



ICAO

Doc 10055

Manual on Notification and Publication of Differences

First Edition, 2019



Approved by and published under the authority of the Secretary General

INTERNATIONAL CIVIL AVIATION ORGANIZATION



| ICAO

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FOREWORD

BACKGROUND

Article 38 of the *Convention on International Civil Aviation* (hereinafter referred to as the “Chicago Convention”) states:

“Any State which finds it impracticable to comply in all respects with any such international standard or procedure, or to bring its own regulations or practices into full accord with any international standard or procedure after amendment of the latter, or which deems it necessary to adopt regulations or practices differing in any particular respect from those established by an international standard, shall give immediate notification to the International Civil Aviation Organization of the differences between its own practice and that established by the international standard...”

Although differences from Recommended Practices are not notifiable under Article 38 of the Convention, States have been urged to do so by the Assembly.

However, according to the results of activities conducted under both the Universal Safety Oversight Audit Programme (USOAP) and the Universal Security Audit Programme (USAP), the status of the notification and publication of differences has been far from satisfactory: more than 70 per cent of the States had not established an effective system for the identification and notification of differences to ICAO. In view of the importance of the subject, a comprehensive study on the issues surrounding the topic was conducted by the Filing of Differences Task Force (FDTF) with an aim to improving relevant rules and procedures and providing additional guidance to assist Contracting States. The Council was informed through C-WP/13954 of the main outcomes of the comprehensive study that reported on: a) issues in respect of the notification and publication of differences; b) recommendations made by the FDTF; and c) actions being taken by the Secretariat.

The outcomes of the study were also reported to the 38th Session of the Assembly (A38-WP/48) and resulted in the adoption of Resolution A38-11 entitled *Formulation and implementation of Standards and Recommended Practices (SARPs) and Procedures for Air Navigation Services (PANS) and notification of differences*. A38-11 was subsequently superseded by A39-22, with the same title, at the 39th Session of the Assembly.

One of the key clauses in the Resolution was the provision of more guidance in respect of the notification and publication of differences (Resolving Clause 15 refers). A thorough review was carried out of the existing ICAO guidance related to differences. It was evident that more clarity and consistency in guidelines were required as to what constitutes a difference and additional guidance material would be needed to help Contracting States to fulfil their obligations regarding the identification and notification of differences.

Pursuant to this Resolution and in order to provide States with more clarity and consistency in the identification and reporting of differences, the Secretariat with the assistance of the FDTF members prepared an amendment to the Note on Notification of Differences (“Note”). The proposed amendment was circulated for comments through State letter AN 1/1-14/66 dated 26 September 2014 and State letter AN 1/1-15/73 dated 23 October 2015.

The responses to the State letters were reviewed by the Air Navigation Commission, the Air Transport Committee and the Committee on Unlawful Interference, after which the Council agreed to an amendment to the Note at the sixth meeting of its 207th Session on 26 February 2016. In doing so, the Council highlighted the importance of the development of a manual to provide guidance to States on the subject.

SCOPE AND PURPOSE

The purpose of this document is to supplement the Note, which is the primary guidance to assist States in carrying out their obligations regarding Article 38 of the Convention. It should also be observed that guidance is provided to States and not directly to third parties or regional organizations that may have a role in the manner in which a State meets its Article 38 obligations – as such arrangements are considered as internal to the State, or States concerned.

FUTURE DEVELOPMENTS

In order to keep this manual relevant and accurate, suggestions for improving it in terms of format, content or presentation are welcome. Any such recommendation or suggestion will be examined and, if found suitable, will be included in regular updates to the manual. Regular revision will ensure that the manual remains both pertinent and accurate.

Comments concerning the manual should be addressed to:

The Secretary General
International Civil Aviation Organization
999 Robert-Bourassa Boulevard
Montréal, Quebec
Canada H3C 5H7

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ABBREVIATIONS AND ACRONYMS

(used in this manual)

| | |
|-------|---|
| AIP | Aeronautical Information Publication |
| EFOD | Electronic Filing of Differences |
| ICAO | International Civil Aviation Organization |
| PANS | Procedures for Air Navigation Services |
| SARPs | Standards and Recommended Practices |
| SUPPs | Regional Supplementary Procedures |

PUBLICATIONS

(referred to in this manual)

Annexes to the Convention

Convention on International Civil Aviation (Doc 7300)

Aeronautical Information Services Manual (Doc 8126)

Safety Oversight Manual, Part A — The Establishment and Management of a State Safety Oversight System (Doc 9734)

Chapter 1

OBLIGATIONS AND REQUIREMENTS RELATED TO DIFFERENCES

1.1 GENERAL

1.1.1 Article 1 of the *Convention on International Civil Aviation* (Chicago Convention) underlines that every State has complete and exclusive sovereignty over the airspace above its territory.

