



Notice to Regulated Air Cargo Screening Facilities 1/2025

Guidelines on Strengthening Compliance with the Regulated Air Cargo Screening Facilities Security Programme and Awareness on Improvised Incendiary Devices

Ensuring air cargo security and safety is essential to maintaining the viability, sustainability, and continued success of Hong Kong's air cargo industry. Every aspect throughout the supply chain of air cargo, such as the integrity of security screening, secure transportation, and personnel security, is crucial for safeguarding air cargo security operations. The most common issues on implementing the requirements of the [RACSF Security Programme](#) (RACSF SP) and the [Handling Procedures for RACSF](#), particularly on air cargo security operations and proper documentation, are identified and summarised below for RACSFs' attention:

- (i) Adherence to security screening requirements;
- (ii) Reporting of restricted items / prohibited articles;
- (iii) CCTV surveillance on cargo security operations;
- (iv) Application of secure transportation (ST) means;
- (v) Submission and implementation of corrective action plan (CAP); and
- (vi) Keeping comprehensive documentation in the appropriate format.

2. In the interest of the Person-in-Charge (PIC) and Nominated Persons (NPs) for air cargo security of each RACSF, they are urged to review the relevant requirements for ensuring compliance, the common deficiencies observed and the recommended practices detailed in **Attachment 1** to this notice, and adopt the recommended practices. **Failure to comply with the requirements of the RACSF SP and/or the Handling Procedures for RACSF may lead to suspension or de-registration of the company's RACSF status.**

Awareness on Improvised Incendiary Devices

3. In light of recent global incidents involving Improvised Incendiary Devices (IIDs) targeting air cargo and supply chain, **Attachment 2** outlines vigilance measures to mitigate this emerging threat. The PIC and NPs of RACSFs are reminded that understanding and addressing the potential threat posed by IIDs are also vital for safeguarding air cargo security operations.

Reporting of Non-compliance

4. As mentioned in the *Notice to RACSFs 1/2024*, 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. Therefore, any suspected non-compliance with the Regulated Agent Regime (RAR) and/or RACSF scheme or any other issues of aviation security concerns should be reported to the CAD via the following means: -

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

5. 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

6. 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.]

April 2025
Aviation Security Section
Airport Standards Division
Civil Aviation Department

Reminders to Regulated Air Cargo Screening Facilities (RACSFs) – Common Non-Compliance Observed and Recommended Practices

Implementation of Air Cargo Security Operations

1. Adherence to Security Screening Requirements

1.1 RACSFs are responsible for the performance of security screeners and screening equipment in accordance with *RACSF SP Part II Sections 9 - 10* to ensure air cargo is screened to a standard reasonably sufficient to detect explosives and incendiary devices, and for **handling any anomalies or uncertainties detected by a security screener about the nature of the items displayed in an x-ray image during screening** in accordance with the *Handling Procedures for RACSF Part A Para. 2.6.2.9*. Notably, there have been reported cases where RACSFs **did not identify or did not properly handle consignments which were suspected to contain misdeclared or undeclared restricted items or prohibited articles**.

1.2 To uphold the security standards of RACSFs, the Person-in-Charge (PIC) and/or Nominated Persons (NPs) for air cargo security of RACSFs are strongly recommended to carry out the following quality assurance activities on security screening:-

- (a) to continuously monitor the performance of both the security screeners and screening equipment by regularly **reviewing the screening results against the descriptions of cargo provided in the shipping document(s) by the relevant RA(s), such as Master Air Waybills (MAWBs), House Air Waybills (HAWBs) or Shippers' Letters of Instructions (SLI) and carrying out preventive maintenance checks on x-ray equipment;**
- (b) in case of any **doubt or concern on the performance or competency of a security screener** during regular review of the screening results and/or while investigating any occurrences, to **suspend the duties of the concerned security screener until he/she has completed the refresher training;**
- (c) to ensure any **security screener who is being arranged to conduct security screening on ad hoc basis is duly certified prior to performance of security screening duties;**
- (d) to **reiterate clearly to the security screeners and responsible staff that cargo which cannot be cleared by the security screener through the screening process shall be rejected, and shall not be regarded as screened (SPX) cargo or assigned a SPX status; and**
- (e) to **avoid stacking of consolidated cargo through the x-ray screening equipment to ensure an effective assessment and detection of items of concern during security screening.**

