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Australian Government
Civil Aviation Safety Authority



POLICY PROPOSAL PP 2618SS

Safety management systems for aerodrome rescue and firefighting and air traffic and air navigation service providers

Project number: SS 15/04

File ref: D26/406197

October 2026

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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.

Overview

Within Australia, safety management systems (SMS) have been phased into the aviation industry since the early-2000s. They are currently regulated by various pieces of legislation (the *Civil Aviation Safety Regulations 1998* (CASR)) according to each industry sector. SMS requirements have evolved during this time resulting in different legislative requirements for the different sectors.

In 2013, the International Civil Aviation Organization (ICAO) adopted a new Annex to the Chicago Convention, Annex 19 Safety Management. As SMS provisions were scattered throughout various Annexes, Annex 19 was created, in part, to consolidate and standardise the requirements for SMS across industry. These Standards and Recommended Practices (SARPs) provide a consistent set of international standards for SMS.

In 2025 post the second amendment to Annex 19, a gap analysis and review of Australia's current SMS regulations against compliance with ICAO Annex 19 Amendment 2 SARPs concerning the SMS framework, was conducted. This review highlighted five current SMS related CASRs have significant levels of differences to the ICAO SMS framework.

Given this CASA is proposing a Part 5 of CASR harmonised SMS regulation, but with a focus on transitioning the current CASRs with the greatest degree of differences to Annex 19 to Part 5 initially. With the proposed Part 5 of CASR and its associated Manual of Standards (MOS) to be initially applicable for a limited scope of those authorisation holders who already have SMS requirements mandated within CASR Parts 139.H, 171, 172, 173 and 175.

Part 5 of CASR, and its accompanying Manual of Standards, aims to provide a single source of SMS requirements, aligned and compliant with ICAO Annex 19, thereby enabling a more consistent ruleset. As the requirements for SMS across industry sectors would be standardised, administration would become simpler and easier for aviation organisations that manage several parts of their operation under the one SMS.

It is also noted that currently none of the SMS related CASRs require the protection of safety data, safety information and related sources. Part 5 of CASR aims to include a section directly related to the protection of safety data and information, in accordance with Annex 19 Appendix 3.

As a result, CASA is intending:

- Alignment insofar as possible Australian standards with the International Civil Aviation Organization (ICAO) standards and the recommended practices (SARPs) in Annex 19 (Safety Management) to the Convention on International Civil Aviation (the Chicago Convention)
- To create an SMS framework and protections of safety data and information principles in Part 5 of CASR which other Parts can refer to and enact for holders of specific authorisations requiring an ICAO-compliant SMS.
- Part 5 of CASR to provide for a Manual of Standards (MOS) that incorporates the minimum standards for an SMS set out in Appendix 2 of Annex 19, and protection of safety data and information as set out in Appendix 3 of Annex 19.
- Part 5 of CASR to have no prescribed offences or penalties, such matters will be addressed in the legislation governing the authorisation (e.g. Part 172 for Air traffic service providers).
- A phased transition of authorisation holders to Part 5 of CASR in accordance with a transition plan of not less than 2 years after Part 5 is made into legislation.

The proposed Part 5 legislation seeks to meet the overarching objectives of minimising the level of regulatory burden, reducing costs to industry and, at the same time, specifying relevant aviation safety standards.

Why are we consulting

CASA is working to improve Safety Management System (SMS) legislation with the aim of achieving a positive outcome for the aviation industry and for CASA.

We invite the aviation community to review the proposed policy in relation to their industry sector and to tell us about any concerns or challenges they have regarding these proposed amendments. We also invite industry to highlight any improvements that should be considered for this amendment or be considered for future development of SMS legislation.

This policy proposal summarises the proposed Part 5 of CASR and MOS—these proposals are mentioned in terms of broad policy or broad action rather than specific wording. The exact wording will be addressed during subsequent legislative drafting. An Exposure Draft of the amendment regulations will be made available later, prior to changes coming into effect.

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1 Reference material

1.1 Acronyms

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

Table 1: Acronyms

Acronym	Description
AC	advisory circular
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
ICAO	International Civil Aviation Organization
ICG	industry consultation group
MOS	Manual of Standards
SARPs	Standards and Recommended Practices
SMS	safety management system
SSP	State Safety Programme
QMS	Quality Management System

1.2 Definitions

Terms that have specific meaning within this PP 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 PP and the civil aviation legislation, the definition in the legislation prevails.

Table 2: Definitions

Term	Definition
human performance	Human capabilities and limitations which have an impact on the safety and efficiency of aeronautical operations.
safety	The state in which risks associated with aviation activities, related to, or in direct support of the operation of aircraft, are reduced and controlled to an acceptable level.
safety management system	A systematic approach to managing safety, including the necessary organisational structures, accountability, responsibilities, policies and procedures.