1.1.2 In accordance with Article 37 of the Chicago Convention, each Contracting State undertakes to collaborate in securing the highest practicable degree of uniformity in all matters in which such uniformity facilitates and improves air navigation.

1.1.3 To this end, the International Civil Aviation Organization (ICAO) adopts and amends from time to time, as may be necessary, international Standards and Recommended Practices (SARPs) and procedures dealing with matters concerned with safety, regularity and efficiency of air navigation.

1.1.4 SARPs are adopted by the Council in accordance with Articles 37, 54 and 90 of the Chicago Convention and are designated, for convenience, as Annexes to the Convention.

1.1.5 The Chicago Convention does not define the terms "Standard" or "Recommended Practice". Definitions were first adopted by the Assembly in 1947 (A1-31), which has been incorporated in and superseded by subsequent Assembly Resolutions. These definitions were then incorporated, by way of Council Decision, into the foreword of the individual Annexes. As they had thus become part of the Annex documentation formally approved by the Council, the definitions subsequently were removed from the relevant Assembly Resolution.

1.1.6 The original A1-31 definition stated that the uniform application by Contracting States of the specifications contained in the international standards is recognized as necessary for the safety or regularity of international air navigation while the uniform application of the specifications in the recommended practices is regarded as desirable in the interest of safety, regularity or efficiency of international air navigation. The definitions for "Standards" and "Recommended Practices" for Annex 9 — *Facilitation* (FAL) are slightly different and explained further in the next paragraph.

1.1.7 The definitions of the terms "Standard" and "Recommended Practice" in Annex 9 were unanimously arrived at by the Air Transport Committee after thorough discussions in a working group and at several meetings of the full committee. The nature of the FAL provisions require that the Standards and Recommended Practices (SARPs) be based on the general concept of "uniformity which will facilitate and improve air navigation", as stated in the opening words of Article 37 rather than on the more specific items of "safety, regularity and efficiency" mentioned towards the conclusion of Article 37 (Doc 6764 (C/780)).

1.2 ARTICLE 38 OF THE CONVENTION ON INTERNATIONAL CIVIL AVIATION

While the implementation of Standards is considered, by definition, as necessary, the Chicago Convention also recognizes, through Article 38, that there are instances when this is impracticable or it is necessary to adopt regulations or practices differing from those established by Standards.

1.2.1 Article 38 of the Chicago Convention states:

Any State which finds it impracticable to comply in all respects with any such international standard or procedure, or to bring its own regulations or practices into full accord with any international standard or procedure¹ after amendment of the latter, or which deems it necessary to adopt regulations or practices differing in any particular respect from those established by an international standard, shall give immediate notification to the International Civil Aviation Organization of the differences between its own practice and that established by the international standard. In the case of amendments to international standards, any State which does not make the appropriate amendments to its own regulations or practices shall give notice to the Council within sixty days of the adoption of the amendment to the international standard, or indicate the action which it proposes to take. In any such case, the Council shall make immediate notification to all other states of the difference which exists between one or more features of an international standard and the corresponding national practice of that State.

1.2.2 In accordance with Article 38, a Contracting State must notify ICAO at all times (or at any time) if it does not comply with a Standard in all respects; does not bring its regulations or practices into full accord with any Standard; or adopts regulations or practices differing in any particular respect from the Standard.

1.2.3 The Resolutions of Adoption of Annex 2 — *Rules of the Air*, Annex 3 — *Meteorological Service for International Air Navigation* and Annex 5 — *Units of Measurement to be Used in Air and Ground Operations*, approved by the Council at the twenty-second meeting of its Third Session further defined “differences” as covering “*non-compliance in any respect*” with a Standard.

1.2.4 The following provides a non-exhaustive list of scenarios that present circumstances requiring the notification of a difference:

- a) *A situation in which the State does not bring its practices into full accord with the Standard.* For example, when a Contracting State has incorporated a Standard into its national regulations, but has only partially implemented or applied it in practice.
- b) *A situation in which the State’s regulation (or lack thereof) differs from the Standard.* For example, when a Contracting State applies a Standard in practice, but has not incorporated it into its national regulations.
- c) *A situation in which the State does not comply with a Standard in all respects.* For example, when a Contracting State has not incorporated a Standard into its national regulations and not implemented or applied it in practice.

