



Safety Management System Gap Analysis and Project Plan Red Deer Regional Airport

Submitted to:
**Red Deer Regional Airport
Authority**

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March 2009

Safety Management System Gap Analysis and Project Plan – Red Deer Regional Airport

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Appendix A Detailed Gap Analysis and Project Plan

I. INTRODUCTION

Background

In Flight 2005, “A Civil Aviation Safety Framework for Canada”, Transport Canada (TC) committed to the implementation of Safety Management System (SMS) in civil aviation organizations. Safety management is a principal element of a sound aviation management program, and a prime factor in the achievement of the goals set out in Flight 2005 - the reduction of aviation accidents and incidents, and an increased level of public confidence in Canada’s air transportation system. The aim is to improve aviation safety through proactive management rather than reactive compliance with regulatory requirements.

After extensive consultations through the Canadian Aviation Regulation Advisory Council (CARAC), TC has now established new regulations as part of the Canadian Aviation Regulations (CARs) that require Canadian airports to develop and implement SMS as part of their Airport Operators Manual (AOM).

The Red Deer Regional Airport Authority Inc. has retained the services of Jacobs Consultancy (JC) for the development and implementation of an SMS that conforms to Canadian Aviation Regulations and Standards.

Objectives

The specific objectives of Phase I of the SMS Development were to:

1. Conduct a gap analysis of the Airport’s existing systems in comparison with the CARs SMS requirements; and
2. Develop a project plan that clearly demonstrates how the Airport will implement their SMS, based on the requirements of the exemption and the results of the gap analysis. The project plan is subject to acceptance by Transport Canada.

This report provides the Gap Analysis and Project Plan.

Methodology

Jacobs Consultancy prepared the Gap Analysis based on:

- A review of relevant Airport documentation including:
 - The Airport Operations Manual (AOM);
 - The Winter Operations Plan;
 - Emergency Response Plan;
 - Wildlife Management Plan;
 - Job Descriptions; and
 - Airside Vehicle Operations Permit.
- Selected interviews with the Airport’s CEO;
- TC requirements for the Gap Analysis and Project Plan as detailed in Advisory Circular 300-002, December 19, 2009, “Safety Management System Implementation Procedures for Airport Operators”;
- Part I, Subpart 7 of the CARs—*Safety Management System Requirements*, and Part III, Subpart 2 of the CARs—*Airports*.

Structure of the Gap Analysis and Project Plan

The Gap Analysis and the Project Plan are structured to address the six major components of an SMS as outlined in TC Advisory Circular 300-002. These components are as follows:

1. Safety Management Plan
2. Document Management
3. Safety Oversight
4. Training
5. Quality Assurance
6. Emergency Preparedness

Appendix A details the Gap Analysis and the Project Plan using Transport Canada's Gap Analysis and Project Plan form as required in the TC Advisory Circular 300-002. The updated form distributed by TC to airports in January 2009 was used.

II. SAFETY MANAGEMENT PLAN

Requirements

According to CARs 107 and 302, and the TC Advisory Circular 300-200, the Safety Management Plan component must include the following elements:

1. A safety policy;
2. A non-punitive reporting policy;
3. Roles and responsibilities of airport personnel for safety;
4. Communications related to SMS;
5. Safety planning, objectives and goals;
6. Performance measurement;
7. Management review.

Gap Analysis

There is a safety policy in place that could be enhanced for SMS. Existing job descriptions describe duties that have a direct impact on safety. These job descriptions can be summarized in the SMS manual. New responsibilities for SMS can be added to the SMS manual.

Since SMS is a new requirement, other elements are not in place or have not been adequately documented for SMS.

III. SMS DOCUMENT MANAGEMENT

Requirements

According to the TC Advisory Circular 300-002, the following elements are required under this component:

1. Identification and maintenance of applicable regulations;
2. SMS documentation; and
3. Records management.

Gap Analysis

As for the Safety Management Plan, the required elements are not yet in place or not adequately documented. For example, the Airport monitors and reviews upcoming regulations and implements new regulations as required but this process is not documented. Similarly, the Airport maintains records necessary to meet regulatory requirements but has not documented the processes for doing so.

IV. SAFETY OVERSIGHT

Requirements

The requirements for the Safety Oversight Component include:

1. Reactive processes;
2. Proactive processes;
3. Investigation and analysis; and
4. Risk Management.

Gap Analysis

Based on our review of various TC guidance documents, our understanding is that reactive processes deal with aviation hazards, incidents or accidents that have already occurred at or near the Airport. The processes could include accident investigation, reporting of occurrences and hazards, reporting of AVOP violations, airport inspections and specific meetings dealing with safety. Our understanding is that proactive processes refer to Safety Risk Management and Trend Analysis, although there is some overlap between the reactive and proactive processes as defined above.

The Airport has a number of reactive processes in place including:

- Aircraft Occurrence reporting;
- Inspections of airfield hazards;
- Reporting of Runway Surface Conditions during winter operations;
- Requests for maintenance when hazards or deficiencies are found; and
- Wildlife monitoring, control and reporting.

The SMS will refer to these existing processes and update them where appropriate as detailed in Appendix A.

The Airport does not have proactive or risk management processes such as formal safety risk management and trend analysis in place. This is a new requirement for the Airport under SMS. These processes will be developed in Phase 2 of the SMS development.

