



Notice to Regulated Air Cargo Screening Facilities 1/2024

Guidelines on Strengthening Compliance with the Regulated Air Cargo Screening Facilities Security Programme

With the collaborative efforts of the air cargo industry partners, the 100% security screening on export air cargo programme has been fully implemented in Hong Kong since 1 July 2021. The Regulated Air Cargo Screening Facility (RACSF) Scheme has generally been operating smoothly, and the Civil Aviation Department (CAD) adopts a risk-based approach on the regulatory oversight on RACSFs to ensure the continuous compliance with the [RACSF Security Programme \(RACSF SP\)](#), [Handling Procedures for RACSF](#) and other relevant requirements. Attention of the RACSFs is drawn to the aspects highlighted hereunder in addition to the reminders recapped in *Notice to RACSFs 1/2022 and 1/2023*.

Common Issues Observed in Inspections

2. Every aspect throughout the supply chain of air cargo, such as the integrity of security screening, secure transportation, personnel security, etc. is crucial to safeguard a secure cargo operation. Some common issues on implementing the requirements of the RACSF SP and the Handling Procedures for RACSF, particularly on the cargo security operations and proper format and contents of documentation, are identified and summarised below for the RACSFs' attention:

- (i) Retention of records of security integrity of cargo consignments;
- (ii) Application of Secure Transportation (ST) means;
- (iii) Re-screening of unknown cargo / rejected cargo;
- (iv) Using qualified screening equipment for screening;
- (v) Submission of Notification of Change of RACSF SP and Voluntary Termination of RACSF Status;
- (vi) Handling of suspected restricted items; and
- (vii) Keeping of documentation with appropriate format and contents

3. The observations and relevant requirements, together with the recommended practice(s) to ensure the compliance, are summarised in **Attachment 1** to this notice. RACSFs are reminded to go through them in detail and strongly urged to adopt the recommended practice(s). **Failure to comply with the requirements of the RACSF SP and/or the Handling Procedures for RACSF may lead to suspension or deregistration of the company's RACSF status.**

Follow-up on Deficiency Findings

4. Pursuant to *Notice to RACSFs 4/2021*, whenever an RACSF is required by the CAD to submit a Corrective Action Plan (CAP), the RACSF should address the root cause(s) leading to the deficiencies by feasible and effective corrective measures. The common issues observed in the submission of CAP includes:

- (i) failing to investigate thoroughly to identify the root cause(s) of the deficiencies;
- (ii) failing to elaborate with the details of the corrective action proposed, e.g. by whom to execute the corrective actions, the enhancements in the procedures, the documentation for the implementation of the enhanced procedures);
- (iii) failing to propose the corrective actions addressing the root cause(s) of the deficiencies;
- (iv) incorrectly putting the corrective actions under “Action Party”, which should be provided with the posts and/or persons to implement the corrective actions;
- (v) failing to provide a practical implementation time-line for the corrective actions proposed.

5. Wherever there is doubt, RACSFs could consult and/or clarify with the CAD on their proposed corrective actions before submitting the CAP. RACSFs are required to **timely submit** a CAP detailing the remedial measures to avoid recurrence of the deficiencies identified. **Failure to submit a CAP to CAD’s satisfaction within a reasonable timeframe determined by CAD may constitute a major deficiency and lead to suspension of RACSF status according to the established handling mechanism.**

Reporting of Non-compliance

6. To uphold aviation security and safety which is the basis for sustainable business environment, each stakeholder in the air cargo industry is responsible to exercise due diligence in carrying out their roles in order to ensure a robust and secure supply chain for air cargo. Everyone in the air cargo industry is obliged to actively prevent or combat any malpractices and irregularities which may give rise to any concerns about air cargo security, and has a duty to report them to the concerned person or party. For this purpose, any suspected non-compliance with the Regulated Agent Security Programme and/or RACSF SP or any other issues of aviation security concerns can be reported to the CAD via the following means: -

- (i) by email to racsf@cad.gov.hk; or
- (ii) by post to Level 5, Office Building, Civil Aviation Department Headquarters, 1 Tung Fai Road, Hong Kong International Airport, Lantau, Hong Kong SAR.

7. The following information is suggested to be included in the report to enable follow-up action:

- Name and code of the RA/RACSF with suspected non-compliance;
- Capacity of the person who makes the report (e.g. RACSF’s staff or contractor’s staff)
- Subject of the non-compliance (e.g. warehouse security, security screening, cargo processing, transportation security);

- Details (with date, time and location) of the non-compliance;
- Details of the related consignments (e.g. MAWB/HAWB Number, Screening Date/Time, Departure Date/Time from the RACSF, Flight Number, Flight Date, Air Carrier, Destination);
- Supporting Photos / Images / Documents showing the non-compliance; and
- Contacts of the persons who reports the non-compliance (e.g. Name, Contact Number / Email)

[Note: All information will be kept strictly confidential and used by the CAD only for follow-up on the report.]

Enquiries

8. For enquiries about this notice, please contact the CAD at 2910 8695, 2910 8696 and 2910 8697 during office hours (09:00 – 12:00; 14:00 – 17:00) daily, except Saturday, Sunday and public holidays.

