

**Frequently Asked Questions (FAQs)**  
**on**  
**Regulated Air Cargo Screening Facilities (RACSF)**

**General**

Q1: What are the new requirements under the International Civil Aviation Organization's (ICAO) policy direction?

A1: In September 2016, the ICAO announced its policy direction that consignors not subject to approval by the authority for aviation security should be phased out by 30 June 2021. Consignors either have to:-

- (i) be approved by the appropriate authority as a "validated" Known Consignor (KC);  
or
- (ii) be an "unknown consignor" with all their cargo subject to 100% security screening prior to being loaded on to a commercial aircraft.

Q2: How did Hong Kong respond to meet the security requirements under the ICAO's new policy direction?

A2: Hong Kong has an obligation to meet ICAO's security requirements. Under such requirements, consignors not subject to approval by the Civil Aviation Department have been phased out and become unknown consignors from 1 March 2021. Their air cargo shall be 100% screened prior to being loaded onboard aircraft since then. In view of the upsurge in screening demand, the Civil Aviation Department (CAD) launched the Regulated Air Cargo Screening Facilities (RACSF) scheme which enables and regulates air cargo screening at off-airport locations. Interested entities can conduct air cargo security screening operations in their premises once such sites are accepted by the CAD as RACSFs.

Another way to meet ICAO's new policy direction is the validation of consignor as Known Consignor (KC). The KC Validation Scheme was developed in consultation with air cargo industry representative bodies. Consignors which produce / manufacture or assemble goods for transport as air cargo from secure facilities within Hong Kong can apply to the CAD for validation as a KC. For more details, please refer to the following CAD website:

[https://www.cad.gov.hk/english/vkc\\_reg.html](https://www.cad.gov.hk/english/vkc_reg.html)

