



Notice to Regulated Agents 1/2026

Reminders to Regulated Agents

Regulated Agents (RAs) are subject to regulatory oversight by the Civil Aviation Department (CAD) for the purpose of monitoring compliance with the security requirements stipulated in the [RA Security Programme \(RASP\)](#), the [Handling Procedures for RAR](#), and the notices issued by the CAD from time to time. Apart from informing RAs of recurring issues observed through the issuance of notices, the CAD conducts annual reviews of the deficiencies identified during regulatory oversight.

2. This notice serves to inform RAs of the common deficiencies observed in 2025. It also highlights the importance of (i) verifying authenticity of documentation, (ii) adopting digitalisation in air cargo handling and documentation processes, and (iii) timely reporting of security incident, suspicious activity or non-compliance.

Common General Deficiencies Observed

3. The general deficiencies most commonly observed among RAs during CAD's regulatory oversight in 2025 were related to the following issues. RAs are reminded to ensure compliance in the aspects below :

- (i) conduct of **internal security awareness training** for own and/or contractor staff in accordance with the intended frequency specified in the *RASP*, and/or the proper maintenance of relevant records;
- (ii) renewal and maintenance of **warehouse and/or transportation contractor declarations**;
- (iii) maintenance of templates of **job application form and/or job interview record**;
- (iv) conduct and maintenance of **regular self-assessment** at least once every two years; and
- (v) conduct and maintenance of **recurrent background check** to every staff with access to consignment designated as air cargo and/or its related shipping documents who have been under employment for two years or above.

4. RAs are reminded to fully cooperate with the CAD in all announced and unannounced inspections, including providing access to requested documents and facilities, and facilitating the inspection process in a timely manner.

Major Deficiencies Identified

5. Major deficiencies refer to those which have significant aviation security implications and/or impair the agent's capability as an RA. The following major deficiencies were committed by RAs and identified during CAD's regulatory oversight in 2025:-

- (i) **not having qualified persons** to take up the position of Nominated Persons; and
- (ii) **tendered unknown cargo as known cargo.**

6. RAs involved in major deficiencies were handled in accordance with the mechanism for handling deficiencies promulgated in the prevailing Notice to RAs¹, and were required to submit a Corrective Action Plan proposing effective corrective measures to the satisfaction of the CAD. RAs that repeatedly commit major deficiencies will be **suspended** or **de-registered** in accordance with the mechanism. To ensure continuous compliance, RAs are reminded to regularly review and observe all requirements stipulated in the *RASP*, the *Handling Procedures for RAR*, and the notices issued by the CAD from time to time.

Verification of Authenticity of Documentation

7. In view of the recent concern relating to the use of fraudulent documentation, RAs and applicants for RAs are reminded that it is their obligation to **ensure the veracity of documentation they maintained and submitted to CAD**, with the highest degree of sensitivity and prudence. More specifically, RAs and applicants for RAs shall prevent and detect any deficiencies or irregularities before submission, particularly in relation to the **legality, authenticity, validity and accuracy** of the documentation so compiled and consolidated. The level of quality assurance required should be determined following a risk-based approach.

8. Some practical actions for RAs and applicants for RAs to demonstrate due diligence and conduct documentation verification may include:

- (i) **seeking confirmation of authenticity** directly from the owner/provider of the documentation and/or third-party independent validators, as appropriate; and
- (ii) **maintaining proper documentation and verification evidence** (such as email or other written records), and making such records available to the CAD upon request.

¹ *Notice to RAs 6/2021* was prevailing and applicable until it was superseded by [Notice to RAs 6/2025](#) since 1 January 2026.

9. In addition, during the operational review and continued surveillance processes, CAD may also request verification evidence on the continued validity of the documentation. To rectify any error or omission discovered after submission, applicants shall inform CAD at the earliest opportunity.

10. Failure to provide the requested verification evidence may result in delay or suspension in application handling by CAD, and RA status already issued by CAD may be subject to review or re-assessment, which may lead to **suspension** or **deregistration** of RA status. In case any documentation provided to CAD is suspected to be fraudulent, CAD will not be in a position to process the application/case further and the case may be **referred to the Hong Kong Police Force** for further investigation.

Air Cargo Digitalisation

11. To ensure continuous compliance, **digitalisation** of air cargo handling and documentation processes is one effective way of ensuring integrity and enhancing accuracy of documentation, thereby reinforcing Hong Kong's position as the world's leading international air cargo and aviation hub. A digitalised workflow also **improves visibility** and **tracking** of air cargo status and movement, **reducing manual effort and chances of human error**. RAs and their contractors are encouraged to be open minded in exploring and adopting digital solutions in cargo handling and documentation processes. With available platforms such as the **Port Community System** and the **HKIA Cargo Data Platform**, together with other potential digitalisation solutions, RAs and their contractors are encouraged to seize these opportunities to **replace traditional paper-based processes** to **enhance operational efficiency and timeliness** and **accuracy** of records, while meeting the document retention requirements set out in the *RASP Part II Section 10.4 and 10.5* at the same time.

Reporting of Security Incident, Suspicious Activity or Non-compliance

12. Any security **incident**, **suspicious activity** or **suspected non-compliance** with the Regulated Agent Regime (RAR) and/or Regulated Air Cargo Screening Facility (RACSF) scheme should be reported to the CAD via one the following means:-

- (i) by email to rar@cad.gov.hk or 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

13. The following information should be included in the report to facilitate CAD's follow-up action:

- Name and code of the RA/RACSF concerned;
- Capacity of the reporting person (e.g. RA's own staff, contractor's staff);

- Subject of the incident, suspicion or non-compliance (e.g. warehouse security, security screening, cargo processing, transportation security);
- Details (with date, time and location) of the incident, suspicion or non-compliance;
- Details of related consignments (e.g. MAWB/HAWB number, screening date/time, departure date/time from RACSF, flight number, flight date, air carrier, destination);
- Supporting photos, images or documents; and
- Contact details of the reporting person (e.g. name, phone number, email address).

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

Enquiries

14. For enquiries about this notice, please contact the CAD at 2910 6880 during office hours (09:00 – 12:00; 14:00 – 17:00) daily, except Saturday, Sunday and public holidays.

[Note: RAs can access the *RASP* and *Handling Procedures for RAR* in full via the links provided in the notice.]

April 2026
Aviation Security Section
Airport Standards Division
Civil Aviation Department