V. TRAINING

Requirements

The Training Component has a number of requirements including:

1. Identification of training requirements for personnel within the SMS;
2. Human and organizational factors;
3. A process to measure the effectiveness of training;
4. Initial indoctrination, recurrent and update SMS training; and
5. Emergency preparedness and response training.

Gap Analysis

Because SMS overall is a new regulatory requirement, SMS related training (1-4 above) needs to be developed.

Training for emergency preparedness and response is provided through table top and full scale exercises in accordance with CARs regulatory requirements.

VI. QUALITY ASSURANCE

Requirements

Quality Assurance refers to internal and/or external audits of procedures, analyses, inspections and training related to airport functions.

Gap Analysis

The Airport does not have a Quality Assurance program.

VII. EMERGENCY PREPAREDNESS

Requirements

Advisory Circular 300-002 includes the requirement to have and to periodically review emergency preparedness or emergency response plans, and to conduct drills and exercises.

Gap Analysis

The Airport has an Emergency Response Plan as part of the Airport Operations Manual approved by Transport Canada. The Airport conducts drills and exercises in accordance with regulatory requirements. It does not appear that there are any gaps that need to be included in the development of SMS.

VIII. PROJECT PLAN

The Airport proposes to develop the SMS according to the milestones listed below. The project plan allows time for development of the SMS manual, training, reviews by Transport Canada and then sufficient time to implement the various phases of the SMS within the deadlines set by Transport Canada.

MILESTONE	End Date
1. Develop draft of Phase 2 components and elements for internal review by the Airport.	March 2010
2. Address Phase 1 comments from Transport Canada and incorporate into Phase 2 plan and documentation.	July 2009
3. Finalize Phase 2 documentation and submit to Transport Canada.	August 2009
4. Conduct Phase 2 SMS Training for the manager responsible for SMS and selected supervisors/managers.	October 2009
5. Address Phase 2 comments from Transport Canada and incorporate into other elements of plan and documentation.	March 2012
6. Commence implementation of Phase 2 elements of the SMS plan.	March 2012
7. Complete implementation of Phase 2 Elements of SMS.	March 2010 (TC deadline)
8. Develop draft of Phase 3 components and elements for internal review by the Airport.	May 2010
9. Finalize Phase 3 documentation and submit to Transport Canada.	June 2010
10. Address Phase 3 comments from Transport Canada and incorporate into other elements of plan and documentation.	September 2010
11. Conduct Phase 3 Training for the manager responsible for SMS and selected supervisors/managers.	October 2010
12. Commence implementation of Phase 3 elements of the	November 2010

SMS plan.

- | | | |
|-----|---|---------------------------|
| 13. | Complete implementation of Phase 3 Elements of SMS. | March 2011 (TC deadline) |
| 14. | Develop draft of Phase 4 components and elements for internal review by the Airport. | May 2011 |
| 15. | Finalize Phase 4 documentation and submit to Transport Canada. | June 2011 |
| 16. | Address Phase 4 comments from Transport Canada and incorporate into other elements of plan and documentation. | September 2011 |
| 17. | Conduct Phase 4 Training for the manager responsible for SMS and selected supervisors/managers. | October 2011 |
| 18. | Commence implementation of Phase 4 elements of the SMS plan. | November 2011 |
| 19. | Complete implementation of Phase 4 Elements of SMS. | March 2012 (TC deadline) |
| 20. | Revise Airport's SMS documentation based on final feedback from Transport Canada | When feedback is received |

Appendix A

Detailed Gap Analysis and Project Plan

			TC USE	
Organization name: Red Deer Regional Airport Authority			File No.:	RDIMS No.:
Person Responsible for Implementing SMS: Liam O’Connell			Title: Airport CEO	

GAP ANALYSIS				PROJECT PLAN			
	Safety Management System requirements	Response (yes/no)	If yes, state where the requirement is addressed, with a specific manual reference. If no, record in project plan for further development.	Description of required changes	Project manager	Due date	Project status update (recommended)
A	Is an SMS with defined components established, maintained and adhered to? CAR 107.02, 302.501(a)	No		Develop SMS components.	L. O’Connell with assistance of Jacobs Consultancy (JC)	Full SMS Implementation by March 2012. See Gap Analysis Report for more detailed schedule for developing documentation, training and implementation.	
B	Is the SMS appropriate to the size and complexity of the organization? CAR 107.04	No, SMS is not developed.			As above	As above	
Component 1: Safety Management Plan—Element 1.1: Safety Policy							
A	Is there a safety policy in place, and is it followed and understood? CAR 107.03, 302.502(a)(i)	Yes to some extent	The Airport Policy Manual states that “The Authority wishes to ensure its facilities are safe and secure. Therefore, Employees are encouraged at all times to exercise prudent judgment and common sense in the discharge of all their responsibilities with the Authority, and to conduct themselves and act within the tenor and spirit of the Authority and its policies”.	Enhance current safety policy to more specifically address aviation safety for inclusion in the SMS and communicate to employees.	L. O’Connell with assistance of JC	Phase 2. Implementation by March 2010. See Gap Analysis Report for detailed schedule.	
B	Has the organization based its safety management system on the safety policy and does it provide for a clear	No, SMS is not developed.		Define commitment in Element 1.1 Develop SMS Components.	L. O’Connell with assistance of JC	Phase 2. By March 2010	