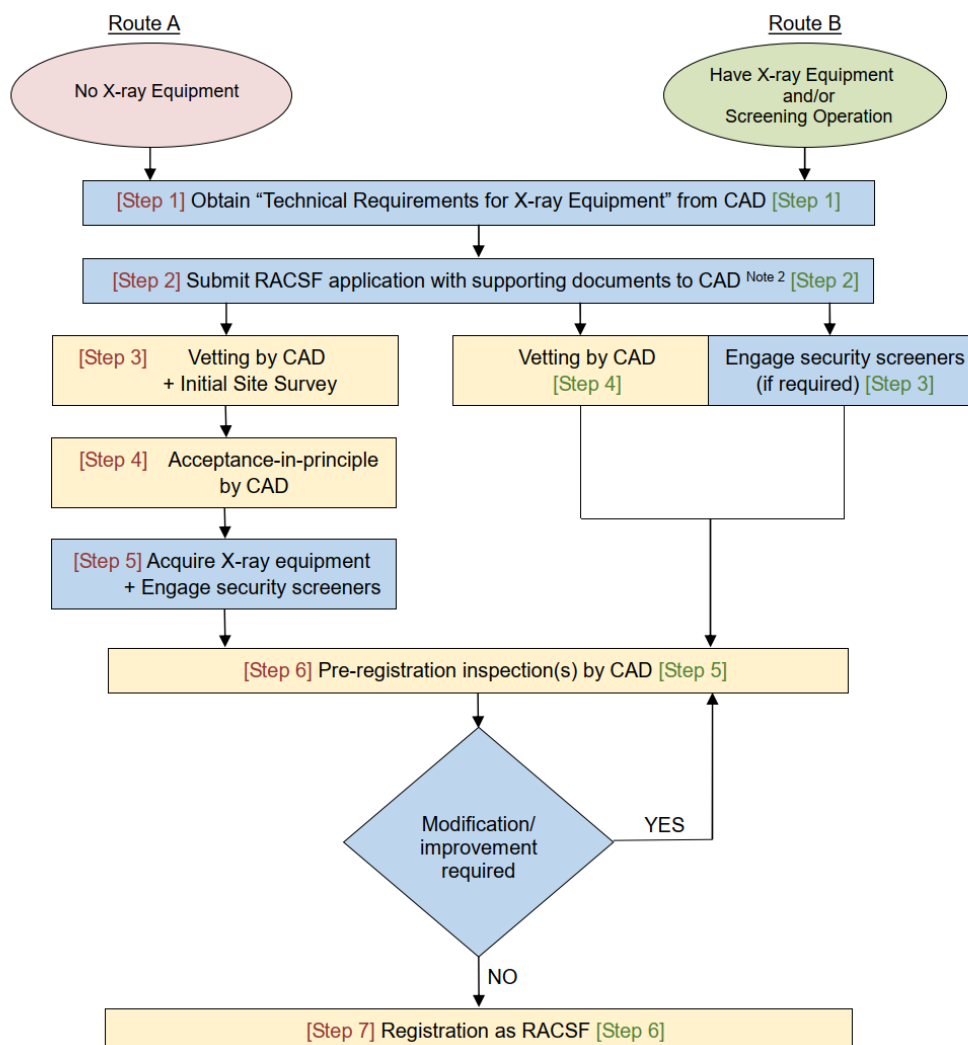
## Application

Q3: Who are eligible to apply to become RACSF?

A3: Any entity (such as Regulated Agent, warehouse operator or any other entity) which intends to operate off-airport x-ray screening operations are eligible to apply. It is not mandatory for Regulated Agent to become RACSF if the Regulated Agent does not operate off-airport x-ray screening operations.

Q4: What are the processes involved in the application for registration as RACSF?

A4: The two routes for application for registration as RACSF, (A) the applicants who have NOT acquired x-ray screening equipment, and (B) the applicants who have acquired x-ray screening equipment and/or are performing screening operations, are illustrated below. For details, please refer to the [RACSF Application Form](#).



Q5: How long does it take to process an application for registration as RACSF?

A5: There are two routes of application for registration as RACSF.

Route A: If the applicant has not acquired x-ray equipment, the applicant should reserve the time required for (i) acquiring and installation of x-ray equipment, (ii) engagement of security screeners, and (iii) at least 3 months for CAD's processing of its RACSF application before the intended date of operation of the RACSF.

Route B: If the applicant has acquired x-ray equipment, the applicant is advised to submit the application at least 3 months before the intended date of operation of the RACSF. The applicant should also reserve time for the engagement of security screeners.

The above is the normal processing time for an application. It may take a longer time if the applicant is required to submit further document proof for consideration by CAD (e.g. more detailed information about the proposed x-ray screening equipment), to improve its security measures and/or revise the RACSF Security Programme, or if there is a large number of RACSF applications submitted to CAD at the same time.

Q6: Will an RACSF application under Route A (i.e. x-ray equipment has not been acquired) be considered if the proposed warehouse facility is still in the planning stage and the site cannot be made available immediately for physical inspection by CAD?

A6: The RACSF applicant may still submit an RACSF application to CAD for consideration or initial acceptance in-principle. In this case, the applicant should (i) provide a written explanation to CAD detailing the reasons why the subject site is not available at the moment; and (ii) as far as practicable, generally outline the tentative security measures and arrangements for the application. The final acceptance of RACSF will be subject to (i) the provision of all the required documents; and (ii) the results of the pre-registration inspection(s) to ensure that all appropriate security measures and arrangements are in place.

Q7: What is the validity period of RACSF?

A7: There is no expiry date on RACSF registration as long as the RACSF operator is able to continuously comply with the relevant requirements. RACSF is subject to CAD's monitoring of the compliance with the RACSF Security Programme, Handling Procedures for RACSF, notices and any other directions given from time to time by CAD. Non-compliance may result in suspension or de-registration of the RACSF status.

Q8: Are applicants required to specify the model of x-ray equipment to be installed even for applications under Route A? What other information regarding the equipment shall be included?

A8: Applicants under Route A should specify the model of the x-ray equipment to be installed at the RACSF. Applicants should also provide the following information regarding the equipment when submitting the application for initial assessment:

(i) technical specifications;

(ii) documents demonstrating that the equipment is certified by other authorities, e.g.

- US Transportation Security Administration (TSA)
- European Civil Aviation Conference (ECAC)
- UK Department for Transport (DfT)
- Civil Aviation Administration of China (CAAC)

(iii) Any other information that may be useful for the assessment, e.g. list of airports/facilities (in Hong Kong and other places) that the subject x-ray equipment are currently in use.

## Screening

Q9: Can RACSF company staff members become certified security screeners through certification by a Certification Body (CB)?

A9: Having been trained and certified by a Certification Body (CB), company staff members of RACSF operator may serve as certified security screeners to conduct cargo screening in the RACSF.

Q10: What criteria should security screeners meet to perform screening duties in RACSF?

