

SAFETY MANAGEMENT SYSTEM – JAPAN

The Japanese Ministry of Land, Infrastructure, Transport and Tourism (MLIT), which is the parent ministry of the Japanese Civil Aviation Bureau (JCAB), is soliciting public comment on forthcoming Japanese rules concerning Safety Management Systems (SMS) to be implemented by companies that manufacture, maintain or modify civil aircraft and aircraft parts.

It appears that MLIT intends to impose by April 1, 2011 SMS requirements on companies that maintain or modify aircraft and aircraft parts. SMS requirements would be imposed on manufacturers by November 14, 2011.

Interested U.S. companies are urged to submit comments to MLIT no later than the deadline of October 4, 2010. Comments may be submitted to: g_CAB_GIJ_KKA@mlit.go.jp

The public comment notice does not specify that comments must be in Japanese, but that is usually the case. Unfortunately, the U.S. Government cannot translate industry comments for submission.

The U.S. Department of Commerce would appreciate receiving copies of any comments. Please cc: English language versions of your comments to: fred.elliott@trade.gov in the Commerce Department.

Following is a loose translation of the MLIT notice soliciting comments. In addition to this, the JCAB has released the attached document providing additional details on its plans for SMS implementation, including rules for manufacturers.

Partial Revision of the [Basic Guiding Principles regarding Site Accreditation]

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Aviation Safety Office, Technical Unit,
Aviation Division

Background

Recently, annexes to the International Civil Aviation Organization's convention have been revised, and the introduction of a Safety Management System at organizations that design, manufacture, and maintain airplanes and airplane parts is required. Because of this we are considering revising the appropriate Japanese government measures in the manner outlined below. *[Legal citations to Japanese laws and regulations have been omitted.]*

Outline of Revisions

Given the need for standards for accreditation of approved organizations, we have drafted the following, and plan to require the approved work as is listed therein.

- (1) Policies of the operation of services to ensure the safety or airplanes and parts.

While setting down the basic policy regarding the safety of operations, the laws and ordinances and statutes will be strictly adhered to, with the efforts to attain safety given equal importance.

- (2) Implementation and management structure of the services to ensure the safety or airplanes and parts.

The power, authority and primary responsibility regarding safety of the accredited organization and positions will be set down, and the clear structure of the reporting system and rules of supervision will be formulated. Also, the individual responsible for the overall safety management of the organization will be appointed.

- (3) Implementation and management method of the services to ensure the safety of airplanes and parts.

The following items will be put in place to identify the hazards of work, analyze the risks, and put in place the necessary countermeasures.

- Urgent response plans for cases where accidents regarding planes and parts occur.
- A management method of archiving the documentation or activities of the SMS.
- A method to identify hazards based on the collected information related to safety.
- A method to analyze risk of identified hazards and to develop countermeasures.
- A method to verify the implementation of work and management conditions.
- A method to improve the implementation and management of work.
- The teaching and training to permeate SMS in accredited sites.
- A method to collect information regarding safety and to assess the necessary ranks and categories.

[Details regarding how certain documents will be processed as well as pointing out how people related to SMS will be handled have been omitted.]