



Briefing on ICAO New Policy Direction on Air Cargo Security and Regulated Air Cargo Screening Facility (RACSF) Scheme

Civil Aviation Department, Hong Kong
13 and 20 September 2018



Content

- ▶ Background: ICAO New Policy Direction's Impacts & Security Measures being Planned
- ▶ Security Requirements and Application Procedure for Regulated Air Cargo Screening Facility (RACSF) Scheme
- ▶ Summary of Role of RAs under New ICAO Policy Direction
- ▶ Planned Transition Period
- ▶ Q & A on the RACSF Scheme and Transition Period



The New ICAO Policy Direction



- ▶ On 1 September 2016, ICAO announced that consignors not approved by Appropriate Authority for aviation security are required to be phased out by **30 June 2021**
- ▶ 3 options for consignors:
 - ▶ 100% security screening of air cargo
 - ▶ Validated as known consignors (KCs)
 - ▶ Approved as other entities applying security controls



Impacts to Hong Kong

- ▶ Fundamental changes to existing air cargo security regime in HK
 - Security supply chain : Validation of consignors by government
 - Expansion of air cargo security screening capacity
 - Cargo Terminal Operators (CTOs)
 - Regulated Air Cargo Screening Facilities (RACSFs)
 - New technologies for air cargo security screening



Validation of Consignors as KCs

- ▶ Validation of KCs by Government (instead of recognition of KCs by RAs)
- ▶ Associated issues under study by Government
 - No. & geographical distribution of consignors & cargo agents
 - On-site regulatory oversight: jurisdiction & resources
 - Origins of cargo flow: production & assembling
 - Validation of consignors within & outside HK
- ▶ A validation scheme for **local KCs** originating cargo (those involving in production & assembling) is being formulated. Target to roll out in **Q1 2019**



Progressive Buildup of Air Cargo Security Screening Capacity

- ▶ Evaluate the options to progressively build up x-ray screening capacity
- ▶ On-airport : CTOs
 - Design and spatial constraints of CTOs
 - Road traffic consideration on the airport island
- ▶ Off-airport : RACSFs
 - Setting up of RACSFs by RAs, shared warehouse operators or other entities
 - Government's formulation of security requirements for the RACSF regime



Introduction of RACSF Regime

- ▶ **Any entity** (RAs, warehouse operators or any interested entities) which intends to operate off-airport x-ray screening facility for screening air cargo may apply for acceptance by CAD to become a RACSF
- ▶ Registration of RACSF is **site-specific**
 - ▶ If an operator intends to operate screening facilities at more than one off-airport site address, it needs to apply to CAD for acceptance of each of these sites



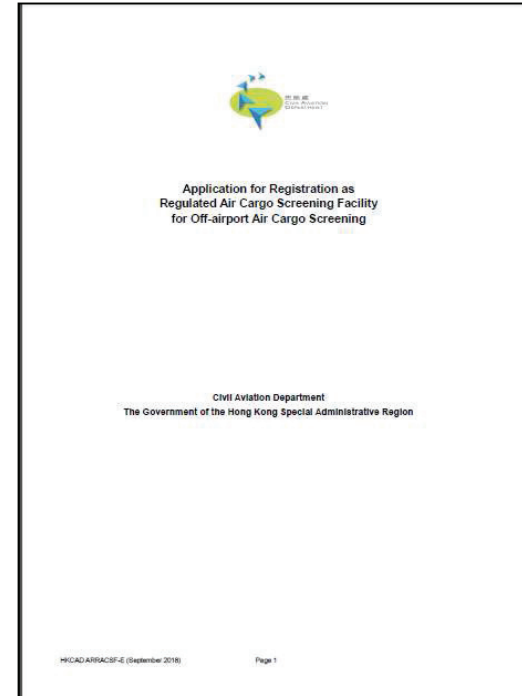
RACSF Applications

- ▶ Submit application together with relevant supporting documents to CAD
 - ▶ Application form downloadable from CAD website (<http://www.cad.gov.hk/english/icao2021.html>)
 - ▶ Commencement date of application: October 2018 (exact date to be announced by CAD)
 - ▶ Please do not submit application form for the time being
- ▶ The application form contains a RACSF Security Programme (SP) detailing relevant security provisions & operations arrangement for ensuring the air cargo security integrity
- ▶ Similar to the existing RA application form which also contains a RASP