A10: The security screeners shall fulfill the selection criteria in respect of medical fitness and academic qualifications. Besides, security screeners, whether or not employed by RACSF or from a screening service contractor, shall be trained and certified by a Certification Body (CB) before they are allowed to perform the screening duties of air cargo in RACSF; and attend refresher training conducted by a CB and be recertified by such CB once every 12 months. For details please refer to Part II Sections 9.2 and 9.3 of the RACSF application form.

Q11: What are the requirements on the daily duty time limit for security screeners?

A11: According to the Hong Kong Aviation Security Programme (HKASP), which is built upon the International Civil Aviation Organization (ICAO) requirements and guidelines, a person engaged in aviation security work which involves screening of cargo shall be restricted to working (as a security screener) for not exceeding a total of 8 hours a day (excluding meal breaks) unless for emergency or under exceptional circumstances. Planned or regular shift patterns would not be considered as “under the emergency or exceptional circumstances”. Security screeners shall have adequate rest between continuous screening duties/shifts and they shall not take up other work duties which may impair their security screening work performance which requires a high degree of mental concentration.

Q12: In the event that a security screener has worked beyond the daily duty time limit under the emergency or exceptional circumstances, what should an RACSF do?

A12: According to the HKASP, a report detailing the reasons for extending the security screener working hours beyond the duty time limit should be submitted for CAD’s review. Planned or regular shift patterns for extending the working hours beyond the duty time limit would not be counted as “under the emergency or exceptional circumstances” and accepted.

Q13: What screening methodologies shall be adopted by RACSF in screening of air cargo?

A13: Under the CAD's air cargo security regime, x-ray screening shall be the primary screening method for air cargo. Yet, for cargo which are genuinely difficult or cannot be screened by x-ray equipment, RACSFs may, taking into consideration the nature and content of the cargo, apply one of the following alternatives:

- (i) Search by hand or physical check at piece level;
- (ii) Explosive trace detection (ETD);
- (iii) Other screening methods proposed by RACSFs and accepted by the CAD.

Screening of air cargo at RACSFs shall be conducted by the security screeners certified for performing cargo screening. Where a cargo consignment cannot be effectively screened using one of the above screening methods, or even a combination of such, the consignment shall be rejected for carriage onto aircraft. In general, RACSFs who adopt hand search/ETD as the primary screening method would not be accepted by CAD. For more details, please refer to the Notice to RACSFs 3/2020, which is available at:

[https://www.cad.gov.hk/english/pdf/Notice\\_to\\_RACSF\\_3-2020.pdf](https://www.cad.gov.hk/english/pdf/Notice_to_RACSF_3-2020.pdf)

Q14: How to screen oversize/odd cargo (e.g. aircraft engine) which cannot pass through x-ray screening machine tunnel?

A14: For security screening of oversize/odd-size cargo which cannot be further broken down into smaller pieces for placing into x-ray equipment, the use of ETD would generally be considered to be acceptable.

Q15: What are the shipping documents required to be made available for x-ray screening?

A15: It is stipulated in the HKASP that, where x-ray screening of the consignment takes place, the security screeners should have access to the details of what the consignment contains, in order that this can be verified against the x-ray image. Though there is no specific requirement on the type of shipping documents to be made available during screening, a documentary means to enable the security screeners to know what the consignment contains should be available. The above requirements are imposed on aircraft operators/RAs and will also be applicable to RACSFs.

Q16: What are the requirements on the keeping of screening records under the RACSF regime?

A16: RACSF operator shall maintain a log of all security screening conducted. The security screening log can be kept in electronic format or in hardcopies. RACSF operator shall also issue a receipt as proof of security screening and indicate on the receipt that the cargo have been "security checked" with the screening method(s) adopted (e.g. "x-ray", "hand search", "ETD"), the company name of the RACSF operator (e.g. in company chop), and the RACSF code as assigned by CAD, etc. RACSF operator who is also an RA may not need to issue receipts to itself after conducting self-screening of air cargo, if the RACSF operator has already maintained security screening log. Records of screening shall be kept for a minimum period for 3 months for inspection by CAD.