1.2.5 There can be circumstances when a State has temporary or short-term differences (e.g., exemptions/exceptions). In such cases, States need to be encouraged to notify differences and provide such information through other means, such as a Notice to Airmen (NOTAM) or an Aeronautical Information Circular (AIC) in accordance with Annex 15 — *Aeronautical Information Services*. Article 38 expressly requires that States immediately notify ICAO of differences, without exception. Therefore, whatever other actions States may take in regard to temporary or short-term differences, they would not serve to relieve States of their obligations under Article 38.

1.2.6 It should be noted that the notification of differences does not relieve a State of its obligations as per the Chicago Convention and may still result in a Universal Safety Oversight Audit Programme (USOAP) finding related to the specific SARP.

¹ The word “procedure” in Articles 37 and 38 of the Chicago Convention does not refer to Procedures for Air Navigation Services (PANS) or Regional Supplementary Procedures (SUPPs). The drafters of the Chicago Convention had only envisaged international Standards and Recommended Practices (SARPs) embracing a variety of material, including specifications for equipment, procedures (for communications and air traffic control, for example) and practices (C/817).

1.3 ASSEMBLY RESOLUTION

While Article 38 sets out obligations for the notification of differences against Standards, it is recognized that knowledge of differences from Recommended Practices may also be important for the safety, regularity and efficiency of air navigation. The ICAO Assembly has resolved that the Council should urge Member States to notify the Organization (ICAO) of any differences that exist between their national regulations and practices and the provisions of SARPs, as well as the date or dates by which they will comply with the SARPs (Assembly Resolution A39-22).

1.4 REQUIREMENTS OF ANNEX 15

1.4.1 Annex 15 — *Aeronautical Information Services*, 5.2.2 states:

AIP shall include:

...

- c) a list of significant differences between the national regulations and practices of the State and the related ICAO Standards, Recommended Practices and Procedures, given in a form that would enable a user to differentiate readily between the requirements of the State and the related ICAO provisions;
- d) the choice made by a State in each significant case where an alternative course of action is provided for ICAO Standards, Recommended Practices and Procedures.

1.4.2 The purpose of the publication of significant differences in the AIP is, primarily, to provide flight crews, and other stakeholders, with information which is essential to international operations, and which is not readily available. More guidance on significant differences can be found in *Aeronautical Information Services Manual* (Doc 8126).

1.5 PURPOSE AND BENEFITS OF NOTIFYING DIFFERENCES

1.5.1 The primary purpose of notifying differences is to promote safety, efficiency and regularity in air navigation by ensuring that all stakeholders concerned with international civil aviation are aware of all national rules and practices insofar as they differ from those prescribed in SARPs. Therefore, lack of information on differences creates uncertainty and poses a potential hazard to the safety, regularity and efficiency of air navigation.

1.5.2 Dissemination of differences enhances transparency of safety information, and, consequently, facilitates States' decisions specifically within the context of the management of safety. Incorrect notification of differences may also potentially lead to misunderstandings and could result in undesirable operational situations, or in other potential negative consequences in terms of recognition of certificates and licences, ramp inspections, and ultimately traffic rights.

1.5.3 The notification of differences is, therefore, an important and useful action that contributes to ensuring the safe and orderly growth of international civil aviation.

Chapter 2

DETERMINATION OF DIFFERENCES

2.1 ANNEX COMPONENTS TO WHICH THE NOTIFICATION OF DIFFERENCES PROCESS APPLY

2.1.1 The foreword to the Annexes describes the components that are considered as material comprising the Annex. The descriptions as well as the application of the obligations related to the filing of differences to these are as follows:

