

Notice to Regulated Air Cargo Screening Facilities 3/2020

Common Issues Observed in Phase 2 of Transition Period for ICAO New Policy Direction and the Latest Developments

This notice serves to advise all Regulated Air Cargo Screening Facilities (RACSFs) about the common issues observed in Phase 2 of the Transitional Arrangement for the International Civil Aviation Organisation's (ICAO) New Policy Direction on Air Cargo Security, and the alternative screening methods for air cargo which are difficult or cannot be screened by x-ray equipment.

Non-compliance of Secure Transportation during Phase 2 of the Transition Period

Background

2. As required by the CAD, cargo screened by a Regulated Air Cargo Screening Facility (RACSF) shall be protected from unlawful interference using one of the Secure Transportation (ST) means accepted by the CAD until it is accepted by a Cargo Terminal Operator (CTO). When applying the ST means, RAs and RACSFs shall strictly follow the application procedures of ST means accepted by the CAD. The following paragraphs set out some non-compliances in the application of ST means as observed during Transition Phase 2.

Use of components not accepted by the CAD on tamper-evident wrapping nets

3. The CAD observed that a small number of RAs or RACSFs have used components (e.g. security seals) not accepted by the CAD on tamper-evident wrapping nets used to protect screened cargo before tendering them to CTOs. RAs and RACSFs are strongly reminded to use only the components provided by respective ST vendors on the tamper-evident wrapping nets, as these components are part of the ST means which have been assessed and accepted by the CAD. Using components not accepted by the CAD, including counterfeit components, is strictly prohibited and would be considered as non-compliance by the CAD, which could lead to suspension or de-registration of the company's RA or RACSF status.

Use of mended tamper-evident wrapping nets

4. In *Notice to RAs 1/2020* and *Notice to RACSFs 1/2020*, RAs and RACSFs were reminded that the act of using *mended tamper-evident wrapping nets* is strictly prohibited by the CAD. Since the issuance of the notices, the CAD still observed that a small number of RAs and RACSFs, despite our reminders, have tendered their screened cargo to CTOs using mended tamper-evident wrapping nets. RAs and RACSFs are, again, strongly reminded that such act is strictly prohibited and would be considered as non-compliance by the CAD, which could lead to suspension or de-registration of the company's RA or RACSF status.

Screening of air cargo which are difficult or cannot be screened by x-ray equipment

Background

5. Noting the industry has reflected that some cargo items are difficult or cannot be screened by x-ray equipment, the CAD has issued guidelines to CTOs and RACSFs on the alternative methods for screening such cargo. The key points of which are extracted below:

Alternative Screening Methods for "Difficult-to-Screen" Cargo

- 6. Under the CAD's air cargo security regime, x-ray screening shall be conducted at CTOs / RACSFs as the primary screening method for air cargo. Yet, for cargo which are difficult or cannot be screened by x-ray equipment, CTOs / 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 CTOs / RACSFs and accepted by the CAD.
- 7. RACSFs are reminded that the above alternative screening methods **shall only be used if the cargo is genuinely not practicable to be screened using x-ray equipment. Their use should be restricted, and should not be used simply for the sake of convenience or due to the value of the cargo.** For detailed guidelines in selecting and applying the above alternative screening methods, please refer to the document *Guidelines for Screening of Air Cargo which are Difficult or Cannot Be Screened by X-ray Equipment*, which is a restricted document distributed to CTOs and RACSFs only. Please contact the CAD if you have not received the document.

Enquiries

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

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