary.icao.int/home>).

**Table 4: ICAO references**

Document	Title
ICAO Annex 14 Volume I	Aerodrome Design and Operations
ICAO Doc 9981	Procedures for Air Navigation Services - Aerodromes

Document	Title
ICAO Annex 19	Safety Management
ICAO Doc 9859	Safety Management Manual

## Advisory material

CASA's advisory materials are available at <https://www.casa.gov.au/publications-and-resources/guidance-materials>

**Table 5: Advisory material references**

Document	Title
AC 119-01 v2.2	Safety management systems for air transport operations
AC 139.C-18v1.0	Aerodrome emergency planning

## 3.4 Forms

CASA's forms are available at <http://www.casa.gov.au/forms>

**Table 6: Forms**

Form number	Title
1591	CASA Safety Management System (SMS) Evaluation Tool and Guidance

## 4 Respondents

A total of sixteen (16) responses to the consultation were received. One (1) respondent was a CASA officer. Six (6) respondents identified as a certified aerodrome operator, three (3) as international airport operators. One (1) as an aerodrome consultant and five (5) others. Ten (10) respondents gave permission for their response to be published.

CASA values the contributions made by all respondents. Where permission to publish has been granted by the respondent, individual consultation responses can be found at <https://consultation.casa.gov.au/regulatory-program/cd-1910os/>

### 4.1 Key feedback

A majority of twelve (12) respondents were supportive of the new AC, including nine (9) respondents suggesting changes. Three (3) respondents opposed the draft AC and one (1) respondent did not answer the question; however, these four (4) respondents' provided comments for consideration.

### 4.2 Themes

#### Theme 1 - Scope of SMS

Six (6) respondents responded that the AC could have more guidance specifically for aerodromes, or that the AC was too generic.

##### CASA response

Eventually, a Part 5 of the *Civil Aviation Safety Regulations 1998* (CASR) will be developed, and all other CASR/MOS will be updated and point to Part 5 of CASR. It is CASA's intention that SMS ACs are consistent<sup>1</sup>, and do not delve into too many specifics of one area of aviation operations as the SMS principles are generally applicable.

Annex 19 - Safety Management was adopted by ICAO in 2013 and consolidated SMS requirements from other Annexes, affecting aircraft operators, approved maintenance organisations, aircraft manufacturers, air traffic service providers and certified aerodrome operators. A reference to Part 5 of CASR has been added to the introduction of the AC.

#### Theme 2 - Implementation of SMS

Four (4) respondents responded that the AC could have more guidance on how to implement an SMS.

##### CASA response

A new Section in the AC on 'Building a safety management system' has been added, including conducting a gap analysis and developing an implementation plan. This is supported with a new Appendix containing an SMS implementation planning tool. Additionally, a reference to Form 1591 which is an SMS evaluation tool has been added.

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<sup>1</sup> See AC 119-01 v2.2 - Safety management systems for air transport operations.



## Theme 3 - Management of change

Three (3) respondents indicated that there were considerable extra references to 'safety case'; the use of safety case terminology needed review, and this should take the form of a Change Management Plan or an ORAT Plan, in relation to change management. Additionally, the use of Safety Case to describe management of change is not relevant and recommended separating 'safety case' and 'management of change'.

### CASA response

*Safety case* is the terminology that the aviation industry is familiar with in support of a request where the regulatory requirements cannot be met. Therefore, it is not appropriate to use a 'Change Management Plan' or an 'ORAT Plan'. The 'management of change' section has been expanded to explain the difference between changes required to be managed under the SMS and regulatory changes. The 'safety case' section has been updated and highlighted with a subheading to reflect that it not necessarily a specific document but refers to assessing and approving a specific change.

## Theme 4 - Emergency response plan

Two (2) respondents responded that the AC should not duplicate information on aerodrome emergency planning (Chapter 24 of the Part 139 MOS) under emergency response planning (Chapter 25 of the Part 139 MOS).

### CASA response

According to ICAO Annex 19 Appendix 2: the service provider is 'required to establish and maintain an emergency response plan (ERP) for accidents and incidents in aircraft operations and other aviation emergencies'. This is very similar to the requirements for establishing an aerodrome emergency plan (AEP).

The AC needs to provide sufficient guidance on emergency response planning as not all certified aerodromes are required to have an AEP or conduct emergency exercises. Duplicated content with AEPs has been removed with a single reference included pointing to AC 139.C-18v1.0 - Aerodrome emergency planning.

## Theme 5 - Runway safety teams

Two (2) respondents responded that the AC should not include guidance on establishing runway safety teams as this was not an ICAO Annex 14 Volume I or a Part 139 MOS requirement.