[Note: RACSFs can access the *RACSF SP* and *Handling Procedures for RACSF* in full via the links provided in the notice.]

30 August 2024
Aviation Security Section
Airport Standards Division
Civil Aviation Department

Reminders to Regulated Air Cargo Screening Facilities (RACSFs) about Common Non-Compliance with Regulated Air Cargo Screening Facilities Security Programme (RACSF SP) Observed and the Recommended Practices

Implementation of Cargo Security Operations

1. Retention of Records of Security Integrity of Cargo Consignments

1.1 Some RACSFs were observed to have not maintained CCTV records and X-ray images of screened cargo for a period as stipulated in the *RACSF SP* and the *Handling Procedures for RACSF*. RACSFs are strongly encouraged to **devise regular checking and counter-checking mechanisms** to ensure the functionality and the recording and storage capacity of both CCTV surveillance system and X-ray screening equipment are capable to meet the RACSF requirements continuously. RACSFs are reminded that the following records of security integrity of cargo consignments shall be maintained, where applicable, for every consignment of air cargo for a period of at least **31 days** after screening is conducted:

- (i) CCTV records
- (ii) Register of security seals used for tendering known cargo
- (iii) Pre-declaration for tendering known cargo to other RA / RACSF
- (iv) X-ray images or recordings of screened cargo
- (v) Photo records for hand search / physical check conducted at piece level
- (vi) Analysis results of Explosive Trace Detection (ETD) screening conducted

1.2 For the secondary screening conducted using hand search / physical check at piece level, some RACSFs were observed to have not maintained photo records as required. According to the *Handling Procedures for RACSF, Part A Section 2.5(b)(v)*, **RACSFs shall maintain photo records for hand search / physical check at piece level conducted for each piece** with at least one photo showing the exterior of the box with the cargo label clearly shown (if any), and at least one photo showing the interior of the box and the searched commodities to support the screening results as recorded in the corresponding documentation.

2. Application of Secure Transportation (ST) means

2.1 Some RACSFs were observed to have not properly affixed the tamper-evident security seals on the box truck before transporting screened cargo to the next entity. RACSFs shall comply with the requirements in *RACSF SP Part II Section 11.2* and the *Handling Procedures for RACSF* and apply ST means accepted by the CAD to protect the screened cargo from unlawful interference during transportation to the receiving Regulated Agent (RA) / RACSF / Cargo Terminal Operator

(CTO). RACSFs are encouraged to **clearly assign the responsibility of applying seals and verifying such application to designated staff members**, and properly retain the evidence of applying seals, for example, by **applying the seals under full CCTV surveillance and keeping separate photo records of seal application**.

2.2 RACSFs are reminded that **failure to implement effective security measures to prevent unlawful interference or ensure tamper-evident of screened cargo, including not using ST means accepted by the CAD when transporting screened cargo, is considered as a major deficiency, which may result in suspension or de-registration of the RACSF status.**

3. Re-screening of Unknown Cargo / Rejected Cargo

3.1 The handling of screened cargo shall strictly follow ICAO's principle of supply chain security. When such cargo is in RACSFs' custody (on behalf of Regulated Agents (RAs)), RACSFs shall protect it from unlawful interference at all times, and shall segregate it from unknown cargo handled by the RACSFs. **Cargo which:**

- (a) has been passed out of the custody of an RACSF / RA / CTO;**
- (b) has not been protected using CAD's accepted ST means before leaving the RACSF and along the transportation journey before cargo is accepted by the next entity;**
or
- (c) has been rejected by the receiving RACSF / RA / CTO due to broken ST means;**

shall be treated as unknown cargo and shall be re-screened and protected by ST means before leaving the RACSF for re-tendering.

3.2 RACSFs are highly recommended to highlight the importance of re-screening unknown cargo under the above circumstances to the staff, and remind the staff to seek the directives of Nominated Persons for Cargo Security in case of doubts.

4. Using Qualified Screening Equipment for Screening

4.1 For notification of change of RACSF SP that involves relocation of the RACSF site, RACSFs shall ensure that the screening equipment conforms to the stated requirements under the *RACSF SP Part II Section 10.1* and that all licensing requirements are satisfied, **prior** to bringing it into operations. Where an X-ray source is employed, RACSFs shall ensure a **valid licence / approval from the Radiation Board of Hong Kong** for each individual equipment shall be in place. RACSF shall also maintain detailed records of regular operational calibration check results together with records of maintenance work carried out on the security screening equipment for at least two years.

4.2 RACSFs are reminded that **they shall only perform RACSF operations at the relocated addresses only after the receipt of the CAD's acceptance letter in respect to the relocation**, which is subject to the submission of all supporting documents from the concerned RACSF and the satisfactory result of an inspection for the relocated site.

