

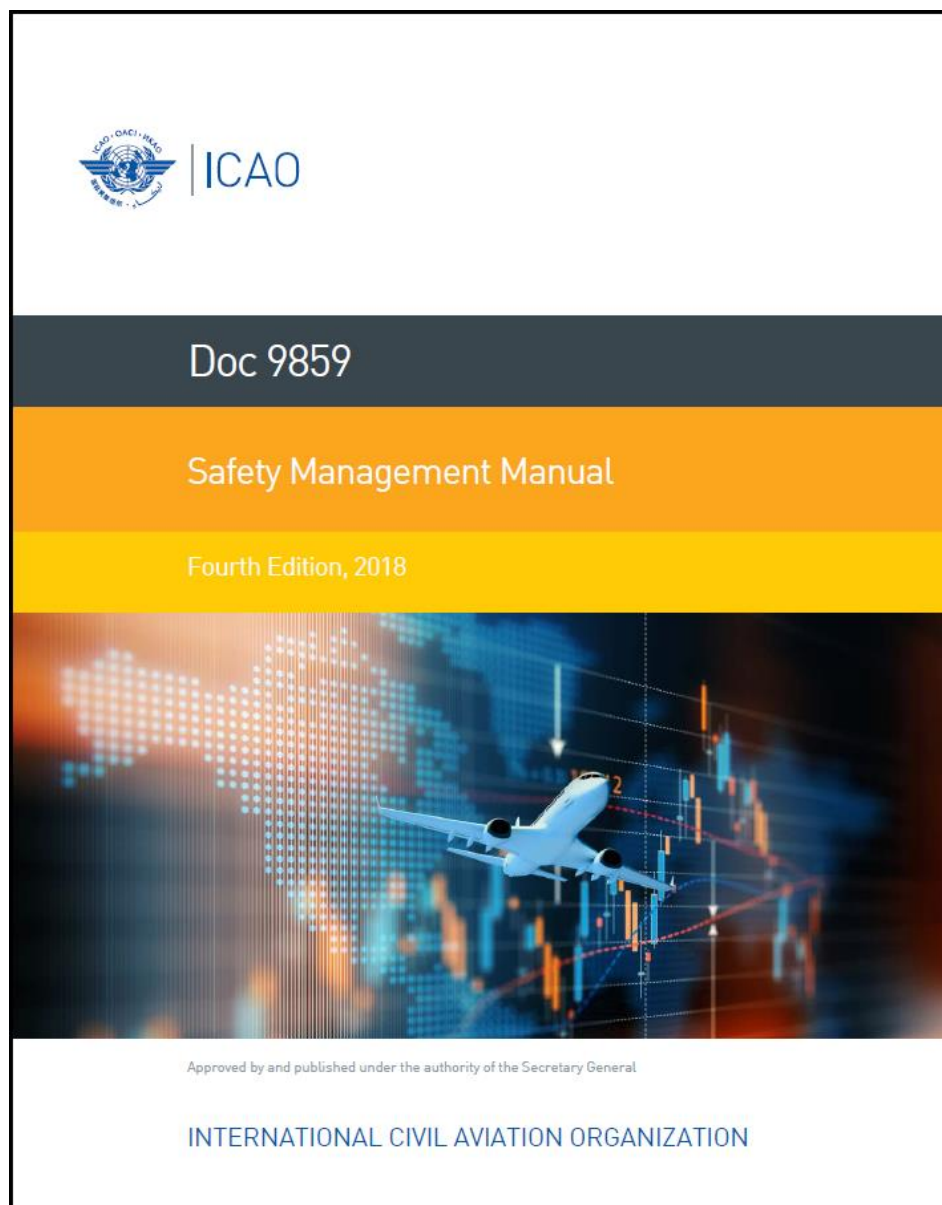


Information Article



Why do many airlines legally require Emergency Response Plans (ERP)?