RACSF Application Form

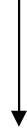
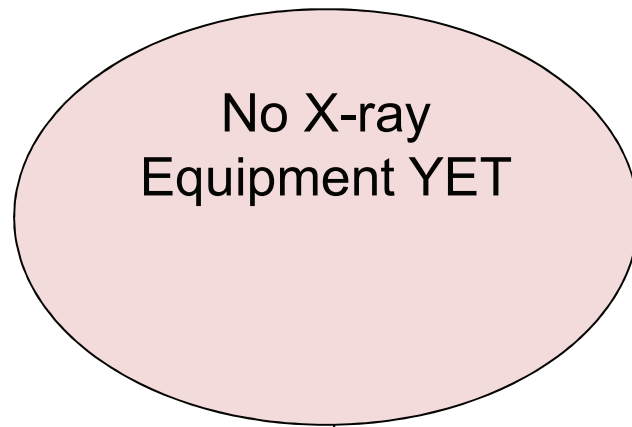
- ▶ **Part I – Application Notes**
 - ▶ 4 – Application Process (Route A and Route B)
- ▶ **Part II – RACSF Security Programme**
 - ▶ 3, 4, 7 – Organisation and Training
 - ▶ 5 – Warehouse Security
 - ▶ 6 – Personnel Security
 - ▶ 8 – Cargo Acceptance, Processing, Screening and Storage
 - ▶ 9 – Security Screeners
 - ▶ 10 – Security Equipment
 - ▶ 11 – Chain of Custody – Secure Transportation
 - ▶ 12 - Documentation
 - ▶ 13 – Treatment of High Risk Cargo
 - ▶ 14 – Self-Assessment and Regulatory Oversight
- ▶ **Part III – Declaration of Compliance**
- ▶ **Part IV – Checklist of Required Documents**



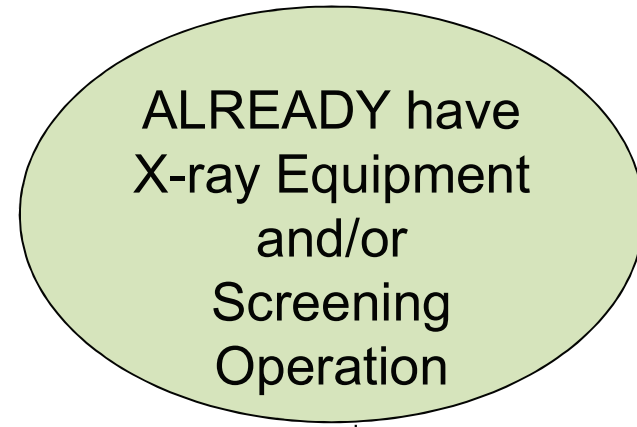
The image shows the cover page of the RACSF Application Form. At the top center is the logo of the Civil Aviation Department of the Hong Kong Special Administrative Region, featuring a stylized blue and green globe with a white aircraft. Below the logo, the text reads: "Application for Registration as Regulated Air Cargo Screening Facility for Off-airport Air Cargo Screening". Further down, in smaller text, it says "Civil Aviation Department" and "The Government of the Hong Kong Special Administrative Region". At the bottom left, there is a small reference code "HKCADARRACSF-E (September 2018)", and at the bottom right, it says "Page 1".