5. Notification of Change of RACSF SP and Voluntary Termination of RACSF Status

5.1 Some RACSFs were observed to have not timely notified the CAD of any intended changes to the RACSF SP or termination of their operation. To ensure the actual operation complies with the RACSF SP at all time, RACSFs are reminded to inform the CAD in writing **at least 14 working days** before the effective date of any change(s) to the information contained in the *RACSF SP*, and **at least 5 working days** before the effective date of the proposed termination of RACSF status. The forms "*Notification of Change of RACSF SP*" and "*Notification of Voluntary Termination*" are available at the CAD website:

https://www.cad.gov.hk/english/icao2021_form.html

6. Handling of Suspected Restricted Items

6.1 In accordance with the *Handling Procedures for RACSF Part A Para. 2.6.2.9*, **if a security screener detects anomalies or is uncertain about the nature of the items displayed in an x-ray image** during screening, screeners should **report to the supervisor / responsible staff member of the RACSF for their checking against the cargo description on the shipping documents** available at the time (e.g. under the field "nature and quantity of goods" on Shipper's Letter of Instruction (SLI) or House Air Waybill (HAWB)) **and any other supplementary documents** to ascertain whether there is any anomaly. Should there be any doubts, it is advisable for the supervisor / responsible staff member of the RACSF to **contact the Regulated Agent (RA) for clarifications, and request the RA's consent for an open-box check if needed.**

6.2 As cluttered X-ray images may affect the screeners in conducting an effective assessment and detecting suspect items, RACSFs should **avoid placing multiple stacks of consolidated cargo all together through the X-ray screening equipment.** RACSFs are also reminded to **observe other requirements relating to the possession of restricted items (e.g. firearms and ammunition) in Hong Kong.** In case a consignment is suspected to contain any arms or ammunition or any article having the appearance of being a firearm, RACSFs should report to the Hong Kong Police for further investigation and follow-up. It is also prudent for the concerned RACSF to **document the handling of such items** beyond the overall screening results so as to maintain clear and proper record of all handling processes while the items are under the custody of the RACSF.

Format and Contents of Documentation

7. Security Screening Records

7.1 Some RACSFs **were observed to have not included all required information in their security screening logs and receipts, or record consistent information** on these two documents. For instances, the weight of the screened cargo or the screening method(s) adopted for secondary screening was not indicated, or the screening time or the overall screening result recorded were different between the screening logs and receipts. The RACSFs are reminded that the screening date/time on the screening logs and receipts refer to **the time and date when the security screening is conducted**, and shall not be interpreted in any case as any other date/time such as the flight date/time. The overall screening result, be it pass or fail, or whether or not supporting documents are provided, shall be accurate and aligned. RACSFs shall maintain the screening logs for all security screening conducted and issue screening receipts as proof of security screening to the client RAs. The format and contents of such logs and receipts shall be in accordance with the *RACSF SP Part II Section 8.3(d) and (e)*. It is the responsibility of RACSFs to ensure the accuracy of the information presented in the security screening logs and receipts.

8. Records of Secure Transportation

8.1 Some RACSFs were observed to have not properly documented the information of secure transportation. In some cases, the time of departure from the RASCF and the destination to which CTO / RA / RACSF were inaccurate or even not specified in the **registers of security seals used for tendering known cargo**. When the screened cargo was securely transported to other RA / RACSF for further consolidation, the time of dispatch and vehicle licence plate number were inaccurate or sometimes missing in the **pre-declarations for tendering known cargo to other RA / RACSF**. Failing to record the details properly will result in the inability of RACSF to provide sufficient information to support investigation in case of any aviation security issue. RACSFs are reminded to properly record the complete and accurate information in the aforementioned registers and pre-declaration documents as stipulated in the *Handling Procedures for RACSF*.

9. Job Application Form Templates

9.1 The requirement on recurrent background check on existing staff members has been incorporated in *RACSF SP Part II Section 6*, and RACSFs are required to include the corresponding requirement in accordance with *RACSF SP Part II Section 6(a)(iii)* in the template of the job application form. Some RACSFs were observed to have **not updated their job application form templates accordingly** as a result of which the RACSFs may not be able to obtain the necessary information to review the suitability to engage the job applicants to handle air cargo in accordance with the RACSF SP. RACSFs are reminded to ensure the instructions and declarations required in

RACSF SP Part II Section 6(a)(i) to (vi), particularly *6(a)(iii)*, where the job applicants shall agree to provide as soon as reasonably any updates to the education and employment history and criminal conviction record, and to provide such information to the company when required for the purpose of conducting recurrent background check, for the company's assessment on continuation of discharge of work duties.

10. Records of Regular Self-assessment

10.1 RACSFs are reminded to conduct self-assessment **at least once every two years** and **maintain the record for two years** for inspections by the CAD as required by *RACSF SP Part II Section 14(a)*. The self-assessment checklist assists RACSFs in identifying any internal deficiencies or security procedures that are not being properly implemented or that may require enhancement with respect to the RACSF requirements. It is the responsibility of the RACSFs to **complete the self-assessment with due effort based on the actual circumstances and practices** to best reflect the compliance with *RACSF SP, Handling Procedures for RACSF*, notices and any other directions given from time to time by CAD. Failing to do so will lead to delay in identifying and rectifying problems which could lead to a deficiency. The template of the self-assessment checklist is available at the CAD website:

https://www.cad.gov.hk/english/icao2021_form.html