Example 1 - Below (and next page) are *extracts* from a *real* ERP used by a *real* airline

Associated Information 1 - Safety Management System - relationship with the Airline ERP

As per ICAO **Annex 19** (Safety Management) and its / the associated ICAO **Doc 9859** (Safety Management Manual [SMM]) - most major, commercial airlines are required to establish, operate, maintain and regularly review a '**Safety Management System**' (SMS)

(In very general terms the primary objective of an SMS is to continually improve an organisation's overall safety [particularly with regards to aircraft operations] - with the associated objective of preventing accidents and incidents - and thus the associated 'knock-on' [adverse] consequences)

The 'top-level' requirement to have / operate an SMS comes from ICAO. This is typically 'devolved' to individual 'states' (countries) which ensure (e.g. via associated legislation / regulation) that certain * types of (typically commercial) aircraft operation (primarily 'based' in such countries) **must** have an '**approved**' and **current** SMS in place

* Also applies to certain **airports**, aviation **maintenance** organisations, **air navigation** service providers, **flying training** organisations and organisations responsible for the **type design and / or manufacture of aircraft** etc.

A relatively small (but nonetheless significant) element of implementing / operating an SMS requires certain aircraft operators (predominately again [but not exclusively] commercial passenger airlines) to have in place a '**fit for purpose**' **emergency response plan** (ERP) - primarily used to prepare for, manage and deal (in reality) with the response to a 'significant adverse impact' type aircraft accident

That such a fit for purpose ERP (and everything that goes with it) is (or will be) 'in place' is typically overseen by a country's Civil Aviation Authority / equivalent agency

The (insert name of airline here) document being read now (Crisis Response Planning Manual [CRPM] Part 1 / Vol 1 [ERP Executive Summary]), taken together with the other nine volumes of CRPM Part 1 - constitute the (insert name of airline here) **ERP** for (ICAO / State / Civil Aviation Authority etc.) SMS (and thus ICAO Annex 19) purposes

(Insert name of airline here) has taken the option (alternative means of compliance) of producing its ERP as a **stand-alone** document. Appropriate cross-reference shall be made in the associated SMS

Similarly, the airline's 'Aircraft Incident', 'Public Health Crisis', 'Natural Disaster', '**Business Continuity**' and '**Aircraft Recovery / Removal / Salvage**' Plans are also standalone documents. **Only** the first three just above (in addition to the ERP) are primarily produced, 'managed' and maintained by the (insert name of airline here) person appointed as 'Emergency Response Planning Manager' (or equivalent title)

The airline's 'Air Accident Investigation' Manual is produced, managed and maintained by the (insert name of airline here) person appointed as '(Flight) Safety Manager' (or equivalent title)

The (insert name of airline here) '**accountable manager**' commits 100% to support ongoing development and resourcing of the airline's ERP - together with conduct of the associated and ever on-going training, exercising, review, maintenance and continual improvement required





Associated Information 2 - Provision of Humanitarian (Family) Assistance Services

Wherever possible, practicable and appropriate / suitable so to do, the policy and implementation advice contained in (separate) ICAO Docs **9998** (*Policy* on Assistance to Aircraft Accident Victims and their Families) and **9973** (*Manual* on Assistance to Aircraft Accident Victims and their Families) respectively - shall be considered and accounted for when planning / activating / implementing associated elements of the (name of airline required here) **ERP** (CRPM Part 1)

CRPM Part 1 (**ERP**) addresses the airline's humanitarian (family) assistance related accountabilities via its component **Volumes 3** (Humanitarian Assistance Team Ops) and **4** (Emergency Call / Contact / Information Centre Ops). Combined, they form the basis of the airline's '**Family Assistance Plan**'

Due manpower / other resources related constraints, the airline outsources actual (tactical) management and operation of the above accountabilities – whilst retaining strategic oversight of both during any actual implementation of same. Further details will be found in Volumes 3 and 4





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Note: The below info re HKG CAD was written in 2017 when ICAO Doc 9859 (SMM) was in its 3rd edition (2013)

In 2018, the 4th edition of Doc 9859 was published

Whilst this latter document still provided for the 'Emergency Response Plan' requirements (same in principle as per 3rd edition) - **most of the associated (and useful) explanatory material available in Edn 3 had unfortunately been removed** (from Edn 4)

This was an unnecessary, retrograde step by ICAO

Example 2 - from a *real* Civil Aviation Authority

HKG CAD (Hong Kong Civil Aviation Department)

CAD 360 - AOC (Air Operator's Certificate)

(2017 Amendment)

10.8 The (Air) Operator's SMS (Safety Management System) shall contain an Emergency Response Plan (ERP). Operator shall also include a Family Assistance Plan (FAP) in its ERP - re aircraft accident victims and their families. Note: Further details and guidance can be found in CAD 712 (Safety Management Systems - A guide to Implementation), ICAO Doc 9859 (Safety Management Manual), ICAO Doc 9973 (Manual on Assistance to Aircraft Accident Victims and their families) and ICAO Doc 9998 (ICAO Policy on Assistance to Aircraft Accident Victims and their Families).