	commitment to safety? CAR 107.03, 302.502(a)(i)						
C	Is the safety policy agreed to and approved by the accountable executive? CAR 302.502(a)(i)	Yes to some extent: the current safety policy is part of the airport's official Policy Manual		Obtain approval for enhanced safety policy during Component 1, Element 1.1 development.	L. O'Connell with assistance of JC	Phase 2. By March 2010	
D	Is the safety policy promoted by the accountable executive? CAR 302.502(a)(i)	No, not for aviation safety		Promote safety policy as part of Element 1.4 (Communication) and Element 4.1 (Training)	L. O'Connell with assistance of JC	Phase 2. By March 2010	
E	Is the safety policy reviewed periodically for continuing applicability? CAR 107.03(g), 302.502(a)(v)	No		Define procedure in Component 1, Element 1.7 (Management Review)	L. O'Connell with assistance of JC	Phase 2. By March 2010	
F	Is the safety policy communicated to all employees with the result that they are made aware of their safety obligations? CAR 107.03(f), 302.502(a)(i), (ii)	No		Communicate safety policy as part of Element 1.4 (Communication) and Element 4.1 (Training)	L. O'Connell with assistance of JC	Phase 2. By March 2010	
G	Is the policy implemented at all levels of the organization? CAR 302.502(a), 302.502 (h)	No		Implement Safety Policy through Element 1.4 (Communication) and Element 4.1 (Training)	L. O'Connell with assistance of JC	Phase 2. By March 2010	
Component 1: Safety Management Plan—Element 1.2: Non-Punitive Reporting Policy							
A	Is there a policy in place that provides immunity from disciplinary action for employees that report hazards, incidents or accidents? CAR 302.502(a)(iv)	No		Non-Punitive Reporting Policy will be developed as part of Component 1, Element 1.2.	L. O'Connell with assistance of JC	Phase 2. By March 2010	

B	Are conditions under which punitive disciplinary action would be considered (e.g. illegal activity, negligence or willful misconduct) clearly defined and documented? CAR 302.502(a)(iv)	No		The SMS will include conditions when disciplinary action would be considered as part of Component 1, Element 1.1	L. O'Connell with assistance of JC	Phase 2. By March 2010	
C	Is the non-punitive reporting policy widely understood within the organization? CAR 302.502(a)	No		Develop means to enhance understanding of the Non-Reporting Policy as part of Element 1.4 (Communication) and Element 4.1 (Training)	L. O'Connell with assistance of JC	Phase 2. By March 2010	
D	Is there evidence that the organization is applying the non-punitive reporting policy? CAR 302.502(a)(iv)	No		Develop further as part of Element 1.7 (Management Review)	L. O'Connell with assistance of JC	Phase 2. By March 2010	
Component 1: Safety Management Plan—Element 1.3: Roles, Responsibilities and Employee Involvement							
A	Are there documented roles and responsibilities and accountabilities for the accountable executive? CAR 106.02(1)(a), 106.03, 302.501(b)	Yes	The CEO's detailed job description	Roles and responsibilities will be summarized at part of Element 1.3.	L. O'Connell with assistance of JC	Phase 2. By March 2010	
B	Does the accountable executive demonstrate control of the financial and human resources required for the proper execution of his/her SMS responsibilities? CAR 106.02(2), 302.501(b)	Yes	The CEO's responsibility as the accountable executive in the CEO's job description demonstrates full control of financial and human resources at the airport, and responsibilities for safe operations at the airport.	Element 1.3 will summarize this requirement.	L. O'Connell with assistance of JC	Phase 2. By March 2010	
C	Has a qualified person been appointed, in accordance with the regulation, and have they demonstrated control of the SMS? 302.504(b), (c)	Yes	The Airport CEO will be responsible for managing the SMS.	Document the roles and responsibilities of the CEO for SMS as part of Element 1.3	L. O'Connell with assistance of JC	Phase 2. By March 2010	
D	Does the person managing the operation of the SMS fulfill the required job functions and responsibilities? CAR 302.504(b), (c)	No, SMS job functions have not been defined		Define roles and responsibilities of the CEO for SMS as part of Element 1.3	L. O'Connell with assistance of JC	Phase 2. By March 2010	

