

To The Point

Airport Safety Management System (SMS) Guidance

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Airport Safety Management Systems (SMS) help airports proactively identify and mitigate safety hazards, thereby reducing the likelihood or recurrence of accidents in air transportation.

The Final Part 139 rule requiring Safety Management Systems for certain Part 139 certificated airports was approved and issued by the Federal Aviation Administration (FAA) and went into effect on April 24, 2023. The rule added “Subpart E (§§ 139.401-403), Airport Safety Management Systems” to “14 CFR Part 139 - Certification of Airports” and included some additional changes within Part 139 as well.

Subpart E is available at:

www.faa.gov/airports/airport_safety/safety_management_systems/external/part_139_SMS_subpartE

Airport Qualifications

SMS implementation will be required for certain airports that meet the qualifying criteria under 14 CFR 139.401(a).

In short, an SMS is required if the certificate holder meets at least one of the following:

- It is classified as a large, medium, or small hub based on passenger data extracted from the Air Carrier Activity Information System.
- It has an average of 100,000 or more total annual operations, meaning the sum of all arrivals and departures over the previous three calendar years.
- It is classified as a port of entry, designated international airport, landing rights airport, or user fee airport.

The list of Part 139 airports required to implement SMS is presented by the FAA, and it is available at:

www.faa.gov/airports/airport_safety/part_139_cert/part_139_airport_certification_status_list

Implementation Timeline

As of the effective date of the rule (April 24, 2023), §139.403 provides the following timelines for qualifying airports:

- 12-24 months to submit an Implementation Plan (IP) to the FAA for approval
 - Hub airports within 12 months, airports with 100,000 operations within 18 months, and other international airports within 24 months
- 12 months to submit an Airport Certification Manual (ACM) amendment and Safety Management System manual after the FAA has approved the Implementation Plan
- 36 months to fully implement the SMS after the Implementation Plan approval

Implementation Best Practices

Consideration should be given to best practices in facilitating SMS compliance.

- Find an SMS champion (i.e., SMS Manager, Safety Coordinator, Safety Specialist) to work with Airport Operations and lead the SMS development and implementation.
- Obtain management support to implement and operate the SMS.
- Conduct a Gap Analysis to find missing SMS elements and to identify opportunities to implement elements using existing processes and tools. The Gap Analysis is the basis for developing an implementation plan and SMS Manual.
- Establish a safety organizational structure and safety committee structure (at strategic, tactical, and action levels) compatible with the airport's organization, and define the SMS responsibilities of each function. Use a simplified safety organizational structure at small airports.

- Develop an SMS Implementation Plan that complies with Part 139 requirements and is compatible with FAA Advisory Circular "AC 150-5200-37A Safety Management Systems for Airports" based on the Gap Analysis and safety organizational structure.
- Provide SMS training to the SMS champion and key management/staff.
- Implement SMS components and elements gradually to help gain employees' acceptance and enhance the airport's safety culture.
- Implement required SMS components (Safety Policy and Safety Organizational Structure, Safety Risk Management, Safety Assurance, and Safety Promotion) and the SMS elements specified in the Part 139 requirements.

Key Recommendations

Key recommendations should be considered to determine the next steps in SMS compliance.

Leadership:

- Ensure that top management understands how an SMS works, how it will benefit decision-making, and how their support is critical for a successful SMS implementation.
- Seek an airport SMS specialist to assist with the airport's Safety Management System when needed.
- Make the SMS as practicable and objective as possible; start simple and evolve from there.

Administration:

- Manage the airport SMS under Airport Operations but get support from other departments.
- Refrain from overwhelming the staff with information that will not be used.
- Provide in-depth SMS training to the champion and key staff members.

- Be aware of the required timelines, but do not wait for the completion and approval of the Implementation Plan to initiate the implementation of SMS elements.

Implementation:

- Focus initial SMS efforts on compliance with the revised Part 139 rule instead of embracing an enterprise-wide risk management system to include terminal, landside, and business risks.
- Recall that this new FAA requirement is for airside only before complying with the new rule. It will require referencing the SMS in the airport's ACM and will be evaluated by FAA Part 139 certification inspectors.
- Use SMS software to help operate the SMS. Smaller airports can use off-the-shelf electronic spreadsheets and database applications. Larger airports are expected to need more comprehensive software that can be integrated into the airport's existing processes. However, start using information from existing systems to help evaluate and analyze data required for an SMS before procuring software or systems.

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