CAD 712 (Safety Management Systems - A guide to Implementation)

5.8 Emergency Response Planning

An emergency response plan (ERP) outlines in writing what should be done upon a major incident or accident. The purpose of an ERP is to ensure:

- Planned actions to minimize indirect or consequential damage upon the occurrence of a major incident or accident
- Recovery actions as well as procedures for orderly transition from normal to emergency operations
- Designation of emergency authority
- Assignment of emergency responsibilities
- Authorization by key personnel for actions contained in the plan
- Coordination of efforts to cope with the emergency
- Safe continuation of operations, or return to normal operations as soon as possible.

An ERP could cover the different aspects of emergency response, such as governing policies, notifications, initial response, additional assistance, crisis management centre (CMC), records, management of the accident site, news media, formal investigations, family assistance, post critical incident stress counselling and post occurrence review





APPENDIX A to CAD 712: GUIDANCE FOR THE DEVELOPMENT OF AN SMS MANUAL

Manual Contents (SMM)

1. Document Control Requirements
2. SMS Regulatory Requirements
3. Scope of SMS
4. Safety Policy
5. Safety Objectives and Performance Targets
6. Roles and Responsibilities
7. Non-Punitive Reporting Policy
8. Safety Reporting
9. Hazard Identification and Risk Assessment
10. Safety Performance Indicators
11. Safety Investigations
12. Safety Management Training
13. Safety Auditing
14. SMS Data and Records Management
15. Management of Change
16. **Emergency Response Plan**

16. Emergency Response Plan

Objective

Describe the organisation's intentions and commitment to dealing with emergency situations and their corresponding recovery controls. Outline the roles and responsibilities of key personnel. The Emergency Response Plan can be developed as a separate document or placed in this manual.

Criteria

- The organisation has an emergency plan that outlines roles and responsibilities in the event of an accident
- There is a notification process that includes an emergency call list and an internal mobilisation process
- The organisation has arrangements with other agencies for aid and the provision of emergency services as applicable
- The organisation has procedures for emergency mode operations where applicable
- ***There is a procedure for overseeing the welfare of all affected individuals and for notifying next of kin***
- The organisation has established procedures for handling media and insurance related issues
- There are defined accident investigation responsibilities within the organization (Not ERP)
- The requirement for preservation of evidence, securing affected area and mandatory/governmental reporting is clearly stated
- There is emergency preparedness and response training for affected personnel
- A disabled aircraft removal plan is developed by the organization in consultation with aircraft owners, aerodrome operators or other agencies as applicable (Not ERP)
- A procedure exists for recording activities during an emergency response





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CROSS-REFERENCES

If you find that any of the following links have 'stopped working' and you still need to access the required document / info (as originally linked to) - please conduct an internet search using appropriate key words

ICAO Annex 19 - 2nd Edn - July 2016

https://caainternational.com/wp-content/uploads/2018/05/AN19_2ed-publication.pdf

See Section 4.1; Appendix 1 and Appendix 2 (Sections concerning ERP)

Note: Annex 19 is the 'parent' document of ICAO Doc 9859 (SMM) (latter doc linked to immediately below).