E	Are the safety authorities, responsibilities and accountabilities of personnel at all levels of the organization transmitted to all personnel? CAR 107.03(f), 302.502(a)(ii)	Yes, to a large extent	Existing job descriptions describe responsibilities that have a direct impact on aviation safety.	Safety roles and responsibilities of airport personnel will be included as part of Element 1.3	L. O'Connell with assistance of JC	Phase 2. By March 2010	
F	Do all personnel understand their authorities, responsibilities and accountabilities with regard to all safety management processes, decisions and actions? CAR 107.03(f), 302.502 (a)(ii)	No, not for SMS		Promote understanding of roles and responsibilities through Element 1.4 (Communication) and Element 4.1 (Training)	L. O'Connell with assistance of JC	Phase 2. By March 2010	
Component 1: Safety Management Plan—Element 1.4: Communication							
A	Are there communication processes in place within the organization that allow the SMS to function effectively? CAR 302.502 (b), (d), (g)	No, not specifically for SMS		Develop Communication procedures/mechanisms including monthly staff meetings as part of Element 1.4	L. O'Connell with assistance of JC	Phase 2. By March 2010	
B	Are communication processes (written, meetings, electronic, etc.) commensurate with the size and complexity of the organization? CAR 107.04	Yes	There are only 3 positions reporting to the CEO and as such most communication is direct and face-to-face. There are monthly staff meeting that address safety issues as warranted. Weekly tool box meetings to address safety are planned	Develop Communication procedures as part of Element 1.4	L. O'Connell with assistance of JC	Phase 2. By March 2010	
C	Is information established and maintained in a suitable medium? CAR 107.03(f), 302.08(4)(f)	No	Existing reports regarding hazards, incidents and accidents are stored in hard copy	Develop Communication procedures as part of Element 1.4	L. O'Connell with assistance of JC	Phase 2. By March 2010	
D	Is there a process for the dissemination of safety information throughout the organization and a means of monitoring the effectiveness of this process? CAR 107.03(f), 302.505(1)(a), (d), (f)	No, not specific to SMS	Informal direct communications only	Develop Communication procedures as part of Element 1.4	L. O'Connell with assistance of JC	Phase 2. By March 2010	
Component 1: Safety Management Plan—Element 1.5: Safety Planning, Objectives and Goals							
A	Have safety objectives been established using a safety risk profile that considers hazards and risks? CAR 107.03(b), 302.502(a)(iii)	No		Develop airside safety objectives and goals as part of Component 1, Element 1.5	L. O'Connell with assistance of JC	Phase 2. By March 2010	

B	Are objectives and goals consistent with the safety policy and is their attainment measurable? CAR 107.03(b), 302.502(a)(iii), (e)	No		Develop airside safety objectives and goals as part of Component 1, Element 1.5	L. O'Connell with assistance of JC	Phase 2. By March 2010	
C	Does the process include periodic review and update of the safety objectives and goals? CAR 107.03(b), (h), 302.502(a)(iii)	No		Develop airside safety objectives and goals as part of Component 1, Element 1.5	L. O'Connell with assistance of JC	Phase 2. By March 2010	
D	Is there a documented process to develop a set of safety goals to achieve overall safety objectives? CAR 107.03(b), 302.502(a)(iii)	No		Develop airside safety objectives and goals as part of Component 1, Element 1.5	L. O'Connell with assistance of JC	Phase 2. By March 2010	
E	Are safety objectives and goals documented and publicized? CAR 107.03(b),(f), 302.502(a)(i), (iii)	No		Develop airside safety objectives and goals as part of Component 1, Element 1.5	L. O'Connell with assistance of JC	Phase 2. By March 2010	
Component 1: Safety Management Plan—Element 1.6: Performance Measurement							
A	Is there a documented process to develop and maintain a set of performance parameters that are linked to the organization's goals and objectives? CAR 107.03(b), 302.502(a)(iii)	No		Develop Performance Measurement procedures and processes as part of Component 1, Element 1.6	L. O'Connell with assistance of JC	Phase 2. By March 2010	
B	Have procedures for the monitoring and measuring of safety performance on a regular basis been developed? CAR 107.03(b), (g), (h), 302.502(a)(iii)	No	Occupational Health and Safety indicators are tracked (e.g., first aid and any required medical follow-ups.	Develop Performance Measurement procedures and processes as part of Component 1, Element 1.6	L. O'Connell with assistance of JC	Phase 2. By March 2010	
Component 1: Safety Management Plan—Element 1.7: Management Review							
A	Are regular and periodic, planned reviews and reviews for cause of the company's Safety Management System conducted to ensure its continuing adequacy and effectiveness, (this would include review of company safety performance and achievement)? CAR 107.03(g), 302.502(a)(v)	No		Develop Management Review processes as part of Component 1 with reference to review of other components 2 - 6	L. O'Connell with assistance of JC	Phase 2. By March 2010	
B	Does the safety management system review include: • internal audit results,	No		Develop Management Review processes as part of Component 1 with reference to	L. O'Connell with assistance of JC	Phase 2. By March 2010	

	<ul style="list-style-type: none"> activities to verify that employees understand the SMS and their role and responsibilities in it, safety objective achievement results hazard and occurrence investigation and analysis results internal/external feedback and results, status of corrective and preventative actions, follow-up actions from previous management reviews changes that could affect the SMS, recommendations for improvement, sharing of best practices across the organization? <p>CAR 107.03(d), (f), (g), (h), 302.502(a)(v)</p>			review of other components 2 - 6			
C	<p>Is there is a documented procedure defining responsibilities and requirements for planning and conducting internal audits of:</p> <ul style="list-style-type: none"> management policies, controls and procedures concerning all safety critical activities; and the implementation and maintenance of SMS requirements established by the organization? <p>CAR 107.03(h), 302.503</p>	No		Develop Management Review processes as part of Component 1 with reference to review of other components 2 - 6	L. O'Connell with assistance of JC	Phase 2. By March 2010	
D	<p>Is there a process to evaluate the effectiveness of corrective actions resulting from periodic planned reviews and reviews for cause?</p> <p>CAR 302.505(1)(e), 302.503(3)(f)</p>	No		Develop Management Review processes as part of Component 1 with reference to review of other components 2 - 6	L. O'Connell with assistance of JC	Phase 2. By March 2010	
Component 2: Document Management—Element 2.1: Identification and Maintenance of Applicable Regulations							
A	Has a documented procedure been established and maintained for identifying applicable regulatory requirements?	No	Procedures are not documented.	Document processes as part of Component 2, Element 2.1	L. O'Connell with assistance of JC	Phase 2. By March 2010	

