



## Notice to Regulated Agents 5/2025

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### Ensuring Security Screening on Unknown Cargo

Regulated Agents (RAs) shall only tender cargo which has been cleared by appropriate security screening acceptable to the Civil Aviation Department (CAD) as known cargo. In light of the recent investigation on the major deficiency of tendering unknown cargo as known cargo committed by RAs, this notice serves to remind all Persons-In-Charge (PICs) and Nominated Persons for Cargo Security (NPs) of RAs on the aspects highlighted hereunder to ensure security screening on unknown cargo.

#### Positive Confirmation on Results of Security Screening

2. The investigation revealed that the subject RA, **without confirming the receipt of screening records or results of screening of the consignment, declared it as Known Cargo by:**

- annotating “known cargo” (“SPX”) on the Master Air Waybill (MAWB) submitted to aircraft operator; and/or
- indicating “SPX” in the Form of Undertaking for Inter-Agent Handling (FoU) when the subject RA, being an MAWB assignee, returns the FoU to the MAWB assignor.

**Tendering unknown cargo as known cargo is a major deficiency** under *Notice to RAs 6/2021* (the *Notice*). As the case was associated with an occurrence, escalation was effected in accordance with *the Notice*. As a result, the concerned RA was subjected to **suspension of RA status**.

3. The major deficiency could have been prevented by establishing and ensuring adherence to clear and proper procedures. The PICs and NPs of RAs shall ensure that, when the consignment has been cleared by security screening by the Regulated Air Cargo Screening Facility (RACSF), their **staff checks for a screening receipt issued by the RACSF** (or another form of **written confirmation of screening result for the subject cargo**, such as notification by email or other means in case a screening receipt is not immediately available) **before annotating “SPX” on and submitting the corresponding shipping documents** (e.g. MAWB or co-loading documents) in accordance with Part A Section 2.1.2.1 of the [Handling Procedures for Regulated Agent Regime \(RAR\)](#). To ensure compliance to the relevant requirements, the PICs and NPs of RAs should have established procedures for their staff to **positively confirm that a consignment is cleared by security screening**, and ensured their execution. Screening receipts, together with any written notifications of screening result serving as supportive evidence in case of investigation, shall be retained for record in accordance with Section 10.5 of [Regulated Agent Security Programme](#).

#### Use of RA Status with Due Diligence

4. The case also involved an RA who used its RA code in the relevant shipping documents submitted to CAD. As a result, despite the consignment was not under its custody, the RA was held responsible for the deficiency. Its RA status was therefore subjected to suspension in the end. The PICs and NPs of RAs are reminded to ensure that their RA codes are only indicated on shipping documents for shipment **under their genuine custody** in all circumstances. **If an RA is found misusing its RA status, e.g. using its RA code on consignments not related to the concerned RA, CAD reserves the right to suspend or remove the RA concerned from CAD's RA register.** For cases with element of **frauds, falsifications or forgery**, they will also be **referred to the Hong Kong Police Force for investigations and follow-up.**

#### Management of User Accounts for Submission of Pre-declaration and/or MAWB

5. It was revealed during the investigation that the user account of an RA which did not tender nor was not involved in inter-RA handling of the subject cargo was used to submit the pre-declaration to Cargo Terminal Operators (CTOs) and/or electronic Air Waybill (eAWB) to airlines. It should be stressed that all documents submitted with the user account is considered as submitted by the RA who owns the account hence the RA shall assume **responsibility for any deficiency arising from non-compliance with the RAR requirements**, such as declaring unknown cargo as known cargo. It is the responsibility of the PICs and NPs of RAs to ensure that the access to the login credentials of the user accounts is restricted to their staff (including RA's own staff and contractor staff) who are authorised to **submit documents to CTOs and/or airlines for the cargo under the RA's custody**, and declare the security status only after positively confirming the security screening's results. RAs should also maintain an updated record of persons and/or entities who are authorised to access the login credentials. The PICs and NPs of RAs are reminded again that they hold the ultimate responsibility for any actions taken by their authorised staff.

6. The CAD will continue to closely monitor the situation, and if need be, further actions will be taken and enhancement measures will be introduced to ensure air cargo security and safety. The CAD looks forward to the continuous collaboration with stakeholders and the air cargo industry in this regard to achieve a secure supply chain and safe transport by air.

#### Enquiries

7. 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.

September 2025

Aviation Security Section  
Airport Standards Division  
Civil Aviation Department