Note, however, that Annex 19 itself *provides very little detail* on the subject of the ERP

ICAO Doc 9859 - [Safety Management Manual](#) - 3rd Edition - 2013

See example on page 149 - 1.4 - Emergency Response Planning

See example on page 155 - 1.4 - Emergency Response Planning

See page 160 - 5.3.4 / 1 / 1.4 - Emergency Planning

See page 160 - SMS Element 1.4 - Co-ordination of Emergency Response Planning

See page 191 - Table 5.2 - Phase 2 - Para 3a- Establish ERP

See page 193 - Co-ordination of Emergency Response Planning - Element 1.4

See page 207 - App 3 to Chapter 5 - Emergency Response Planning

See page 221 - 15/ Emergency / Contingency Response Plan

See page 239 - Table 5/A7/1 - Element 1.4 - Co-ordination of ERP





ICAO Doc 9859 - [Safety Management Manual](#) - 4th Edition - 2018

Note: ICAO Doc 9859 - 4th Edn - 2018.....*contains little useful (ERP related) information compared to what was provided in the 3rd Edition - referred to on the previous page*

Suggest that the reader sticks with the 3rd Edn, but also has a look through the relevant parts of the 4th edition - just in case something useful (unlikely) is found. (It is not clear why much of the useful ERP related content [from the 3rd Edition] was removed from the 4th Edn???)

ICAO Doc 9998 / AN 499 - 1st Edn 2013 - ICAO [Policy](#) on Aircraft Accident Victims and their Families

http://www.icao.int/Meetings/a38/Documents/DOC9998_en.pdf

It is suggested that the 'serious' reader becomes **very** conversant with this latter document and its 'amplifying' document referred to next below (ICAO Doc 9973)

ICAO Doc 9973 / AN 486 - 1st Edn 2013 - [Manual](#) on Assistance to Aircraft Accident Victims and their Families

https://www.icao.int/SAM/Documents/2016-AIG-RECORDSPRO/Doc%209973.Family%20Assistance_en.pdf





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The European Union

For the 'interested' reader, the links below provide a very limited (and representative only) insight into how a legally-bound group of countries (the European Union) have addressed the requirements of ICAO's Annex 19 / Doc 9859 (and, as part of so doing, should thus have also addressed the associated ERP elements of same):

<https://www.easa.europa.eu/domains/safety-management/safety-management-system/sms-international>

<https://www.easa.europa.eu/domains/safety-management/safety-management-system/sms-europe>

<https://www.easa.europa.eu/domains/safety-management/safety-management-system/sms-easa-rules>

And a further insight re how the EU has addressed the 'Family Assistance' related aspects which any 'fit for purpose' ERP must address:

Regulation (EU) 996 / 2010

See paras (30) to (33)

See Article 15 - paras 4 and 5

See Articles 20 and 21

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010R0996>

IMPORTANT NOTE: From author / owner of this info article (the one you are reading right now):

As at early 2024, ICAO and most of the world's countries had made no significant progress in advancing the cause of support for 'Aircraft Accident Victims and their Families. An 'infamous' example of the latter is the above referred to 'Regulation (EU) 996 / 2010

10 years (i.e. in late 2020) after this regulation was first published, only 3 of the (what were then 28 EU countries) had complied with this regulation

Spain made a good job of it in 2013; **Italy** did well in 2014 and the **Netherlands** was 'forced' to 'do it' in late **2016** as a consequence of acknowledged 'very poor service' to the families of deceased victims of Malaysian Airlines flight MH17 (shot down over Ukraine in July **2014** [68% of PAX were Dutch Nationals])





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IATA

IATA member airlines must undergo (and pay for) IATA's bespoke audit (known as 'IOSA') every 2 years

Non-member airlines can also subscribe to (and pay for) the IOSA audit on a voluntary basis. 2 yearly renewal is not mandatory for the latter

The scope of the IOSA audit covers the airline customer's 'Emergency Response Plan' in a fair degree of detail - much of it driven by the associated requirements of *ICAO Annex 9*; *ICAO Annex 19*; *ICAO Doc 9859* / 'SMS'; *ICAO Docs 9973 & 9981* / 'Family Assistance' etc.

ANYTHING ELSE

There will no doubt be additional considerations in place around the world with regards to there being a lawful / regulatory / best practice etc. requirement for certain, aviation associated service providers (for a list of the latter see 'boxed' text on page 3 - 4th para [marked with an asterisk thus: *]) to originate, maintain, review, improve, train and exercise etc. ***an appropriate 'emergency response plan'***

The main considerations have already been briefly covered / cross-referred to herein

All others are beyond the scope of this short information article