B	Are regulations, standards and exemptions periodically reviewed to ensure that the most current information is available?	Regulations are reviewed but the process is not documented		Document processes as part of Component 2, Element 2.1	L. O'Connell with assistance of JC	Phase 2. By March 2010	
Component 2 : Document Management—Element 2.2 : SMS Documentation							
A	Is there controlled documentation that describes the SMS and the interrelationship between all of its elements? CAR 107.03(f), 302.08(4)(f)	No		SMS to be described in Phases 2, 3, 4	L. O'Connell with assistance of JC	Phase 2 elements by March 2010. Documentation for other elements in other phases outlined below.	
B	Is documentation readily accessible to all personnel? CAR 107.03(f)	No		Develop process in Phase 2	L. O'Connell with assistance of JC	Phase 2 elements by March 2010. Documentation for other elements in other phases outlined below.	
C	Is there a process to periodically review SMS documentation to ensure its continuing suitability, adequacy and effectiveness, and that changes to company documentation have been implemented? CAR 107.03(h), 302.502(a)(v)	No		Develop process in Phase 2 as part of Performance Review, Component 1, Element 1.7.	L. O'Connell with assistance of JC	Phase 2. By March 2010.	
D	Is there acceptable means of documentation that includes (but is not limited to) organizational charts, job descriptions and other descriptive written material that defines and clearly delineates the system of authority and responsibility within the organization for ensuring safe operation? CAR 107.03(f), 302.502(a)(ii), 302.502(h)	Yes	There is an updated organization chart which is part of the AOM. Existing job descriptions describe responsibilities that have a direct impact on aviation safety. In addition, the AOM also describes responsibilities for daily airside inspections, lighting inspections and airport condition reporting during winter operations.	Include organization chart. Include safety responsibilities for the CEO, Supervisor of Airport Operations, the Airport Operations Specialist, the Maintenance Specialist and airport tenants. Define additional SMS responsibilities.	L. O'Connell with assistance of JC	Phase 2. By March 2010.	

E	Is there a process to identify changes within the organization that could affect company documentation? CAR 107.03(h), 302.502(a)(v)	No		Develop processes to update SMS documentation	L. O'Connell with assistance of JC	Phase 2. By March 2010.	
Component 2: Document Management—Element 2.3: Records Management							
A	Does the certificate holder have a records system that ensures the generation and retention of all records necessary to document and support the SMS? CAR 302.502(c), 302.505(1)(d)	No, not for SMS	The CEO's job description describes responsibility to provide secure electronic back up of files and a hard copy document file system.	Define records management for SMS related documents	L. O'Connell with assistance of JC	Phase 2. By March 2010.	
B	Does the system provide the control processes necessary to ensure appropriate identification, legibility, storage, protection, archiving, retrieval, retention time, and disposition of records? CAR 302.502(c), 302.505(1)(d)	No, not for SMS	Hard copy records are stored in filing cabinets and backed up electronically.	Define records management for SMS related documents	L. O'Connell with assistance of JC	Phase 2. By March 2010.	
Component 3: Safety Oversight—Element 3.1: Reactive Processes							
A	Does the certificate holder have a process or system that provides for the capture of information including hazards, incidents, accidents and other data relevant to SMS? CAR 107.03(e), 302.502(a)(iv),(c)	Yes	The airport has several processes/systems including: 1. Preparation of an Aviation Occurrence Report for submission to the TSB in case of an aircraft accident or incident. 2. Daily runway, taxiways and apron inspections of surface conditions, lights, signage and markings, FOD, etc. An inspection checklist is filled in. Self-inspection processes are detailed in the AOM. 3. Wildlife inspections are conducted daily during inspections, and as required. A Bird/Wildlife Strike Report is prepared when there is a strike. 4. During winter operations, runway surface condition reports are provided to FSS.	1. Include Aviation Occurrence Reporting as part of Element 3.1. 2. Refer to information from inspection program as part of Element 3.1. 3. Refer to information from wildlife inspections as part of Element 3.1 4. Refer to winter maintenance programs as part of Element 3.1. 5. Refer to maintenance reports as a source of potential aviation hazards as part of Element 3.1.	L. O'Connell with assistance of JC	Phase 2. By March 2010	