The RACSF shall maintain the x-ray images / other recordings of screened cargoes (e.g. analysis results of ETD and photo records of hand search/physical check at piece level) for at least 31 days after screening is conducted. Further details can be found in the RACSF Application Form, the Handling Procedures for RACSFs and Notice to RACSFs 3/2020, which is available at:

[https://www.cad.gov.hk/english/icao2021\\_form.html](https://www.cad.gov.hk/english/icao2021_form.html)

[https://www.cad.gov.hk/english/pdf/Notice\\_to\\_RACSF\\_3-2020.pdf](https://www.cad.gov.hk/english/pdf/Notice_to_RACSF_3-2020.pdf)

Q17: How should the air cargo screened at RACSF be protected and checked to ensure its security integrity?

A17: RACSF operators shall maintain a log of all security screening conducted in electronic format or in hardcopies, and issue a receipt as proof that cargo has been security screened at RACSF. The security screening log and the copies of security screening receipts issued shall be kept for inspection by CAD. The security status code "SPX" will still be used for the cargo screened at the RACSF, which can be transported on board all aircraft, be it passenger aircraft or all-cargo aircraft.

RACSF operators / Regulated agents shall apply secure transportation (ST) means to protect the screened cargo until they are handed over to the next regulated agent / RACSF / a cargo terminal operator (CTO). The receiving entity shall check the cargo consignments (including the physical appearance and other information such as security seal no.) to ensure no sign of unlawful interference.

Q18: What are required to be indicated on the RACSF's receipt after its conduct of cargo screening?

A18: In addition to the basic information such as MAWB/HAWB number, gross weight, number of pieces, date and time of screening, RACSF shall indicate on the receipt that (i) the cargo have been "security checked", (ii) the screening method(s) adopted (e.g. "x-ray", "hand search", "ETD"), (iii) the company name of the RACSF (e.g. in company chop), and (iv) the RACSF code as assigned by CAD. The screening receipt is unique to individual RACSF.

Q19: How should we distinguish between screened and unknown cargo for cargo acceptance under RACSF regime?

A19: Similar to the Regulated Agent Regime (RAR), segregation of screened cargo from unknown cargo can be achieved by (i) specially assigning separate storage areas for screened cargo (i.e. "SPX" cargo), and/or (ii) labelling the screened cargo, depending on the operational considerations of individual RACSF operator. In the subsequent cargo acceptance at CTOs or co-loading RAs/RACSFs, documentation (e.g. shipping document / associated pre-declaration) check for the security status of the cargo consignment received from RA with cargo appearance shall be conducted. Further details can be found in RACSF SP and Handling Procedures for RACSF downloadable at CAD website.

[https://www.cad.gov.hk/english/icao2021\\_form.html](https://www.cad.gov.hk/english/icao2021_form.html)

Q20: If cargo has already been security screened at RACSF and securely transported to Cargo Terminal Operator (CTO), does the cargo need to be screened again at CTOs?

A20: As far as Hong Kong's aviation security requirement is concerned, if cargo is security screened at the RACSF and then protected all along the transportation from RACSF to CTOs, the cargo needs not be screened again at the CTOs. However, the RACSF operator shall take note of any more stringent security requirements imposed by aircraft operators / foreign civil aviation authorities.

Q21: What are the items required to be detected through the conduct of air cargo screening?

A21: Security screening under the RACSF regime aims to detect explosives and incendiary devices in air cargo consignment but aircraft operators may initiate other screening at CTOs for other purposes such as safety detection of dangerous goods. On top of meeting the RACSF's security requirements, aircraft operators may opt for additional check on air cargo consignments based on aircraft operators' own safety considerations.

Q22: Is it feasible to use computed tomography (CT) technology to screen air cargo?

A22: The Government recognizes the benefits of new screening technology and is open to consider any feasible options including but not limited to the use of CT. On the other hand, the Airport Authority Hong Kong (AAHK) in conjunction with the CTOs is also looking for feasible technological solutions such as canine screening.

Q23: Where can I find a list of the screening equipment makes and models acceptable to CAD?

A23: There are various makes and models of screening equipment which can achieve the detection requirements. For the makes and models of the screening equipment that can be accepted for use under the Hong Kong Aviation Security Programme (HKASP) to conduct security screening, the RACSF applicant shall submit the details of screening equipment to CAD for assessment.

For the detailed requirements and the list of screening equipment which were accepted-in-principle by CAD, please refer to the following CAD website:

[https://www.cad.gov.hk/english/icao2021\\_xray.html](https://www.cad.gov.hk/english/icao2021_xray.html)



Q24: What licences for the screening equipment should RACSF applicants obtain from the Radiation Board of Hong Kong (RB), and how much time does it take to obtain the licences?