Part I – Application Notes

Application for RACSF – 2 Routes



Route A



Route B



Part I – Application Notes

Application for RACSF – Route A

- ▶ **Step 1:** Obtain technical requirements for X-ray equipment: Written request to CAD at racsf@cad.gov.hk
- ▶ **Step 2:** Submission of application: Submitted completed application form and all required documents except the documentations relating to X-ray equipment, training certificates of the nominated persons (if not available at time of application)
- ▶ **Step 3:** Evaluation of application by CAD
- ▶ **Step 4:** Acceptance-in-principle
- ▶ **Step 5:** Acquiring of X-ray equipment and Engagement of Screeners
- ▶ **Step 6:** Pre-registration inspection
- ▶ **Step 7:** Registration as RACSF



Part I – Application Notes

Application for RACSF – Route B

- ▶ **Step 1:** Obtain technical requirements for X-ray equipment: Written request to CAD at racsf@cad.gov.hk
- ▶ **Step 2:** Submission of application: Submitted completed application form and all required documents except training certificates of the nominated persons (if not available at time of application)
- ▶ **Step 3:** Engagement of screeners
- ▶ **Step 4:** Evaluation of application by CAD
- ▶ **Step 5:** Pre-registration inspection
- ▶ **Step 6:** Registration as RACSF



Part II - RACSF Security Programme

- Section 3, 4, 7 Organization and Training

- ▶ Three key personnel
 - ▶ Person In-Charge (PIC)
 - ▶ Management Personnel of the company (e.g. chief operations officer, director, senior manager)
 - ▶ 2 Nominated Persons for Cargo Security (NP)
 - ▶ Trained persons who have attended & completed a RACSF training programme acceptable to CAD
 - ▶ Training Certificates valid for **3 years**
 - ▶ Copies of **Training Certificates to be submitted to CAD before pre-registration inspection**
- ▶ Other staff members (including contractors) with access to consignment designated as air cargo
 - ▶ required to complete both initial and refresher training on air cargo security conducted by NP or trained persons



Part II - RACSF Security Programme

- Section 5 Warehouse Security

- ▶ Physical protection of premises
 - ▶ Physical barriers such as fences, gates and walls, to protect the premises for processing and storing the consignment against unauthorized access
 - ▶ All access points to the consignments closed, locked or guarded when not in use
 - ▶ Regular inspection on the physical barriers
 - ▶ Personnel doors and vehicle access gates for access control
 - ▶ **Cargo screening area shall be under CCTV surveillance**



Part II - RACSF Security Programme

- Section 5 Warehouse Security

- ▶ Access control of premises
 - ▶ Access to air cargo processing, screening and storage areas shall be restricted to authorized individuals with an operational need by means of identity checks or a permit system
 - ▶ Identity check on persons entering the RACSF, including staff and visitors
 - ▶ Access points are manned by security personnel or monitored by automated devices



Part II - RACSF Security Programme

- Section 6 Personnel Security

▶ Personnel Security

- ▶ Job applicants are required to provide education, employment, and criminal conviction history in the previous 5 years
- ▶ Existing staff members shall also provide the same information
- ▶ Recruitment records of staff members shall be kept for **at least the duration of employment + 1 year.**



Part II - RACSF Security Programme

- Section 8 Cargo Acceptance, Screening, Processing and Storage

- ▶ RACSF shall conduct **documentation** and **appearance check** of the cargoes to be screened
 - ▶ Document shall include MAWB (where applicable) and HAWB / SLI
- ▶ Cargoes shall be screened to a standard sufficient reasonably to **detect explosives and incendiary devices**
 - ▶ By x-ray equipment
 - ▶ If cargoes cannot be cleared, they shall be screened using searching by hand or physical check at piece level
- ▶ Screened cargo shall have “SPX” status



Part II - RACSF Security Programme

- Section 8 Cargo Acceptance, Screening, Processing and Storage

- ▶ Screening Records
 - ▶ Security Screening Log
 - ▶ Maintain a log of all security screening conducted
 - ▶ Kept by RACSF for a minimum of **3 months**
 - ▶ Security Screening Receipt
 - ▶ If RACSF conducts screening for other RAs, they shall issue receipts (similar to RCL issued by CTOs) as proof of security screening
 - ▶ Copies of security screening kept by RACSF for a minimum of **3 months**