			5. Maintenance requests are generated if deficiencies are noted in any airport facilities or equipment and when they are rectified.				
B	Is the reactive reporting process simple, accessible and commensurate with the size and complexity of the organization? CAR 107.04	Not applicable	This requirement is a qualitative assessment which cannot be made until the SMS is developed.		Not Applicable (NA)	Not Applicable (NA)	
C	Are reactive reports reviewed at the appropriate level of management? CAR 302.502(b)	Yes	Currently by the CEO but the process is not documented. In the future the Supervisor of Airport Operations will be responsible.	Document review by Supervisor of Airport Operations as part of Element 3.1		Phase 2. By March 2010.	
D	Is there a feedback process to notify contributors that their reports have been received and to share the end results of the analysis? CAR 302.505(1)(a)	No		Develop feedback process for new Non-Punitive Reporting System as part of Component 1, Element 1.2. Develop feedback process on Safety Risk Management as part of Element 3.2 in Phase 3.	L. O’Connell with assistance of JC	Phase 2. By March 2010.	
E	Is there a process in place to monitor and analyze trends? CAR 302.505(1)(d)	No		Develop trend analysis procedures and responsibilities as part of Element 3.1.	L. O’Connell with assistance of JC	Phase 2. By March 2010.	
F	Are corrective actions generated and implemented to respond to event analysis? CAR 107.03(e), 302.502(e), 302.505(1)(e)	Yes, to some degree.	Corrective action is taken through maintenance requests when deficiencies are noted during inspections.	Further develop and document process for taking corrective action in response to safety risk management (Phase 3).	L. O’Connell with assistance of JC	Phase 2. By March 2010.	
Component 3: Safety Oversight—Element 3.2: Proactive Processes							
A	Does the certificate holder have a proactive process or system that provides for the capture of information identified as hazards and other data relevant to SMS and has a hazard register been developed? CAR 107.03(e), 302.502(a)(iv), 302.502(b), (c), 302.505(1)	No, there is no safety risk management process in place	Processes described under 3.1A are considered re-active processes.	Proactive reporting will be developed as part of Safety Risk Management in Element 3.2	L. O’Connell with assistance of JC	Phase 3. By March 2011	

B	Is the proactive reporting process simple, accessible and commensurate with the size and complexity of the organization? CAR 107.04	Not applicable	This statement is a qualitative assessment of proactive processes which we understand refers to Safety Risk Management which is not in place.	Develop as part of Safety Risk Management in Element 3.2			
C	Are proactive reports reviewed at the appropriate level of management? CAR 302.502(b)	No		Develop as part of Safety Risk Management in Element 3.2	L. O'Connell with assistance of JC	Phase 3. By March 2011.	
D	Is there a feedback process to notify contributors that their proactive reports have been received and to share the end results of the analysis? CAR 302.505(1)(a)	No	Current feedback process with only 4 positions is direct verbal communication.	Develop as part of Safety Risk Management in Element 3.2	L. O'Connell with assistance of JC	Phase 3. By March 2011.	
E	Is there a process in place to monitor and analyze trends? CAR 107.03(c), 302.505(1)(c), (d)	No		Develop as part of trend analysis process in Element 3.1 above.	L. O'Connell with assistance of JC	Phase 3. By March 2011.	
F	Are corrective actions generated and implemented in response to hazard analysis? CAR 107.03(c), 302.505(1)(e)	No, there is no safety risk management process in place		Develop as part of Safety Risk Management in Element 3.2	L. O'Connell with assistance of JC	Phase 3. By March 2011.	
G	Has the organization planned self-evaluation processes, such as regularly scheduled reviews, evaluations, surveys, operational audits, assessments, etc.? CAR 107.03(g), 302.505(1)(b))	No		Develop procedures as part of Management Review (Element 1.7) and Quality Assurance (Component 5 in Phase 4).	L. O'Connell with assistance of JC	Phase 2 by March 2011 for Management Review and Phase 4 by March 2012 for Quality Assurance	
H	Does the organization conduct hazard analysis and build a safety case for changes that June impact their operations (e.g. for the introduction of new aircraft type, a change in route structures, a change in key personnel, for mergers, for management/bargaining agent agreements, etc)? CAR 107.03(c), 302.502(b), (c,) (d), (e), 302.505(1)(b), (c)	No		Develop as part of Safety Risk Management in Element 3.2	L. O'Connell with assistance of JC	Phase 3. By March 2011.	

I	Has the organization identified a defined interval between hazard analyses? CAR 302.502(b), (c)	No		Develop as part of Safety Risk Management in Element 3.2	L. O'Connell with assistance of JC	Phase 3. By March 2011.	
J	Has the organization developed a safety risk profile to prioritize the hazards listed on the hazard register? CAR 302.502(b), (c)	No		Need to clarify what is required and then include as part of Safety Risk Management in Element 3.2	L. O'Connell with assistance of JC	Phase 3. By March 2011	
Component 3: Safety Oversight—Element 3.3: Investigation and Analysis							
A	Are there procedures in place for the conduct of investigations? CAR 107.03(c), 302.505(1)(c)	Does not appear applicable	Aviation accidents and occurrences are investigated by the TSB.				
B	Do measures exist to ensure that hazards, incidents and accidents are reviewed and where required, investigated? CAR 107.03(c), 302.505(1)(c)	No	Investigation of aviation accidents and occurrences are the responsibility of the TSB. Investigation procedures of other incidents and hazards are not documented.	Document investigation of hazards and incidents identified in Non-Punitive Reporting in Element 1.2 in Phase 2. Document hazard analysis process as part of Safety Risk Management as part of Element 3.2 in Phase 3.	L. O'Connell with assistance of JC	Phase 2 by March 2010. Phase 3 by March 2011.	
C	Is there a process to ensure that hazards, incidents and accidents are analyzed to identify contributing and root causes? CAR 107.03(c), 302.505(1)(c)	No		Document incident investigation, review and analysis process as part of Element 3.1 in Phase 2. Document analysis of hazards and incidents identified in Non-Punitive Reporting in Element 1.2 in Phase 2. Document hazard analysis process as part of Safety Risk Management as part of Element 3.2 in Phase 3.	L. O'Connell with assistance of JC	Phase 2 by March 2010. Phase 3 by March 2011.	
D	Does the organization consider individual human factors, the environment, supervision and organizational elements when identifying contributing and root causes? CAR 302.505(1)(c)	No		Document incident investigation, review and analysis process as part of Element 3.1 in Phase 2. Document analysis of hazards and incidents identified in Non-	L. O'Connell with assistance of JC	Phase 2 by March 2010. Phase 3 by March 2011.	