### CASA response

ICAO PANS-Aerodromes (Doc 9981) does require the aerodrome operator to establish a runway safety team. This requirement will be added to the Part 139 MOS in due course, therefore it is appropriate to include guidance on establishment. The guidance has been amended to recommend runway safety teams to aerodromes that meet the SMS regulatory trigger (50,000 or more air transport passengers or 100,000 or more aircraft movements annually) and for other certified aerodrome operators to consider the safety benefits of establishing a runway safety team.

## Theme 6 - Safety manager role

Two (2) respondents responded that the role of safety manager needed clarification that it could be spread across different other roles or across multiple business units, and that the safety manager was not responsible for maintaining the ERP.

## CASA response

The AC has been updated to reflect that the role of safety manager could be a sole function, or a function combined with other duties provided the other duties did not result in a conflict of interest or adversely affect the performance of safety duties.

According to Annex 19, the safety manager is responsible for the implementation and maintenance of the SMS, which includes maintaining the ERP, as part of the SMS, therefore having the safety manager being responsible for maintaining the ERP has been retained.

## Theme 7 - Other comments

Respondents provided other comments, including:

- definition of busy or complex aerodromes
- SMS should include reference to quality systems
- use of ISO 31:000 risk matrix
- change continuous improvement terminology
- change third-party terminology
- guidance on audit frequency
- duration of retention of audit documentation
- methodologies for data storage, analysis, and usage
- implementation of formal data management systems
- Integration of modern digital risk assessment tools
- case studies for practical application
- templates for training needs analysis' (TNAs), risk matrices tailored to aerodrome operations, sample contractual clauses for third-party compliance with SMS policies
- developing an Acceptable Means of Compliance (AMC), similar to one for air transport operators, would be more useful to aerodrome operators
- additional SMS elements in the AC to those required by ICAO
- changing 'root cause' analysis to 'contributing factors' or 'learning outcomes'
- difference between safety culture and just culture
- training of third-party contractors
- evidence of considering SSP and NASP.

## CASA response

All comments received were reviewed in terms applicability to this aerodrome SMS AC and, where appropriate, amendments were made.

Some specific responses include:

- the AC has been updated to reflect 'busy and complex' aerodromes are those that meet the Part 139 MOS triggers for requiring an SMS (50,000 or more air transport passengers or 100,000 or more aircraft movements annually)
- the Part 139 MOS and AC are based on Annex 19 Appendix 2 and are focussed on SMS based on aviation safety rather than a Quality Management System (QMS) which has its focus on quality of

products and services. Commercial and public passenger areas are beyond the scope of Part 139 MOS and the AC

- Australia, as a signatory to the Chicago Convention, and under the CASRs, is required to comply with the ICAO Annexes, PANS and Guidance Material. It is therefore appropriate to use the ICAO safety risk assessment matrix, which is also a very common methodology
- 'continuous improvement' is the language used in the Part 139 MOS and ICAO Annex 19 and has been retained
- 'third-party' is the language used in the Part 139 MOS and the ICAO Safety Management Manual (Doc 9859) and has been retained
- guidance has been added on the frequency of internal and external audits
- advising specific documentation retention periods, structured methodologies for storage, analysis, and usage of data, formal data management systems and digital risk assessment tools is too prescriptive and has not been included
- case studies are not included in the AC, however, are available on CASA's SMS website
- templates for TNAs, risk matrices tailored to aerodrome operations, sample contractual clauses for third-party compliance with SMS policies are too domain specific for this generic SMS AC and have not been included
- the Part 119 AMC is intended to explain how all of the Subparts to Part 119 work with SMS being only one of 11 Subparts. Detailed guidance on implementation of SMS is provided in AC 119-01 v2.2 - Safety management systems for air transport operations, upon which the Part 139 SMS AC is modelled, therefore an aerodromes SMS AMC is not required
- there are two additional SMS elements included in the Part 139 MOS, being third-party interfaces and safety investigation. These are relevant to aerodrome and aircraft operations, however, any additional elements in Part 139 MOS will be reviewed when CASR Part 5 is developed
- it is not appropriate to replace 'root cause' with 'contributing factors' or 'learning outcomes' as a safety investigation must determine why an accident or incident has happened and not only at 'what helped' the accident or incident to happen. Therefore 'root cause' is retained
- 'safety culture' and 'just culture' are defined in the 'Definitions' and are used a number of times in the AC, where appropriate
- more guidance has been added on training to be provided to third-party contractors
- the AC provides guidance on consideration of the SSP and NASP but does not require aerodromes to provide evidence of considering SSP and NASP.

## 5 Future direction

CASA has incorporated the changes outlined in this document to [AC 139.C-26 v1.0 - Safety management systems for aerodromes](#). When Part 5 of the CASRs is developed this AC may be replaced by a generic Part 5 AC.