- a) *Standard*. Any specification for physical characteristics, configuration, material, performance, personnel or procedures, the uniform application of which is recognized as necessary for the safety or regularity of international air navigation and to which Contracting States will conform in accordance with the Convention; in the event of non-compliance, notification to the Council is compulsory under Article 38.
- b) *Recommended Practice*. Any specification for physical characteristics, configuration, material, performance, personnel or procedures, the uniform application of which is recognized as desirable in the interest of safety, regularity or efficiency of international air navigation, and to which Contracting States will endeavour to conform in accordance with the Convention; in the event of non-compliance notification to the Council is encouraged under Assembly Resolutions.
- c) *Appendices*. Material grouped separately for convenience but forming part of the SARPs adopted by the Council. The notification of differences therefore applies to appendices. In order to file a difference against an appendix, States should file a difference against the SARPs that make reference to the Appendix.
- d) *Definitions*. These do not have independent status but are an essential part of each SARP in which the term is used, since a change in the meaning of the term would affect the specification. Therefore, differences against definitions should be notified. Once a difference against a definition has been notified, differences against the SARPs using that definition should be notified as well. Attention is drawn to the possible far-reaching consequences of adopting a definition differing in substance from an Annex definition.
- e) *Tables and figures*. These add to or illustrate a SARP and form part of the associated SARP and have the same status. The notification of differences therefore applies to such tables and figures. In order to file a difference against a table or figure, States should file a difference against the SARP that makes reference to the table or figure.

2.1.2 The notification of differences process does not apply to forewords, introductions, notes and attachments.

2.2 NOT APPLICABLE SARPS

While most SARPs are applicable to all States, some SARPs may only apply to some States. For instance, Annex 3 contains provisions that apply only to States that have accepted the responsibility for providing a world area forecast centre (WAFC) within the framework of the world area forecast system. Likewise, Annex 8 — *Airworthiness of Aircraft*

contains provisions that apply to the State of Design of a particular aircraft type. In such cases, States do not have to notify differences against that SARP that is not applicable to them. They are, however, required to indicate that the SARP is not applicable when filing their differences to the Annex.

2.3 GENERAL GUIDELINES REGARDING THE DETERMINATION OF DIFFERENCES

2.3.1 When determining whether a difference with a SARP exists, the State should assess to what extent the conditions in Articles 38 are met. To this end, the following should be considered.

2.3.2 Compliance with SARPs may be regarded, in general, as having two main characteristics. The first comprises the administrative arrangements necessary to bring the ICAO requirements into force within the State; the second consists of the necessary practical arrangements such as the provision of facilities, personnel, equipment, guidance, and enforcement mechanisms necessary to ensure effective implementation of the SARP.

2.3.3. Therefore, implementation of a Standard, in general, can only be considered satisfactory when suitable administrative and practical arrangements exist. For instance, when an administrative arrangement, bringing the regulation into force, is in place but not applied in practice, or when no suitable administrative arrangement exists even though some practical implementing activities take place, the State should notify a difference to the corresponding Standard until compliance is achieved.

2.3.4 Implementation of Recommended Practices is recognized as desirable in the interest of safety, regularity or efficiency. If a State chooses to implement a particular Recommended Practice, it should have a requirement with sufficient administrative force. For instance, Annex 10 — *Aeronautical Telecommunications*, Volume I — *Radio Navigation Aids*, Recommended Practice 2.1.4.2 states:

Recommendation.— *A State that approves GNSS-based operations should ensure that GNSS data relevant to those operations are recorded.*

If a State decides to implement this Recommended Practice, it should issue a national requirement in order to ensure that GNSS-based operations data are recorded.

2.3.5 Therefore, if a State has determined that it has implemented the SARP through sufficiently robust administrative arrangements (such as regulations, or other documents carrying sufficient administrative force), and that those arrangements are enforced and implemented, the State does not need to notify ICAO of any differences since it “complies in all respects” with the ICAO requirement and has brought its “regulations and practices” into full accord with it.

2.3.6 The determination of differences should be performed by the State regulatory authorities and in keeping with the State commitment, as a Contracting State, to comply with the Convention.

2.3.7 According to Doc 8126, any deviation from provisions¹ that needs to be taken into account in aircraft operations should constitute a “significant difference” and be published in the AIP.

¹ To any of the International Standards; Recommended Practices that are important for the safety of air navigation or, in the case of facilitation, for the speedy handling and clearance through customs, immigration, etc. of aircraft and the loads they carry; Procedures for Air Navigation Services (PANS) that are important for the safety of air navigation; and Regional Supplementary Procedures (SUPPs) that are important for the safety of air navigation.

