



IATA Position Paper

Standardization requirements

<IATA Cargo>

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Extract: “Advance Security Notification”

DOCUMENT CONTROL & DISTRIBUTION

Version History

Version	Amendment Description	Date	By
1.8	CUSAG endorsement of Advance Security Notification position	31/03/2009	F.Leger

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1 IATA Position Paper

Today, and more so in the coming years, the international air-cargo industry is facing an unprecedented level of security regulations, together with both a self-imposed and government-imposed necessity to modernize their systems including their ability to communicate with customs agencies through the use of electronic messaging, and indeed to transport shipments through the use of electronic documents or their equivalents. As can be expected, the urgency felt by the industry to modernize its systems and operations can lead to the adoption of less than optimal or impractical standards and procedures.

The following IATA position paper is the product of meetings, surveys, consultations and work among industry experts from the airfreight supply chain. Although, the positions expressed herein do not reflect the positions of all industry stakeholders, they do represent the concerns and approaches that IATA has determined would best serve the industry as a way forward in light of the many initiatives facing the industry.

2 Objective

The objective of this document is to articulate the IATA position in relation to key issues. IATA will use this position paper to influence and lobby for standardization and harmonization.

3 Advance Security Notification

3.1 Description & Principles

Certain countries in accordance with the WCO Framework of Standards require advance import data submission, for example, the USA (Air AMS) and Canada (ACI), to facilitate security risk assessments. The EU plans to implement similar processes for import, export and transit in the near future (EU Regulation 648/2005 and implementing provision 1875/2006).

IATA believes it is essential that a standard approach be adopted to avoid the costly requirement for freight forwarders and carriers to develop systems, messages and interfaces to accommodate the initiatives of individual Customs authorities.

3.2 Importance

Importance is very high as the development costs can be exponential if trade has to provide each Customs Administration with different formats keeping in mind that Customs Administrations are independent even if they have adopted the WCO Framework of Standards. In addition standardisation and harmonisation will facilitate mutual assistance between Customs Authorities.

3.3 Position & Policies

3.3.1 All countries requiring advance security risk assessment information should move toward the WCO Framework of Standards, to allow harmonisation along the Airfreight supply chain.

- 3.3.2 The data requirement for advance risk assessment information should only be relevant to perform safety and security risk assessment and should not contain data elements relating to the fiscal clearance (tax and duties calculation).
- 3.3.3 Where export/import **goods declarations** are also used as the basis for conducting advance safety and security risk assessment, as well as the basis for determining fiscal clearance (tax and duties calculation) it should not require more information than laid out in the WCO Framework of Standards.
- 3.3.4 Where export/import **cargo declarations** are used as the basis for conducting advance safety and security risk assessment it should not require more information than laid out in the WCO Framework of Standards.
- 3.3.5 It must be clear and unambiguous as to which party (or which role in the supply chain) is responsible for providing each element of advance information.
- The freight forwarder should be responsible for providing house air waybill related security risk assessment data to Customs. The consignor originally provides many of the data elements associated with the house air waybill information. The freight forwarder should be responsible for non-submittal or late submission but the consignor should be held responsible by the freight forwarder for data accuracy and completeness of data provided and any related penalties that may arise there from.
 - Where a freight Forwarder submits required security risk assessment data via an air carrier, as a supplement to the MAWB / Manifest data being submitted by the air carrier to the Customs authorities, the air carrier is responsible for provision of such data to the regulatory authorities. The Carrier should be responsible for non-submittal or late submission but the Freight Forwarder should be held responsible by the Carrier for data accuracy and completeness of data provided and any related penalties that may arise there from.
 - The air carrier should be responsible for providing master air waybill and conveyance (manifest) related security risk assessment data to Customs.
 - In situations where no freight forwarder is involved in the transaction and the consignor deals directly with the air carrier, the carrier assumes responsibility for providing air waybill related security risk assessment data.
- 3.3.6 Regulatory authorities should hold the appropriate responsible party, outlined in section 3.3.5, liable for failure to provide timely, accurate or complete information.
- 3.3.7 Timings for submission of import advance security risk assessment data should be consistent globally and in accordance with the WCO Framework of Standards:
- Short haul: At time of "Wheels Up" of aircraft;
 - Long haul: 4 hours prior to arrival at the first port in the country of destination.

- 3.3.8 The WCO Framework does not provide recommendation on timelines for provision of export information but local legislation may. IATA position is that export information shall be required not earlier than 30 minutes prior departure.
- 3.3.9 Recipients of advance security risk assessment data should provide as soon as possible electronic confirmation to the declarant and to the carrier that all required information has been received.
- 3.3.10 Recipients of advance security risk assessment data should provide, as soon as possible, electronic notification to the declarant and to the carrier when the data is incomplete or inaccurate.
- 3.3.11 Recipients of advance security risk assessment data should provide, as soon as possible, electronic notification to the declarant and to the carrier when a positive risk has been identified. We recognize that in certain criminal situation Customs may not want to notify the parties.
- 3.3.12 Recipients of advance security risk assessment data should provide, as soon as possible, electronic notification to the declarant and to the carrier when no risk has been identified and that the cargo can continue with its onward transportation/procedure.
- 3.3.13 IATA recommends that electronic security risk assessment data submission should only become mandatory when the relevant authority:
- Has the capability to receive the submission electronically;
 - Has the capability to respond electronically with control and release messages;
 - Does not require the same information to be re-sent in another format or in paper copy.