Part II - RACSF Security Programme

- Section 8 Cargo Acceptance, Screening, Processing and Storage

- ▶ Segregation of Screened Cargo from Unknown Cargo
 - ▶ Specially assigning separate storage areas (Screened / SPX and/or “UNK” cargo area); and/or
 - ▶ Labelling (e.g. using “Screened / SPX” and/or “UNK” cargo labels)



Part II - RACSF Security Programme

- Section 8 Cargo Acceptance, Screening, Processing and Storage

Protection of Screened Cargo

- ▶ If screened cargoes still have to be consolidated / further processed before loading onto truck, the RACSF shall
 - ▶ provide continuous monitoring of the screened cargoes by personnel; and
 - ▶ supplement by CCTV surveillance & recording
 - ▶ CCTV footage kept for at least **31 days**

- ▶ In the event that CCTV is not feasible, other alternatives may be considered e.g. having the cargoes wrapped in tamper-evident wrapping sheets / covers / nets immediately after consolidation



Part II - RACSF Security Programme

- Section 13 Treatment of High Risk Cargo

- ▶ Cargo presented by an unknown entity, or showing signs of tampering, shall be considered high risk, if, in addition, it meets one of the following criteria
 - ▶ (a) Specific intelligence indicates that the cargo poses a threat to civil aviation; or
 - ▶ (b) The cargo shows anomalies that give rise to suspicion; or
 - ▶ (c) The nature of the cargo is such that baseline security measures alone are unlikely to detect prohibited items that could endanger the aircraft.

Regardless of whether the cargo comes from a known or unknown entity, specific intelligence may render it high risk.

- ▶ RACSF shall screen using two different means of security screening (e.g. x-ray screening and searching by hand or physical check at piece level)



Part II - RACSF Security Programme

- Section 13 Treatment of High Risk Cargo

- ▶ Suspect Cargo
 - ▶ with sign of tampering and / or inconsistency between consignments appearance and shipping documents
 - ▶ further information has to be sought from the regulated agent / consignor to resolve the suspicion
- ▶ Unresolved Suspicions
 - ▶ If there is any unresolved suspicion or sign of danger from the suspect cargo consignments, call the Police for assistance and, if necessary, evacuate and cordon off the premises



Part II - RACSF Security Programme

- Section 13 Treatment of High Risk Cargo

- ▶ Where an explosive or incendiary device has been identified, the case shall also be **reported to the CAD**, and the operator shall screen other air cargo consignments
 - ▶ (i) destined for the same flight or destination
 - ▶ (ii) originating from the same consignor / shipper or location



Part II - RACSF Security Programme

- Section 9 Security Screeners

- ▶ X-ray screeners at a RACSF shall meet the following criteria:
 - ▶ Medical criteria
 - ▶ good general health
 - ▶ good eyesight
 - ▶ normal color perception
 - ▶ hearing capability
 - ▶ capability to detect by smell a range of substances
 - ▶ being free from dependence on alcohol or illegal drugs.
 - ▶ Educational criteria
 - ▶ minimum educational level of Secondary 5 or equivalent
 - ▶ Other criteria
 - ▶ able to communicate in Cantonese



Part II - RACSF Security Programme

- Section 9 Security Screeners

- ▶ Screeners shall be ***trained and certified*** by a Certification Body (CB) before allowed to perform screening duties
 - ▶ If the applicant has not yet engaged a CB at the time of submitting the application, Section 9.3(a) – Name of CB can be left blank.
- ▶ After certification, screeners shall undergo
 - ▶ On-the-job supervised operational attachment by CB
 - ▶ Periodic assessment by CB
- ▶ Screeners shall attend ***refresher training*** and be ***re-certified*** by a CB once every 12 months



Screeners shall possess ***valid evidence of certification*** when carrying out screening duties.

Part II - RACSF Security Programme

- Section 9 Security Screeners

Working Hours

- ▶ Security screeners of air cargo in RACSF shall be restricted to working 8 hours a day in screening air cargo (excluding meal breaks) unless for emergency or under exceptional circumstances.
- ▶ On occasions that the hours of work extended beyond 8 hours a day, the RACSF shall submit a report to the CAD detailing the reason(s) for such extension.