A24: RACSF applicants are required to submit applications for relevant licence(s) under the Radiation Ordinance (Cap 303) to and obtain approval on their applications from the Radiation Board of Hong Kong (RB) for each X-ray screening equipment before CAD's Pre-registration Inspection.

In general, RACSF applicants are required to apply for the 2 RB licences below for each equipment:

- (i) Licence for Possession of an Irradiating Apparatus in Non-functional State, also known as "P1" licence (to be applied before the delivery of the equipment to the RACSF site); and
- (ii) Licence for Possession of an Irradiating Apparatus in Functional State, also known as "P2" licence (to be applied before the operation of the equipment at the RACSF site).

As advised by RB,

- (i) it usually takes 3 weeks to process the application for "P1" licence. Applications can be submitted to RB as early as 3 months before delivery of the screening equipment at the RACSF site.
- (ii) the processing time for application for "P2" licence is approximately 8 weeks. Applications can be submitted to RB after obtaining the "P1" licences and upon knowing the delivery date of the screening equipment.

In view of the processing time by RB, RACSF applicants are thus recommended to liaise closely with the equipment supplier regarding the delivery schedule and apply for the RB licences early. The Pre-registration Inspection by CAD can be conducted only after the above two licences have been obtained from RB.

For more information on the application for RB licences, please contact RB Licensing Office through the following means:-

- Website at <https://www.rbhk.org.hk/eng/index.html>;
- Enquiry telephone number at (852) 3620 3754; or
- E-mail at [enquiry@erls.gov.hk](mailto:enquiry@erls.gov.hk)

*Note: The ones who intend to possess and use the X-ray screening equipment should apply for the RB licences. As such, if the screening equipment at the RACSF is possessed and used by a screening service contractor for conducting the cargo screening, the contractor instead of the RACSF operator should apply for the RB licences.*

Q25: What is the minimum number of security screeners needed for each RACSF?

A25: There is no requirement on the minimum number of security screeners in each RACSF, be them its own employees or the employees of a screening service provider, as long as they have been trained and certified by a Certification Body (CB) acceptable to CAD and will perform screening duties in accordance with the CB's Certification Plan.

## Transportation

Q26: After screening at RACSF, how should air cargo be secured during transportation from RACSF to CTOs in the HKIA?

A26: For the details of the transportation security, the list of methodologies of secure transportation (ST) that are accepted in principle, and the assessment process on new methodologies proposed, please refer to the following CAD website:

[https://www.cad.gov.hk/english/icao2021\\_ts.html](https://www.cad.gov.hk/english/icao2021_ts.html)

Q27: Can secure transportation (ST) of screened cargo from RACSF to CTO be performed by RA?

A27: After the conduct of cargo screening at the RACSF, the RACSF operator may either (i) apply ST means and directly deliver the screened cargo to a CTO at airport; or (ii) apply ST means and pass back the custody of the screened cargo to the RA for delivery to a CTO at airport. The choice between the options (i) and (ii) above is a business arrangement to be agreed between the RACSF operator and the RA involved. Further details are provided in the Handling Procedures for RACSF downloadable at:

[https://www.cad.gov.hk/english/icao2021\\_form.html](https://www.cad.gov.hk/english/icao2021_form.html)

Q28: If an RA / RACSF delivers screened cargo to the CTOs in a truck, how should the truck be sealed for secure transportation?

A28: The cargo lots, instead of the truck itself, shall be separately sealed, wrapped or locked. When a cargo lot is unloaded at a CTO, that particular lot shall be checked to ensure no sign of unlawful interference.

Q29: It is noted that the Secure Transportation (ST) means accepted in principle include – “Box trucks equipped with numbered tamper-evident seals and locks” and “ULD container with metal door and equipped with numbered tamper-evident seals and locks”. Is it a must to apply padlock(s) if my seal(s) can lock the door securely without allowing anyone to tamper the cargo?

A29: Application of a padlock would not be necessary if the numbered tamper-evident seal(s) are strong enough to serve also the function of a lock, to adequately protect and secure the known cargo.

## Warehouse

Q30: What is the minimum premise area required for processing cargo in RACSF?

A30: Premises, such as warehouse, for processing and storage of consignments of air cargo shall be secured and access controlled to prevent and detect unauthorized access such that introduction of explosives and incendiary devices into air cargo consignment can be prevented. The size of cargo processing area is not a factor to be considered for RACSF application as long as the above principle can be complied with.