				Punitive Reporting in Element 1.2 in Phase 2. Document hazard analysis process as part of Safety Risk Management as part of Element 3.2 in Phase 3.			
E	Does the organization have a staff of competent investigators commensurate with its size and complexity? CAR 107.03(d), 107.04, 302.502(f),	Yes	Airport CEO with extensive airport operations experience.	Document as part of Safety Risk Management (Element 3.2 in Phase 3).	L. O’Connell with assistance of JC	Phase 2 by March 2010. Phase 3 by March 2011.	
F	Does the process ensure that results of the analysis are communicated to the responsible manager for corrective action and to other relevant managers for their information? CAR 302.502(b), 302.505(1)(e)	No, process not documented		Include requirement in: <ul style="list-style-type: none"> • Incident Investigation, Element 3.1 • Non-Punitive Reporting, Element 1.2 • Safety Risk Management, Element 3.2 	L. O’Connell with assistance of JC	Phase 2 by March 2010. Phase 3 by March 2011.	
G	Is there a process to capture information from an investigation so it that can be used to monitor and analyze trends? 302.505(1)(d)	No		This requirement will be included in Element 3.1 as part of trend analysis.	L. O’Connell with assistance of JC	Phase 2 by March 2010.	
H	Is there evidence that the organization has made every effort to complete the investigation and analysis process in the established timeframe? CAR 302.505(1)(c)	Not applicable.	This requirement is an assessment of a process which needs to be developed.	Establishing time lines and follow-up will be built into: <ul style="list-style-type: none"> • Incident Investigation, Element 3.1 • Non-Punitive Reporting, Element 1.2 • Safety Risk Management, Element 3.2 	L. O’Connell with assistance of JC	Phase 2 by March 2010. Phase 3 by March 2011.	
Component 3: Safety Oversight—Element 3.4: Risk Management							
A	Is there a structured process for the management of risk that includes the assessment of risk associated with identified hazards, expressed in terms of severity and probability of occurrence and where applicable the level of exposure? CAR 107.03(c), 302.505(1)(b)	No	.	Develop and document as part of Safety Risk Management (Element 3.2 in Phase 3)	L. O’Connell with assistance of JC	Phase 3 by March 2011.	

B	Are there criteria for evaluating the level of risk and the tolerable level of risk the organization is willing to accept? CAR 107.03(c), 302.505(1)(b)	No		Develop and document as part of Safety Risk Management (Element 3.2 in Phase 3)	L. O'Connell with assistance of JC	Phase 3 by March 2011.	
C	Does the organization have risk control strategies that include risk control, risk acceptance, risk mitigation, risk elimination and where applicable a corrective action plan? CAR 107.03(c) 302.505(2)(a)	No		Develop and document as part of Safety Risk Management (Element 3.2 in Phase 3)	L. O'Connell with assistance of JC	Phase 3 by March 2011.	
D	Are corrective actions, to include timelines, resulting from the risk assessment documented? CAR 302.505(2)	No		Develop and document as part of Safety Risk Management (Element 3.2 in Phase 3)	L. O'Connell with assistance of JC	Phase 3 by March 2011.	
E	Does the organization have a process for evaluating the effectiveness of the corrective actions? CAR 107.03(e), (h), 302.505(1)(e), 302.505(2)	No		Develop and document as part of Safety Risk Management (Element 3.2 in Phase 3)	L. O'Connell with assistance of JC	Phase 3 by March 2011.	
Component 4: Training—Element 4.1: Training, Awareness and Competence							
A	Is there a documented process to identify training requirements so that personnel are competent to perform their duties within the SMS? CAR 107.03(d), 302.502(f)	No, not for SMS	Requirements for SMS training have not been identified.	SMS training requirements will be documented as part of Phase 2. Training will be delivered after Phase 2 and 3 are documented and after Phase 4 is documented.	L. O'Connell with assistance of JC	Phase 2 by March 2010. See detailed schedule in Gap Analysis Report for training	
B	Is there a validation process that measures the effectiveness of the SMS training? CAR 107.03(d), 302.505(1)(g)	No		A validation process will be developed as part of Phase 2.	L. O'Connell with assistance of JC	Phase 2 by March 2010.	
C	Does the SMS training include initial, recurrent and update training, as applicable? CAR 107.03(d), 302.502(f)	No		Training requirements will be documented as part of Phase 2.	L. O'Connell with assistance of JC	Phase 2 by March 2010.	