2.4 CATEGORIES AND DESCRIPTIONS OF DIFFERENCES

2.4.1 Categories of differences

2.4.1.1 As notifications of differences may correspond to different scenarios, the following categories of differences are provided as a guide in determining whether a difference in the context of Article 38 exists:

- a) *A Contracting State's requirement is more exacting or exceeds the SARP (Category A).* This category applies when the national regulation and practices are more demanding than the corresponding SARP, or impose an obligation within the scope of the Annex which is not covered by the SARP. This is of particular importance where a Contracting State requires a higher standard which affects the operation of aircraft of other Contracting States in and above its territory;

Example:

| Annex reference | Provision | Text of the difference | Comments, including the reason for the difference |
|------------------|--|---|--|
| Annex 2, 3.3.1.3 | A flight plan shall be submitted, before departure, to an air traffic services reporting office or, during flight, transmitted to the appropriate air traffic services unit or air-ground control radio station, unless arrangements have been made for submission of repetitive flight plans. | For flights crossing international borders, the flight plan should be submitted at least 30 minutes prior to departure. | This additional requirement is necessary for the air traffic flow management system and procedures used (in the State notifying the difference). |

- b) *A Contracting State's requirement is different in character or other means of compliance (Category B).* This category applies when national regulation and practices are different in character from the corresponding SARP, or when the national regulation and practices differ in principle, type or system from the corresponding SARP, without necessarily imposing an additional obligation. The expression "different in character or other means of compliance" in b) would be applied to a national regulation and practice which achieves, by other means, the same objective as that of the corresponding ICAO SARPs and so cannot be classified under a) or c); and

Example:

| Annex reference | Provision | Text of the difference | Comments, including the reason for the difference |
|-----------------|---|---|---|
| Annex 3, 6.5.3 | Area forecasts for low-level flights prepared in support of the issuance of AIRMET information shall be issued every 6 hours for a period of validity of 6 hours and transmitted to meteorological watch offices and/or aerodrome meteorological offices concerned not later than one hour prior to the beginning of their validity period. | The area forecasts are issued every 3 hours instead of 6 hours, from 0700 to 2200 local time, and once at 0100 with a validity of 6 hours (until 0700). | The frequency and issuance periods are considered to offer a better benefit/cost ratio. |

- c) *A Contracting State's requirement is less protective or partially implemented/not implemented (Category C).* This category applies when the national regulation and practices are less protective than the corresponding SARP; when no national regulation has been promulgated to address the corresponding SARP, in whole or in part; or when the Contracting State has failed to bring its practices into full accord with the corresponding SARP.

Example:

| Annex reference | Provision | Text of the difference | Comments, including the reason for the difference |
|------------------|---|---|--|
| Annex 11, 2.33.1 | Each prohibited area, restricted area, or danger area established by a State shall, upon initial establishment, be given an identification and full details shall be promulgated. | Even though this standard is implemented in practice, it has not been incorporated into national regulations. | Incorporation is planned for the 2018 air traffic services code of regulations update. |

2.4.2 Description of differences

2.4.2.1 Differences in substance should be described clearly and concisely, and should allow the reader to easily grasp the scope of the differences. In general, the description should not be a copy of the national requirement, leaving it up to the reader to identify the differences between the ICAO and national requirement(s), but rather a description of the variances. States are encouraged to view differences filed by other States (available from the Online Framework of the Universal Safety Oversight Audit Programme (<http://www.icao.int/usoap>)) for further examples.

Chapter 3

NOTIFICATION AND PUBLICATION OF DIFFERENCES

3.1 WHEN TO NOTIFY DIFFERENCES

3.1.1 ICAO informs Contracting States and international organizations, by State letter, of the adoption of the amendment and requests for notification of any disapproval, and differences, before given dates.

3.1.2 In accordance with Article 90 of the Chicago Convention the amendment will become effective three months after the issuance of the State letter, except for any part thereof for which a majority of the Contracting States have registered their disapproval with the Council.

3.1.3 Amendments, or such parts thereof as have become effective, will become applicable on dates set by the Council. States are expected to comply with and implement all parts of the amendment that are applicable to them.

3.1.4 States are advised, by ICAO electronic bulletin, as soon as amendments have become effective. States are encouraged, however, not to wait until then to start preparing for implementation of the amendment, and notification of differences.

3.1.5 The Council defines the date by which Contracting States are requested to notify ICAO of the differences between its national regulations or practices and the amended SARPs (Resolution of Adoption).

3.1.6 States are requested to provide updates of the differences previously notified after each amendment, as appropriate, until the difference no longer exists.

