24th COSCAP-SA STEERING COMMITTEE MEETING

Implementation of SARI Parts – The Maldives Story

Information Paper 03 (IP-03)

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SUMMARY

The purpose of this paper is to give COSCAP-SA member states a brief summary on the implementation of SARI Parts in the Maldives and share our 'lessons learned' as requested at the 8th COSCAP NC Meeting.

1. Background – The Maldives

1.1 The Maldives is an archipelago of 1,190 coral islands scattered across 900 km of the Indian Ocean. It is one of the smallest countries in Asia and the Pacific by population (341, 256) and land area (300 km^2).

1.2 The main economic activity of the Maldives is tourism which accounts 35% of the GDP[1]. Except for a negligible percentage, all of the tourists arrive in the Maldives by air[2].

1.3 The combined direct, indirect and induced effects of travel and tourism represent 53.7% of the Maldivian GDP[3].

1.4 The serious geographical challenges combined with dependency on tourism has made air transport critical to the Maldivian economy.

2. Background – the Regulatory Framework

2.1 Maldives is a signatory to the Chicago Convention. It is obliged to comply with all the 19 Annexes to the Convention.

2.2 A 2005 review of the regulations (in preparation for the CSA audit cycle) revealed very poor[4] implementation of ICAO minimum standards.

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[1] Maldives: Overcoming the challenges of a small island state sec. 1.3, Asian Development Bank, 2015

[2] Tourist arrivals to the country is compiled by air only.

[3] Economic Benefits from Air Transport in the Indian Ocean Islands sec. 2.2.2, Oxford Economics, 2011

[4] Regulation Change Project sec. 1, CAA Maldives, 2005

3. Background – a detour

3.1 The change formula is:

Change = f (D x V x P) > C_o

Where;
D = Dissatisfaction with the status quo
V = Vision of the future
P = Process that remove the obstacles
C_o = Cost of change

3.2 In Maldives, during 2005, there was immense dissatisfaction with the status quo. Further, the financial risks to the Maldives far outweighed the cost of moving to a new regulatory framework as shown by accidents of the 1990s.

3.2 At the same time, if one of the factors is absent (zero), the product will be zero and hence change will not be possible.

4. Implementation Summary

4.1 The regulation change project was commissioned by the DG in August 2005. It was envisioned that by the end of the project Maldives will have a world class regulatory framework that implements the ICAO annexes and supports the economic development of Maldives.

4.2 Regulatory frameworks from Europe, FAA, Australia, New Zealand and model regulations were reviewed. EASA rules were finally selected partly because of the BCAR history and partly because of ecosystem, flexibility and interoperability reasons.

4.3 The Airworthiness set of regulations were issued in 2007 with a two year implementation period and most maintenance and maintenance management organisations were approved in December 2008.

4.4 SARI was instrumental in going beyond just the text of the regulations and applying the regulation as it was meant.

4.5 A major part of SARI Parts implementation, i.e. harmonisation of Section B (or Authority Procedures), is ongoing. These are internal procedures as of now and ground work has been laid to implement them at regulatory level.

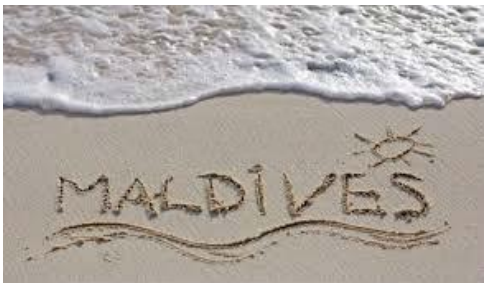
4.6 Maldives is ahead of SARI on Section A (or Technical Requirements) of the SARI Parts due to variations in implementation speed of different SARI member states.

4.7 The Flight Operations set of regulations were issued late 2014 with a two year implementation period. In September 2015, Maldives and EASA have signed a contract to support adaptation of EASA Air Operations and Air Crew to the Maldives.

5. Implementation – Lessons Learnt

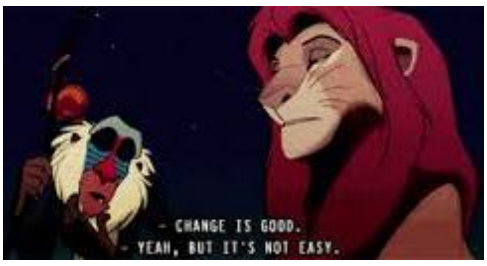
Critical Element 3

5.1 Looking back, ICAO Critical Element 3 (or a CAA) should be *the* number one critical element for any SARI State. Regulation change, among other things, without the "appropriate and adequate technical staff provided with adequate resources" was, at times, like drawing lines in the sand.



Decide on a raison d'etre and vision

5.2 The regulation change project has been and continues to be a long and difficult process. Having a well-accepted raison d'etre and a vision of the future was and continues to be instrumental to the regulation change project. It 'forces' us stick to the "flight plan" devised in 2005 (despite detours).



Communicate and build strong CAA-Industry relationships

5.3 Implementation was better when regulatory changes were regularly communicated to the Industry. The CAA held various meetings and training sessions such pre-NPA Accountable Managers' briefing and pre-implementation training sessions to each major operator. We also have joint training sessions with Industry and they are almost always invited to participate in CAA internal training sessions.

Give ample time and stick to it

5.4 The CAA has consistently given industry ample implementation time for any major regulation. This has allowed us (and the industry) to accept significant changes in a relaxed manner.

Consistently participate in SARI WGs

5.5 Designate a core implementation team and have them *consistently* participate in the SARI WGs. These WGs continue to be an important resource for Inspectors where they can get assistance from EASA, SARI CAAs and industry partners who are actual practioners of the SARI Parts.

Be prepared to make mistakes

5.6 Mistakes will happen and this should not be a barrier as the fatal mistake would be not to change.