Part II - RACSF Security Programme

- Section 10 Screening Equipment

RACSF shall

- ▶ Ensure screening equipment is used properly, maintained in a safe and serviceable condition
- ▶ Ensure regular operational calibration checks are carried out, and keep these records for at least **2 years** for CAD's inspection
- ▶ Ensure equipment is immediately removed from operational use if there is any evidence to suggest that it is not operating properly, until the RACSF is satisfied that it has been repaired and is fully serviceable



Part II - RACSF Security Programme

- Section 10 Screening Equipment

- ▶ X-ray equipment shall
 - ▶ Meet the technical specifications of CAD which cover requirements on detection capabilities and routine testing
 - ▶ Obtain “Technical Requirements of X-ray Screening Equipment” by sending a written request to CAD at racsf@cad.gov.hk
 - ▶ be licensed and approved for use by the Radiation Board of Hong Kong
- ▶ RACSF shall provide the **make and model** of the proposed x-ray equipment to CAD for assessment



Part II - RACSF Security Programme

- Section 10 Screening Equipment

- ▶ Documents to be submitted under **Route A**:
 - ▶ (a) Together RACSF Application Form:
 - ▶ (1) Technical Specifications;
 - ▶ (2) Proof of certification by other authorities (e.g. TSA, ECAC, DfT); and
 - ▶ (3) Any other useful information.
 - ▶ (b) Before Pre-Registration Inspection:
 - ▶ (4) Operations Manual;
 - ▶ (5) Factory Acceptance Test (FAT) and Site Acceptance Test (SAT) results; and
 - ▶ (6) Licence / Approval from Radiation Board of Hong Kong for each individual equipment.



Part II - RACSF Security Programme

- Section 10 Screening Equipment

- ▶ Documents to be submitted under **Route B**:
 - ▶ Together RACSF Application Form:
 - ▶ (1) Technical Specifications;
 - ▶ (2) Proof of certification by other authorities (e.g. TSA, ECAC, DfT);
 - ▶ (3) Operations Manual;
 - ▶ (4) Factory Acceptance Test (FAT) and Site Acceptance Test (SAT) results;
 - ▶ (5) Licence / Approval from Radiation Board of Hong Kong for each individual equipment; and
 - ▶ (6) Any other useful information.



Part II - RACSF Security Programme

- Section 11 Chain of Custody – Secure Transportation

- ▶ Transportation security arrangement to protect 'screened' cargo carried on trucks for delivery to the HKIA
- ▶ RACSF may provide own secure transportation service.; or may leave to other RAs / RA's transportation contractor to provide such service
- ▶ Before loading of cargo
 - ▶ Search the load compartment of the vehicle
 - ▶ Driver shall present identity card, driving license or other document with a photo for verification



Part II - RACSF Security Programme

- Section 11 Chain of Custody – Secure Transportation

▶ Boxed trucks

- ▶ tamper-evident seals or locks
- ▶ access to such seals / locks controlled
- ▶ numbers for tamper-evident seals properly recorded to ensure traceability

▶ Open trucks (where the cargo is palletized and tamper-evident seals or locks cannot be effectively applied)

- ▶ properly secured by appropriate tamper-evident wrapping sheets / covers / nets through which the integrity of air cargo consignments can be easily detected; **OR**
- ▶ other alternative means/technology applications to protect cargo on open trucks (e.g. real-time monitoring by using CCTV cameras), subject to CAD's assessment



Part II - RACSF Security Programme

- Contractor Declaration Forms (Section 8, 9, 11)

- ▶ Declaration Forms for contractors (if applicable)
 - ▶ Cargo Processing Contractor Declaration
 - ▶ Transportation Contractor Declaration
 - ▶ Screening Service Contractor Declaration
- ▶ RACSF shall maintain the contractor declaration forms for CAD's inspection. Such forms are not required to be submitted to CAD.