1.3 References

Legislation

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

Table 3: Legislation references

Document	Title
Subpart 139.H of CASR	Aerodrome rescue and firefighting services
Part 171 of CASR	Aeronautical telecommunication service and radionavigation service providers
Part 172 of CASR	Air Traffic Service Providers
Part 173 of CASR	Instrument flight procedure design
Part 175 of CASR	Aeronautical information management
Manual of Standards Part 139H	Standards Applicable to the Provision of Aerodrome Rescue and Fire Fighting Services
Manual of Standards Part 171	Aeronautical Telecommunication and Radio Navigation Services
Manual of Standards Part 172	Air Traffic Services
Manual of Standards Part 173	Standards Applicable to Instrument Flight Procedure Design

Advisory material

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

Table 4: Advisory material references

Document	Title
Multi-Part AC 139.H-06, AC 143-01, AC 171-06, AC 172-06, AC 173-07 and AC 175-01	Guidelines for preparing a safety management system
CASA SMS kit	Safety management systems kit

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 5: ICAO references

Document	Title
ICAO Annex 19	Safety Management
ICAO Doc 9859	Safety Management Manual
ICAO Doc 10159	Safety Intelligence Manual

2 Introduction

2.1 Background

Within Australia, SMS have been phased into the aviation industry since the early-2000s. They are currently regulated by various pieces of legislation (the *Civil Aviation Safety Regulations 1998*, (CASR)) according to each industry sector. SMS requirements have evolved during this time resulting in different legislative requirements for the different industry sectors.

Annex 19 to the Convention on International Civil Aviation (the Chicago Convention), Safety Management (ICAO Annex 19), provides Standards and Recommended Practices (SARPs) for a consistent set of international standards relating to SMS. Annex 19 identifies what an SMS shall and should cover across both Chapter 4 and in Appendix 2. Annex 19 paragraph 4.1.1 states the SMS of each service provider shall:

- be established and managed in accordance with the SMS framework contained in Appendix 2
- cover a defined scope of products or services
- be supported by a system description, including the identification of relevant organisational interfaces.

While 4.1.2 identifies that the State shall ensure that each service provider develops a plan to facilitate SMS implementation. With a recommendation at 4.1.3 that in the establishment and management of an SMS, specific consideration should be given to human performance implications.

Appendix 2 of the Annex specifies the framework for the implementation and maintenance of an SMS. The framework comprises four components and twelve elements as the minimum requirements for SMS and prescribes further matters that each element must address. Additionally, Annex 19 Chapter 5 and Appendix 3, outlines the need for States to protect safety data, safety information and related sources.

In 2024 Annex 19 underwent a revision, resulting in Annex 19 Amendment 2, to be effective on 4 November 2025 and applicable on 26 November 2026. Amendment 2 is an evolution of the safety management SARPs and is intended to support States and service providers in the effective implementation of State Safety Programme (SSP) and SMS.

Post the amendment to Annex 19, a review of Australia's current SMS regulations against Annex 19 Amendment 2 SMS framework, was conducted. This review highlighted current SMS requirements mandated within Parts 139.H, 171, 172, 173 and 175 of CASR have significant levels of differences to the ICAO SMS framework.

While at the time Parts 139.H, 171, 172, 173 and 175 of CASR SMS requirements initially came into effect they were in line with common safety management principles these CASRs have not kept pace with recognised international safety standards and practices. The current SMS requirements have served their purpose since introduction; however, it has become apparent to CASA that the Australian SMS regulatory requirements and standards within these authorisations:

- do not completely address contemporary requirements for safe provision of aviation services, particularly new international safety standards introduced since 2024
- differing SMS standards were required for authorisation holders across these CASRs
- do not align with contemporary conventions, practices and standards used in regulations introduced by CASA in recent years.

To address these matters, CASA is using Part 5 and its accompanying Manual of Standards (MOS), aiming to provide a single source of SMS requirements, aligned and compliant with ICAO Annex 19, thereby enabling a more consistent ruleset. As the requirements for SMS across authorisations would be standardised, administration would become simpler and easier for aviation organisations that manage several parts of their operation under the one SMS.

It is also noted that currently none of the SMS related CASRs require the protection of safety data, safety information and related sources. Part 5 of CASR aims to include a section directly related to the protection of safety data and information, in accordance with Annex 19 Appendix 3.

3 Regulatory issues

In 2015, CASA determined that all SMS requirements should be standardised in accordance with Annex 19. Accordingly, a new Part of the CASRs would be created and provide a single and consistent source of SMS requirements. In 2021, CASA Part 5 project team was brought together to progress the making and implementation of Part 5 of CASR. However, in 2022 the Part 5 project was paused due overall impact to industry for a single holistic transition to Part 5.

In 2025 post the amendment to Annex 19, a gap analysis and review of Australia's current SMS regulations against compliance with ICAO Annex 19 Amendment 2 SARPs concerning the SMS framework, was conducted. This review highlighted five current SMS related CASRs have significant levels of differences to the ICAO SMS framework, where in some instances entire SMS elements are non-existent within the CASRs.