3.2 MEANS OF NOTIFICATION

3.2.1 Differences can be notified by sending to ICAO a *Form on Notification of Compliance With or Differences* (paper-based process), which is appended to all ICAO State letters notifying States of the adoption of an amendment; or through the Electronic Filing of Differences (EFOD) system at www.icao.int/usoap.

3.2.2 The EFOD system, launched on 1 April 2011, is a web-based tool that allows Contracting States to notify differences information and facilitates the sharing of information between States through ICAO. Once completed, the EFOD system gives States personnel convenient access to a repository of compliance and difference information, which has been previously entered. The system also provides additional information and functionality such as:

- a) the latest ICAO provisions for which a refiling of differences is required;
- b) remarks which can help State staff in managing compliance with individual SARPs and in passing on knowledge to incoming staff;
- c) statistical data which provides a “big picture” overview of the situation in the State; and
- d) differences information from other States.

3.2.3 While the paper-based process employing the *Form on Notification of Compliance With or Differences* is still the primary means, Contracting States have been encouraged to transition to using the EFOD system in order to address issues associated with the timeliness of the notification and/or dissemination of differences, as provided in Article 38 of the Chicago Convention.

Chapter 4

PROCESS AND PROCEDURES FOR MANAGEMENT OF DIFFERENCES

4.1 GENERAL

4.1.1 In order to keep the status of differences up-to-date, Contracting States must be properly organized and staffed with qualified personnel capable of accomplishing these tasks (see *Safety Oversight Manual, Part A – The Establishment and Management of a State Safety Oversight System*, (Doc 9734) for further guidance).

4.1.2 Determination of differences, their clear and concise description and notification require, among other things, a good knowledge and understanding of:

- a) ICAO requirements, guidance, templates and tools regarding notification of differences;
- b) national regulatory context and the corresponding SARPs; and
- c) national practices, namely the level of implementation of SARPs in the State.

4.1.3 Ideally, when national regulations are drafted, regulators should keep in mind that differences will have to be determined and notified at some point, if applicable. Regulators might even find it advantageous to identify and formulate differences when the national rules are being drafted or amended, since identifying the level of compliance with or departure from SARPs is important to consider. Such an approach can facilitate compliance with the SARPs and notification of differences, if required.

4.1.4 As previously stated, the degree or alignment, or non-alignment, of national legislation and regulations with ICAO SARPs may significantly influence the complexity of the determination and formulation of differences. While notification of differences may be perceived as a tedious task, it represents only a fraction of the work and time needed for implementing SARPs (drafting of national legislation, regulations, rules and associated material, information of regulated entities, enforcement of rules etc.). Similarly, the process should be performed for the procedures.

4.2 PROCESS FOR THE DETERMINATION AND NOTIFICATION OF DIFFERENCES

4.2.1 For a Contracting State to fulfil their obligations regarding notification of differences, an appropriate process needs to be established and implemented consistent with the State's regulatory and organizational frameworks, and with the necessary resources made available for the effective implementation of the process, in particular for the effective identification of all existing differences.

4.2.2 In order to file differences successfully and cost-effectively, States are encouraged to set up, and apply, a simple, suitable procedure for notifying differences. Such a procedure might:

- a) identify a focal point in the State (it can be an individual or a section) for processing ICAO State letters related to amendments to Annexes, including proposals for the amendment and notification of differences;
- b) identify the expert units corresponding to each Annex and ensure the participation of all relevant entities and experts, including legal and technical experts;

- c) direct the focal point to distribute, as soon as practicable, the State letters related to proposal for the amendment to appropriate State experts having competence for the corresponding ICAO provisions;
- d) give authority to the focal point to request from the relevant entities and experts required inputs within a particular time frame (e.g. one month prior to the ICAO deadline), and require that differences to be added or removed outside the amendment State letter cycle be provided to the focal point entity in a timely fashion. Entry of data into the EFOD system by the expert or experts might qualify as provision of required inputs to the focal point; and
- e) when notifying differences, the following information should be provided:
 - 1) the number of the paragraph or subparagraph as amended which contains the SARP to which the difference relates;
 - 2) the reasons for the difference why the State does not comply with the SARP, or considers it necessary to adopt different regulations or practices;
 - 3) a clear and concise description of the difference; and
 - 4) intentions for future compliance and any date by which the State plans to confirm compliance with and remove its difference from the SARP for which the difference has been notified (Note on the Notification of Differences).

— END —

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