D	Is the organization's SMS incorporated into indoctrination training upon employment? 302.502(f)	No		Training requirements will be documented as part of Phase 2.	L. O'Connell with assistance of JC	Phase 2 by March 2010.	
E	Does the SMS training include human and organizational factors? CAR 107.03(d), 302.07(1)(g)	No		Training requirements will be documented as part of Phase 2. Training will be delivered after Phase 2 and 3 are documented and after Phase 4 is documented.	L. O'Connell with assistance of JC	Phase 2 by March 2010. See detailed schedule in Gap Analysis Report for training	
F	Does the training program include emergency preparedness and response training for affected personnel? CAR 302.207(1)(a), (b), 302.207(2)	Yes	The airport conducts table top exercises and full drills in accordance with CAR regulations.				
Component 5: Quality Assurance—Element 5.1: Operational Quality Assurance							
A	Is a quality assurance system established and maintained and under the management of an appropriate person? CAR 107.02, 302.503(1), 302.503(2)	No		Develop and document quality assurance system as Component 5 in Phase 4.	L. O'Connell with assistance of JC	Phase 4 by March 2012.	
B	Is there an operationally independent audit function with the authority required to carry out an effective internal evaluation program? CAR 107.03, 302.503(5)	No		Develop and document as part of the quality assurance system in Component 5 in Phase 4.	L. O'Connell with assistance of JC	Phase 4 by March 2012	
C	Does the organization conduct reviews and audits of its processes, its procedures, analyses, inspections and training? CAR 107.03, 302.503(3)	No		Management reviews will be addressed in Elements 1. 6 and 1.7. and referred to in the quality assurance system. Audits will be added to the quality assurance system.	L. O'Connell with assistance of JC	Phase 4 by March 2012.	

D	Does the organization have a system to monitor for completeness of the internal reporting process and the completion of corrective action? CAR 107.03, 302.503(3)(g)	No		Include requirement in: <ul style="list-style-type: none"> • Incident Investigation, Element 3.1 • Non-Punitive Reporting, Element 1.2 • Safety Risk Management, Element 3.2 • Audits, Element 5.1 	L. O'Connell with assistance of JC	Phase 2 by March 2010. Phase 3 by March 2011. Phase 4 by March 2012	
E	Does the quality assurance system cover all functions defined within the certificate(s)? CAR 107.03, 302.503(3)(c)	No		Develop and document as part of the quality assurance system in Component 5 in Phase 4.	L. O'Connell with assistance of JC	Phase 4 by March 2012.	
F	Are the audit scope, criteria, frequency and methods defined? CAR 107.03, 302.503(3)	No		Develop and document as part of the quality assurance system in Component 5 in Phase 4.	L. O'Connell with assistance of JC	Phase 4 by March 2012.	
G	Are there selection and training processes to ensure the objectivity and competence of auditors, as well as the impartiality of the audit process? CAR 107.03, 302.503(5)	No		Develop and document as part of the quality assurance system in Component 5 in Phase 4.	L. O'Connell with assistance of JC	Phase 4 by March 2012.	
H	Is there a documented procedure to record verification of action(s) taken and the reporting of verification results? CAR 107.03, 302.503(4), 302.503(3)(g)	No		Develop and document as part of the quality assurance system in Component 5 in Phase 4.	L. O'Connell with assistance of JC	Phase 4 by March 2012.	
I	Does the organization perform a periodic Management review of safety critical functions and relevant safety or quality issues that arise from the internal evaluation program? Reference: CAR 107.03	No		Develop and document as part of the quality assurance system in Component 5 in Phase 4.	L. O'Connell with assistance of JC	Phase 4 by March 2012.	
J	Is there a documented procedure for reporting audit results and maintaining records? CAR 107.03, 302.503(4)	No		Develop and document as part of the quality assurance system in Component 5 in Phase 4.	L. O'Connell with assistance of JC	Phase 4 by March 2012.	

K	Is there is a documented procedure outlining requirements for timely corrective and preventive action in response to audit results? CAR 107.03, 302.503(3)(f)	No		Develop and document as part of the quality assurance system in Component 5 in Phase 4.	L. O’Connell with assistance of JC	Phase 4 by March 2012.	
L	Does the SMS include processes for the auditing of the quality assurance program? CAR 107.03(g)	No		Develop and document as part of the quality assurance system in Component 5 in Phase 4.	L. O’Connell with assistance of JC	Phase 4 by March 2012.	
M	Is there a process to evaluate competence to perform duties? CAR 107.03(d)	No		Develop and document as part of the quality assurance system in Component 5 in Phase 4.	L. O’Connell with assistance of JC	Phase 4 by March 2012.	
Component 6: Emergency Preparedness—Element 6.1: Emergency Preparedness and Response							
A	Does the organization have an emergency preparedness procedure appropriate to the size, nature and complexity of the organization? CAR 107.04, 302.202(1)	Yes	The Airport has an Emergency Response Plan as part of the Airport Operations Manual approved by Transport Canada.				
B	Have the emergency preparedness procedures been documented, implemented and assigned to a responsible manager? CAR 107.03(f), 302.202(2)	Yes	Emergency response procedures have been documented for: crash on airport, crash off airport, standby aircraft emergency, structural fires, structural fire, bomb threat aircraft, bomb threat building, hijacking, hazard material handling and medical emergency.				
C	Have the emergency preparedness procedures been periodically reviewed as a part of the management review and after key personnel or organizational changes? CAR 107.03, 302.202(4)	Yes	Amended when key personnel and organizations change. Yearly table top exercises and full exercises every 3 years.				

D	Does the organization have a process to distribute the emergency response plan (ERP) procedures and to communicate the content to affected personnel? CAR 107.03(f), 302.203(1)(z)(ii)	Yes	Extensive distribution list is part of the Emergency Response Plan.				
E	Has the organization conducted drills and exercises with all key personnel at intervals defined in the approved control manual? CAR 107.03(d), 302.208	Yes	The airport conducts table top exercises and full exercises in accordance with CAR regulations.				

