



Notice to Regulated Agents 2/2026

Guidance on Addressing the Threat of Improvised Incendiary Devices (IIDs) in Air Cargo

Pursuant to recent initiatives promulgated by the International Civil Aviation Organization (ICAO) to address the **threat of improvised incendiary devices (IIDs) in air cargo**, and in light of global incidents involving IIDs targeting air cargo and supply chain operations, this Notice aims to remind Regulated Agents (RAs) to **remain alert, recognize the importance of addressing IID threats, and reinforce vigilance measures to mitigate this emerging threat**, thereby safeguarding air cargo throughout the secure supply chain.

Guidance on Threats of IIDs in Air Cargo

2. A summary of considerations to support RAs in mitigating risks posed by IIDs is provided in **Attachment 1** to this Notice. RAs should review these considerations and determine the appropriate updates on the current internal awareness training, document review process, and operational responses.

Reporting of Security Incident, Suspicious Activity or Non-compliance

3. 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.

4. 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 the 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

5. For enquiries, 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.

May 2026
Aviation Security Section
Airport Standards Division
Civil Aviation Department

Considerations to Support Regulated Agents (RAs)
in Mitigating the Risks Posed by Improvised Incendiary Devices
in the Air Cargo Supply Chain

The following considerations are derived from international guidance materials relevant to RA operations in addressing the evolving threats posed by Improvised Incendiary Devices (IIDs).

1. Enhanced Awareness and Training for RA Staff

1.1 RAs should ensure that all relevant staff are trained to maintain vigilance with regard to the following:

- a) **Recognizing components of IIDs :**
 - a **power source** to initiate the device (e.g. batteries, capacitors, and power packs);
 - an **initiator**, i.e. ignition mechanism to start combustion (e.g. matchbooks, lighters, electrical circuits, and chemical reactions);
 - a **main charge** (fuel), i.e. flammable substance or accelerant to sustain fire (e.g. flammable liquids, alcohol-based liquids, paint thinner, aerosols, powders or other dangerous goods);
 - a **triggering device**, or **switch**, to control timing or conditions (e.g. timers and phone alarms); and
 - a **container** or **cover** to conceal intent (e.g. boxes and product packaging).
- b) **Recognizing indicators of IIDs:** Identify unusual packaging, signs of tampering, or atypical shipping practices;
- c) **Identifying high-risk cargo combinations:** Remain vigilant in assessing abnormal pairings (e.g. electronics combined with chemicals, gels, or liquids), and distinguishing between tampered and non-tampered items;
- d) **Awareness of high-value targets:** Cargo consigned for transport on commercial aircraft may be considered a more desirable target due to the potential for larger-scale loss of life and significant impact;
- e) **Awareness of cargo origin and content:** Shipments from shippers that the RA rarely conducts business with may present a greater risk. Shipments containing certain combination of items can present additional challenges for detection, especially if originating from areas with elevated threat levels;
- f) **Awareness of packaging diversity:** The wide range of packaging types and formats, including parcels and pallets consignments, increases opportunities for concealment and can hinder effective screening;
- g) **Awareness of accessibility and ease of assembly:** Materials and components used to construct IIDs are often inexpensive and readily available, and their assembly may not require specialized knowledge or expertise; and
- h) **Awareness of detection difficulties:** Innovative and advanced concealment techniques and the limitations of manual and different technology-based screening methods contribute to the overall risk, making it more challenging to identify hidden devices, especially in medium or higher density consignments.

2. Handling of High-Risk Cargo

- 2.1. High-risk cargo is defined as “cargo which is deemed to pose a threat to civil aviation as a result of specific intelligence, or shows anomalies or signs of tampering which give rise to suspicion.” High-risk cargo must be subjected to enhanced security measures to address the associated threat. The treatment of high-risk cargo are stipulated in Part II Section 12 of the [RA Security Programme \(RASP\)](#).
- 2.2. In the context of IIDs, RAs should apply additional scrutiny when the following risk indicators are present:
 - a) **a mismatch between documentation, weight and physical contents**, such as discrepancies between declared commodities and items observed during screening (e.g. documentation lists clothing, but screening reveals electronics);
 - b) **unusual forms of payment**, such as cash and untraceable credit cards;
 - c) **unusual or suspicious combinations of materials within the same shipment**, such as the presence of chemicals, electronics, and industrial goods that, when combined, may raise concern;
 - d) **mis-declared or undeclared dangerous goods** that could pose safety and security risks, especially when concealed, disguised or combined with other items; and
 - e) **unknown or unverified shippers**, especially non-secure supply chain entities, such as individuals and personal shipments (i.e. walk-up customers).

3. Secure Supply Chain

- 3.1 RAs should recognize that the establishment of a secure supply chain is an essential element in mitigating the risks posed by IIDs concealed within air cargo. The [Handling Procedures for RAR](#) provide guidance on secure supply chain frameworks in Hong Kong.
- 3.2 Consignments accepted and subjected to security controls applied by RAs, RACSFs, Cargo Terminal Operators, or other screening operators accepted by the CAD, are considered secured within the supply chain. Together, these entities provide a clear chain of custody and continuity of protection until consignments are delivered to the aircraft operator, forming the backbone of a secure supply chain.

4. Proper Documentation

- 4.1 RAs are reminded to **maintain proper documentation**, including air waybills and, where possible, invoices and shipping manifests, and to check and detect discrepancies, inconsistencies, or other anomalies that may signal elevated risk;
- 4.2 RAs should **ensure that documentation aligns with security controls**, including screening results when screening is applied, with particular attention to mismatches between declared and observed contents (e.g. screening reveals electronics when documentation indicates textiles). Such discrepancies should lead to high-risk cargo designation and be handled correspondingly in accordance with the *RASP*; and
- 4.3 RAs should **ensure that all consignments are properly sealed, labelled, and marked**, as improperly packaged items may indicate concealment attempts.