Part II - RACSF Security Programme - Section 12 Documentation

	Documents	Periods
1	Certificates of RACSF training organised by training institutes and/or results of revalidation test	As long as the certificates remain valid
2	Records of personnel security	Duration of employment + 1 year
3	Records of internal security awareness training	2 years
4	Security screening log	3 months
5	Copies of security screening receipts issued	3 months



Part II - RACSF Security Programme - Section 12 Documentation

	Documents	Periods
6	Records of screener training and certification	2 years
7	Calibration and maintenance records of security screening equipment	2 years
8	Records of security integrity of cargo (e.g. CCTV, records of security seal)	31 days
9	RACSF Security Programme	As long as the company remains a RACSF
10	Self-assessment records	2 years



Part II - RACSF Security Programme - Section 14 Self-Assessment and Regulatory Oversight

- ▶ Self-Assessment
 - ▶ RACSF shall conduct regular self-assessment with reference to the RACSF SP at least **once every 2 years**
- ▶ Regulatory Oversight by CAD
 - ▶ RACSF shall be subject to announced and unannounced inspection by the CAD
 - ▶ RACSF can be suspended or de-registered by CAD if failed to comply with stipulated requirements.



Part III – Declaration of Compliance

- RACSF declares that it shall comply with the RACSF SP, handling procedures and other circulars issued by CAD from time to time
- To be signed by Person-in-charge of RACSF with company chop

Part III - Declaration

Declaration of Compliance – Regulated Air Cargo Screening Facility
(To be completed and signed by the Person-in-Charge mentioned in Part I Section 3)

I, for and on behalf of _____
(Company Name) (hereafter referred to as "the company") in respect of my Regulated Air Cargo Screening Facility (RACSF) at _____ (Site Address), hereby declare that:-

- (a) To the best of my knowledge, all information contained in this application form (including the RACSF Security Programme (SP) (Part II of this application form)) is true, complete and accurate, and I understand that giving false information or making false statements knowingly and wilfully may be liable to prosecution and de-registration of the company's RACSF status.
- (b) The company will continuously implement the practices and procedures set out in the RACSF SP, handling procedures, notices and any other directions given from time to time by the Civil Aviation Department (CAD), and such practices and procedures are communicated to all staff members with access to consignment of air cargo and/or related documents.
- (c) The RACSF SP will be adjusted to comply with all the relevant changes to the requirements stipulated in handling procedures, notices and any other directions given from time to time by CAD, unless the company informs CAD that it no longer wishes to operate as an RACSF.
- (d) The company will inform CAD in writing as soon as reasonably possible if:-
 - (i) there is any change of the information contained in this application form, including the RACSF SP; and
 - (ii) the company ceases operations, no longer deals with cargo for carriage by air or can no longer meet the requirements of the RACSF, including the requirements in the RACSF SP.
- (e) The company will fully cooperate with CAD in all announced and unannounced inspections and provide access to all documents as requested by CAD during inspections.
- (f) For any deficiencies found in air cargo operations in respect of the RACSF including the requirements in the RACSF SP, the company will take actions to rectify such deficiencies within a time period as specified by CAD.
- (g) The company will inform CAD of any serious breaches of the requirements of the RACSF including the requirements in the RACSF SP, e.g. failure to conduct proper security screening on air cargo as required under this programme, or any attempt to conceal explosives or incendiary devices in the consignments of cargo intended for carriage on aircraft.
- (h) The company will ensure that all relevant staff members with access to consignment designated as air cargo and/or related documents will receive appropriate training and are aware of their responsibilities under the RACSF SP.
- (i) Any failure to comply with the requirements of the RACSF including the requirements in the RACSF SP, including failure to maintain and provide any records as required by the RACSF SP, may result in suspension or de-registration of the company's RACSF status.
- (j) I have read and understood Part I Section 3 – Data Privacy Statement.
- (k) I agree that CAD has no liability to the company and its prospective or existing staff members for the rejection of job application or termination of employment.
- (l) I agree that CAD has the final discretion on all parts of this application form.