2. Reporting of Restricted Items / Prohibited Articles

2.1 RACSFs are also reminded to **adhere to the legal requirements governing the possession**

of restricted items or prohibited articles (e.g. firearms and ammunition) in Hong Kong. In case a consignment is suspected to contain any misdeclared or undeclared restricted items or prohibited articles during cargo acceptance, screening or processing by the RACSF, the PIC or NPs of RACSF should promptly report the matter to the relevant authorities for further investigation and follow-up. Below is a non-exhaustive list of authorities for reporting specific items:-

Restricted Items / Prohibited Articles	Corresponding Legislation in Hong Kong	Authority to Report to
Firearms or ammunition	Firearms and Ammunition Ordinance (Cap. 238)	Hong Kong Police Force
Dangerous goods	Dangerous Goods Ordinance (Cap. 295)	Fire Services Department Tel no.: 3850 8482 (Dangerous Goods Enforcement Division)
Mercury	Mercury Control Ordinance (Cap. 640)	Environmental Protection Department Tel no.: 2838 3111

2.2 To protect the interest of the concerned RACSF and to facilitate investigation, it is advisable for them to **document the handling of such items** apart from the overall screening results to maintain a clear and proper record of all handling processes while the items are under the custody of the RACSF.

3. *CCTV Surveillance on Cargo Security Operations*

3.1 There were observations that the **time stamp of the CCTV system was inaccurate** when cross-checking with the x-ray images, and **the CCTV cameras were tilted**, which impaired the overall CCTV surveillance.

3.2 The PIC and NPs of RACSFs are reminded to ensure that CCTV surveillance is properly maintained in accordance with *RACSF SP Part II Sections 5.1 (a) and 8.4 (b)*. To ensure continuous monitoring of cargo security operation and avoid confusion during inspections and/or investigations, the PIC and NPs of RACSF should **conduct regular checks on the CCTV system and timely follow-up on any issues identified**. Also, the PIC and NPs of RACSFs should properly **retain the records of the regular checks conducted and any follow-up actions taken** for the CAD's inspection upon request.

4. *Application of Secure Transportation (ST) means*

4.1 There were RACSFs which did not properly lock their box trucks with tamper-evident security seals before transporting screened cargo to the next entity. It is the responsibility of the PIC and NPs of RACSF to ensure the compliance with the requirements in *RACSF SP Part II Section 11.2* and the *Handling Procedures for RACSF* on the application of ST means accepted by the CAD to protect the screened cargo from unlawful interference during transportation to the receiving RA / RACSF / Cargo Terminal Operator (CTO).

4.2 The PIC and NPs of RACSF are encouraged to **clearly assign the responsibility of applying seals and verifying such application to designated staff**, 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**. To ensure the effectiveness of using tamper-evident security seals, every seal should have a **unique serial number**, and the PIC and NPs of RACSFs should **restrict access to the seals** to authorised personnel only.

4.3 RACSFs are reminded that **failure to implement effective security measures to prevent unlawful interference or ensure tamper-evident protection 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 company's RACSF status.**

5. *Submission of Corrective Action Plan (CAP) and Implementation of Accepted CAP*

5.1. Common issues observed in the submission of Corrective Action Plan (CAP) have been mentioned in the *Notice to RACSFs 1/2024*. Wherever there is doubt, the PIC or NPs of RACSF should consult and/or clarify with the CAD on their proposed corrective actions before submitting the CAP. The PIC or NPs of 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 the CAD's satisfaction within a reasonable timeframe determined by the CAD may constitute a major deficiency and lead to suspension of the RACSF status according to the established handling mechanism.**

5.2 The RACSFs are obliged to **strictly and timely implement the CAP once it is accepted by the CAD to prevent recurrence of deficiencies identified in the CAP**. All PIC and NPs of RACSFs are reminded that **failing to implement a previous CAP is a major deficiency** which would be handled in accordance with the deficiency handling mechanism laid down in *Notice to RACSFs 4/2021*. To reduce the chance of committing a major deficiency, the PIC and NPs of RACSFs are recommended to **conduct random checks to ensure the measures proposed in the CAP which have been accepted by the CAD are duly implemented and in place, and properly maintain the checking records for the CAD's inspection upon request.**

Format and Contents of Documentation

6. *Records of Secure Transportation*

6.1 Some RACSFs **did not properly document the information of secure transportation in the registers of security seals used for tendering known cargo**. Examples of incomplete information include:-

- (a) inaccurate or missing time of departure from the RACSF, the destination (i.e. to which CTO / RA / RACSF), and/or vehicle license plate number;
- (b) inaccurate serial numbers of security seals used for tendering known cargo to CTO /

- RA / RACSF; and
- (c) missing records of dispatch of screened cargo to another RA / RACSF on the register.

