

JAA/FAA/TCA
International MRB Policy Board
Issue Paper

19 July 2002
IMRBPB # 054

Title	Implementation of IMRBPB Positions
Submitter	TCCA
Issue	The Charter of the IMRBPB limits this body to “ <i>advocating the standardization of MRB policy and procedures.</i> ”
Problem	It is evident and a matter of concern that members have not in a timely manner implemented the harmonized positions adopted by the IMRBPB as policy. This is causing problems with respect to ensuring that the positions taken with IMRBPB are being implemented by the convenors of new and existing MRBs. As a result unsatisfactory MRBRs continue to be approved. There is also reluctance by convenors to implement a harmonized position, since their domestic industry would portray themselves as being unfairly penalized should they be forced to lead the aviation industry in implementing of a new IMRBPB position.
Recommendation.	<p>It is recommended that the process presented within Attachment A to this Issue Paper be considered and that a structured process be developed which would ensure the positions taken by the IMRBPB are adopted by the Member Authorities as policy within a given time period.</p>

IMRBPB Position.

Aug 20, 2003 **See attachment 1 for update**
To remain open

October 20th, 2005

A new column with link and/or references to the policy implementing the decision will be added to the IP index in order to close this IP.

Status: Closed

Important Note: The IMRBPB positions are not policy. Positions become policy only when the policy is issued formally by the appropriate National Aviation Authority. (JAA, FAA or TCCA)

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Attachment 1

Objective:

The objective of this paper is to present a structured process for ensuring that harmonized positions taken by the IMRBPB are implemented by member authorities within a given time frame.

Process:

1. Each member authority would brief and present in writing the process (including typical timelines) by which a harmonized position taken by the IMRBPB could be implemented within their domestic jurisdiction.
2. The processes identified in 1) would be collectively reviewed to ascertain what external influences (stakeholder interests) would or could be exerted on a position taken by the IMRBPB with respect to any individual member authority's ability to implement that position as policy. The intent of this review would be to constructively establish a process by which the individual member authority's needs are met prior to a position being taken by the IMRBPB.
3. The processes identified in 1) would also be collectively reviewed with the intent to ascertain harmonized policy implementation timelines (90 days for example) when establishing individual IMRBPB positions,
4. Should the review of 2) above reveal obstacles in the process pathway that would impede the timely implementation of harmonized positions the IMRBPB members would seek, through common agreement of higher authority within their individual organizations, the removal or emplacement of alternative processes and powers that would mitigate those obstacles.
5. Upon completion of steps 1) through 4) as stated above, a structured process would be published for the implementation of IMRBPB harmonized positions as policy within each member authority's jurisdiction.
6. These structured processes would be appended to the Charter and the Charter amended as necessary to reflect their existence and intent.

Project Completion:

It is suggested that the IMRBPB should attempt to complete steps 1 through 4 above within 6 months and fully complete the process within one year. The realization of this objective would be signified by the amendment and re-issue of the Charter to include the structured processes and language as envisioned by item 6 above.

Implementation of IMRBPB Positions cont. August 2003 update

JAA stated that their handbook already addresses many of the processes being implemented and that it is being amended as required to reflect new decisions taken at the IMRBPB.

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The FAA stated that they are issuing policy letters and memos to advise and implement the decisions taken by the IMRBPB. This will then be published on the AFS 300 website.

TCCA stated they are using TP 13850 to implement IMRBPB decisions. TCCA also stated they are using Staff Instructions and Airworthiness Notices to assist in implementing policy and informing Industry.