Full Name
(in block letters)
(as appeared on HKSAR passport) _____

Position in
Company _____

Signature and
Company Chop _____

Date _____

HKCAD ARRACSF-E (September 2018) Page 28



Part IV – Checklist of Documents to be submitted

- Copy of business registration certificate (BRC)
- Copies of RACSF Training Certificates
- Company organization chart
- Sample of permit (if permit is used to control access)
- Samples of SPX / Screened cargo and UNK Cargo Labels (if used)
- Warehouse floor plan (physical security installations, access control points and security installations, screening areas, segregation of screened/unscreened cargo)
- Supporting documents for the x-ray screening equipment (refer to Part II Section 10 – Security Equipment)



Handling Procedures for RACSF

- ▶ Document being drafted to
 - ▶ Reflect the responsibilities of different entities on the cargo supply chain under the off-airport screening scenarios, such as:
 - ▶ Unknown Consignor – RA – RACSF – CTO / Airline
 - ▶ Unknown Consignor – RA – RACSF – RA – CTO / Airline
- ▶ Contain samples of security screening log and security screening receipt for reference
- ▶ Contain blank forms of cargo processing contractor declaration, transportation contractor declaration and screening contractor declaration
- ▶ Will be uploaded to CAD website prior to roll out of RACSF scheme

Air Cargo Screening: New Technologies

- ▶ Government keeps closely monitoring new developments in technologies, e.g.
 - ▶ Palletised cargo screening equipment (e.g. CT technology)
 - ▶ Uses of canines for cargo screening
 - ▶ Under study by AAHK

Summary of Role of RAs under New ICAO Policy Direction

- ▶ Supply chain security
 - ▶ Receive known cargo from KCs validated by Civil Aviation Department
 - ▶ Validation system being studied by Government
- ▶ Security Screening
 - ▶ Arrange 100% screening of unknown cargoes at
 - CTOs at HKIA
 - Off-airport RACSFs
 - Either apply as RACSFs or
 - Send cargoes for screening at off-airport screening sites (e.g. warehouses, other RAs) with RACSF status

Planned Transition Period

- Under Government current planning, QCP screening percentage of known cargo consigned by existing Known Consignors (KCs) / Account Consignors (ACs) will be **increased progressively by phases from 1% to 100%** before the ICAO new policy comes into force:

Transition Phase	Commencement Date	% of screening of known cargoes by RAs
Roll out of RACSF scheme	Oct 2018	1
Phase 1	Sept 2019 (– Feb 2020)	(20 –) 40
Phase 2	May 2020 (– Jun 2020)	(50 –) 70
Phase 3	Jan 2021 (– Feb 2021)	100

- Feedbacks from the trade (in red) still being considered
- Confirmed arrangement will be announced to the trade later on CAD website and through emails / circulars



Planned Transition Period

- ▶ With effect from the commencement of Phase 1, RAs shall not recognise new ACs.
- ▶ RAs can still recognise new KCs or renew the status of existing KCs/ACs using declaration forms within the Transition Period, but their cargo shall be subjected to the increased screening percentage required for the relevant phase.
- ▶ All KCs/ACs recognised by RAs using declaration forms shall cease with effect from the commencement of Phase 3.
- ▶ RAs are required to submit Monthly Reports to CAD during the Transition Period. CAD will monitor compliance.
- ▶ **Entities interested in operating off-airport screening facility are strongly encouraged to make application for registration as RACSF well before the commencement of the transition period.**



Questions relating to New ICAO Policy Direction and RACSF Scheme

- ▶ Latest information about the New ICAO Policy Direction and RACSF Scheme

- ▶ <http://www.cad.gov.hk/english/icao2021.html> (English)
- ▶ <http://www.cad.gov.hk/chinese/icao2021.html> (中文)

- ▶ Enquiry Hotline

2910 8695

2910 8696

2910 8697

09:00 – 12:00 and 14:00 – 17:00

Monday – Friday except public holidays

- ▶ Enquiry Email

racsf@cad.gov.hk



Thank you!

Q & A