6.2 It is the responsibility of the PIC and NPs of RACSFs to properly record the details to provide sufficient information for investigation in case of any aviation security issue. The PIC and NPs of RACSFs, therefore, should require their staff members to **properly record complete and accurate information** in the aforementioned registers and pre-declaration documents, as stipulated in the *Handling Procedures for RACSF*.

7. *Security Screening Records*

7.1 Some RACSFs **did not include all required information in their security screening logs and screening receipts, or did not ensure information recorded were consistent** between these two documents. Example of discrepancies include:

- (a) the weight of the screened cargo and/or the screening method(s) adopted for secondary screening were not indicated;
- (b) the screening time and/or the overall screening result recorded were different between the screening logs and receipts;
- (c) consignments which did not pass the security screening and/or were returned to the client RA(s) were not reflected in the screening logs;
- (d) the information in the electronic screening records was different from that in the handwritten records; and
- (e) the names of the client RA(s) that tendered the consignments for screening were not reflected in the screening logs and screening receipts.

7.2 It is the responsibility of RACSFs to ensure the accuracy of the information in the security screening logs and screening receipts. The PIC and NPs of RACSF are reminded that the screening date/time in the screening logs and screening receipts refers to **the time and date when the security screening is conducted** and should not be interpreted as any other date/time, such as the flight date/time.

7.3 There were cases where the discrepancy in screening records arose from an inaccurate time stamp of the screening equipment. Therefore, the PIC and NPs of RACSF are recommended to **conduct regular checks on the system clock/time of the screening equipment** to avoid confusion.

7.4 The overall screening result, be it pass or fail, or whether or not supporting documents are provided, shall be accurate and consistent. RACSFs shall maintain the screening logs for all security screenings conducted and issue screening receipts as proof of security screening to the client RA(s). The format and contents of the screening logs and screening receipts shall be in accordance with the *RACSF SP Part II Section 8.3(d) and (e)*. The PIC and NPs of RACSFs shall **ensure that the acceptance checks, as required under the RACSF SP Part II Section 8.2(b), are properly conducted** to confirm the weight of the consignment and compile the screening records accordingly, rather than waiting for the information provided by a third party (e.g. CTO).

Reminders to Regulated Air Cargo Screening Facilities (RACSFs) – Strengthening Awareness on Improvised Incendiary Devices

1. In 2024, there were two events in Europe involving Improvised Incendiary Devices (IIDs) targeting air cargo and supply chain operations with the intent to cause disruption and destruction. Unlike an Improvised Explosive Device (IED) which is designed to explode, an IID contains an incendiary substance that is capable of catching fire, causing fire or burning readily. **The Person-in-Charge (PIC) and Nominated Persons (NPs) for air cargo security of RACSFs should be aware of the potential threat posed by IIDs to aviation and remain vigilant, for example in the following aspects, during the acceptance, processing and screening of air cargo consignments.**

- (a) **Cargo Acceptance** - While it is clearly stated in the *Handling Procedures for RACSF Part A Para. 2.2* that **an RACSF shall only receive cargo from RAs**, RACSFs should pay special attention to **consignments received from RAs that the RACSFs rarely have any business with**, and prohibit untraceable payment methods (such as cash transactions) or suspicious payment methods in order to ensure the details of payment are recorded and traceable.
- (b) **Additional Screening** – For consignments received from RAs described in (a), the PIC and NPs of RACSFs should consider applying additional screening if:
 - during an alarm resolution process, it becomes obvious that the consignment contents do not broadly match the declared goods description; or
 - it is determined that the consignment contains components such as batteries, wires, Liquids, Aerosols and Gels (LAGs), that are packed in the same package or parcel as electrical devices¹.
- (c) **Security Awareness Training** – The PIC and NPs of RACSFs should include the enhanced security measures and the nature of IID threat during the internal security awareness training to all staff (including contractors' staff) with access to consignment designated as air cargo and/or related shipping documents.
- (d) **Secure Supply Chain** – The PIC and NPs of RACSFs shall ensure the requirements laid down in the RACSF SP, including but not limited to warehouse security, segregation of screened (SPX) and unscreened (UNK) cargo, and transportation security, are fully implemented.

2. The International Air Transportation Association (IATA) has published a guidance material on IIDs, which summarised the enhanced measures that the air cargo industry may consider to implement. IATA's guidance material can be found in the following website:-

https://www.iata.org/contentassets/538b4a1ea4e74990842cf2a752e1d2aa/iid_guidance.pdf

¹ Items that, by inherent design or construct, integrate components such as batteries, wires and/or LAGs and electrical componentry may be exempted.