Given this a CASA Part 5 project team commenced, but with a focus on transitioning the CASRs with the greatest degree of differences to Annex 19 to Part 5 initially. With the proposed Part 5 of CASR and its associated Manual of Standards (MOS) to be initially applicable for a limited scope of those authorisation holders who already have SMS requirements mandated within Parts 139.H, 171, 172, 173 and 175 of CASR.

With Parts 139.H, 171, 172, 173 and 175 of CASR, and where applicable associated MOSs, to be amended directing authorisation holders required to have an SMS to do so in accordance with Part 5 of CASR.

The implementation of Part 5 is currently recommended only for authorisation holders already with SMS requirements to minimise the policy impact to industry. However, when Part 5 is implemented, it will assist future expansions with the applicability of SMS regulations as any new industry sector regulatory requirements for SMS the relevant CASR can direct to Part 5.

4 Review and prior consultation activity

4.1 Previous consultations

The proposed Part 5 of CASR was provided to the Part 5 industry consultation group (ICG), being a group of identified authorisation holders impacted by the initial planned transition to Part 5. Outlining the Part 5 of CASR background, objectives, and proposed drafts of Part 5 of CASR and its associated MOS. To allow for directed industry consultation and feedback into the proposals, prior to engaging in broader public consultation.

While also allowing for consideration as to realistic timelines to assist authorisation holders with the transition to Part 5, to ensure the desired safety improvements can be achieved.

A separate Part 5 introductory briefing virtual meeting, as well as email correspondence, was held on 8 July 2026 with the Part 5 ICG. To introduce the background and purpose of Part 5 prior to the ICG being provide with the opportunity to review and give feedback on the proposed Part 5.

5 Impacts on industry

5.1 Authorisation holders

The most significant impact on Parts 139.H, 171, 172, 173 and 175 authorisation holders will be the administrative effort necessary to update their document suite and operating procedures. Accordingly, CASA proposes a 2-year transitional program to enable orderly transition to any new processes.

The current SMS requirements contained within Parts 139.H, 171, 172, 173 and 175 of CASR will be amended and replaced with a requirement for authorisation holders to have an SMS in accordance with Part 5 of CASR.

Replacing the existing Parts 139.H, 171, 172, 173 and 175 of CASR SMS standards in favour of a single harmonised ICAO standard should not require substantial changes to authorisation holders' operational practices. The new requirements for safety management should not have a significant impact because these authorisation holders already have SMS requirements, which have included the need for continuous improvement in safety performance.

Within Part 173 and Part 175 of CASR there is an additional requirement within the SMS regarding a quality management system (QMS) based on those elements of ISO 9001 relevant to instrument flight procedure design, aeronautical information management and data service providers, and compliance with all relevant CASA, ICAO, internal, and other safety related standards. This QMS-SMS aspect is not contained within ICAO Annex 19. However, CASA recognises the benefits of this additional requirement relating to QMS-SMS interfaces and intends to maintain it. This will be managed via an amendment to Part 173 and Part 175 to include a requirement for a QMS that interfaces with their Part 5 SMS. The amendment should not have any impact given Part 173 and 175 authorisation holders already have the QMS-SMS requirement.

The current Part 5 proposal will apply initially to only those authorisation holders under Parts 139.H, 171, 172, 173 and 175 of CASR, where SMS is already a regulatory requirement. Potentially it could also apply later, if deemed appropriate, to authorisation holders under Parts 119, 138, 139, 142, 145 and 149 of CASR, where SMS is already a regulatory requirement.

5.2 Community

The aviation community should experience little or no impact as a result of the changes proposed in this policy proposal.

6 Implementation and transition

6.1 Implementation considerations

CASA is working towards a commencement date of H2 2027. This date range is dependent on when CASA gains the necessary drafting resources and the time required to draft and consult on the final changes.

Further once Part 5 of CASR and its associated MOS is made into legislation, supporting guidance material in the form of an advisory circular (AC) is intended to be provided to industry to assist in transitioning to Part 5. A Part 5 AC would repeal the current [Multi-Part AC 139.H-06, AC 143-01, AC 171-06, AC 172-06, AC 173-07 and AC 175-01 - Guidelines for preparing a safety management system](#), in accordance with the amendments to Subpart 139.H, Parts 171, 172, 173 and 175 of CASR, SMS requirements.

6.2 Transitional considerations

CASA proposes a 2-year transitional program to enable the Subpart 139.H, Parts 171, 172, 173 and 175 of CASR authorisation holders to update their documents and procedures.

7 Closing date for comment

CASA will consider all comments received as part of this consultation process and will incorporate changes to the regulation as appropriate while still aiming to maintain alignment with ICAO Annex 19. Comments on the draft new policy should be submitted through the online response form by close of business 11 November 2026.