Q31: Can an RACSF accept cargo consignment from non-RA or unknown consignor?

A31: An RACSF shall only receive cargo from RAs for security screening. An RACSF shall not directly receive cargo from non-RAs or unknown consignors for security screening, unless the RACSF itself is an RA and is eligible to annotate the security status (SPX) of the screened cargoes and its RA code on the shipping documents before tendering the cargo to CTOs / airlines.

Q32: Can an RACSF serve more than one RA?

A32: An RACSF can receive cargo from more than one RA and perform security screening of the cargo received. After security screening, the RACSF shall ensure that the required warehouse operations (such as segregation of screened cargo from unknown cargo) and cargo documentation (such as screening log and receipt) will be in place.

## Training

Q33: Where can we find the training institutes for RACSF training?

A33: An RACSF shall have at least the two Nominated Persons who have successfully completed an RACSF Security Training Programme run by training institutes acceptable to CAD. A list of the training institutes and their contact details can be found at CAD website.

[https://www.cad.gov.hk/english/icao2021\\_training.html](https://www.cad.gov.hk/english/icao2021_training.html)

Interested parties can contact the organizers direct for enrolment.

Q34: Do the staff members of RA who have attended and completed an RAR training programme acceptable to Civil Aviation Department still need to attend another training programme to meet the training requirements of RACSF?

A34: Each RACSF should have at least two Nominated Persons who have successfully completed the RACSF training programmes at the training institutes acceptable to CAD. RAR training cannot be considered equivalent to RACSF training.

Q35: Are training required for my contractors?

A35: All staff members of RACSF and their contractors with access to consignment designated as air cargo shall be required to complete both initial and refresher security awareness training to understand the principles of the air cargo security regime in Hong Kong and requirements for RACSF.

The above security awareness training shall be conducted by one of the NPs who have attended and completed a RACSF training programme run by training institutes acceptable to the CAD, or a trainer with equivalent qualification.

Q36: Who is qualified to be the personnel conducting the Internal Security Awareness Training?

A36: Internal Security Awareness Training shall be conducted by one of the RACSF's Nominated Persons or other trainers stipulated in RACSF Security Programme/ Part II/ Section 7(b). Other trainer should also hold a valid RACSF Training Certificates after the completion of an RACSF training programme.

## Others

Q37: What is the major difference between Regulated Agent (RA) and Regulated Air Cargo Screening Facility (RACSF)?

A37: In comparison, the role of RA is generally about the freight forwarding operations and the handling of related air cargo shipping documentations while the role of RACSF is mainly on the security screening operations. There are in fact similarities between the role of RA and that of RACSF. There will be no restriction for RA to be RACSF. RA can also apply/register as an RACSF.

Q38: What is the liability of RACSF?

A38: In terms of the responsibilities under the aviation security regulatory requirements, namely the Hong Kong Aviation Security Programme (HKASP) drawn up under Chapter 494 of the Hong Kong law, the principals are responsible for the implementation of the relevant aviation security measures and procedures. On top of RA and aircraft operators, RACSF operator and Certification Body (CB) are also included as the principals in the HKASP and both RACSF and CB should be liable for their roles and responsibilities as defined in the HKASP.

The contractual or other relationship between the principals and the agents / the third parties who are performing security operations on behalf of the principals is a matter for the companies concerned. Security screeners, regardless of which companies they are employed, are certified by CB responsible for security screener training and certification and perform security screening on behalf of RACSF. As to the liabilities regarding other laws such as those related to civil claims, CAD may not be in a position to comment. Various businesses may buy insurance as necessary for the purpose of commercial risk management.

Q39: Is a register of RACSF regularly updated and published for industry's reference?

A39: Similar to the practices adopted in RAR, a register of valid RACSF is regularly updated and published by CAD in the following website for industry's reference.

[https://www.cad.gov.hk/english/icao2021\\_regracsf.html](https://www.cad.gov.hk/english/icao2021_regracsf.html)

Q40: Does RACSF meet the aviation security requirements of foreign civil aviation authorities (e.g. US TSA)?

A40: The framework of RACSF in Hong Kong is formulated based on the ICAO's standards and guidance. More stringent security requirements above ICAO's standards could be imposed by foreign civil aviation authorities in accordance with foreign states' own situations.