DG TAXUD

EU guidance on air cargo security referral protocols

ICS2

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General disclaimer

This guidance document is of an explanatory and illustrative nature. Customs legislation takes precedence over the content of this document and should always be consulted. The authentic texts of the EU legal acts are those published in the Official Journal of the European Union. There may also be national instructions.

Drafting procedure

This guidance document has been drafted by the Project Group "Air Cargo Security" under Customs 2020 programme (CPG/036). It has been endorsed by the Customs Expert Group – Controls and Risk Management (CEG-CRM).

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- Editorial, formatting, and spelling
- Clarification

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Revision	Date	Created by	Short Description of Changes
1.15	24/01/2020	DG TAXUD	Final version following review of the CEG-CRM
1.14	29/11/2019	DG TAXUD	Reformatting and insertion of the messages
1.13	11/10/2019	DG TAXUD	Draft version after Air cargo security Project group meeting

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[1] This document has been prepared by the Customs2020 Air cargo Security Project Group (Representatives of Customs, Civil Aviation, EEA, PostEurop, IATA, UPU). DG MOVE was always present and strongly supported this work.

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1   INTRODUCTION

1.1 Purpose

The purpose of this document is to provide and to develop guidance for ICS2 referral protocols in more operational detail for the **Release 1** of the ICS2 scheduled for 15 March 2021.

This document builds upon the 'Referral protocols for air cargo and mail under the EU Pre-loading advance cargo information (PLACI) risk analysis process' jointly prepared by customs and civil aviation security communities to ensure coherency and alignment between customs and civil aviation security legislation. It aims to provide guidance in organising the steps and measures that need to be taken by the concerned stakeholders for the protocols to efficiently respond to the referrals that might arise following the pre-loading advance cargo information (PLACI) submission. Taking account of the respective roles and responsibilities of the customs and civil aviation communities, unnecessary duplication should be avoided and potential security gaps be closed, without unduly disrupting business processes.

This guidance will also form an integral part of the overall ICS2 implementation guidance compendium.

1.2 Scope

This document provides an operational guidance for the air cargo security referrals process implemented within EU ICS2 system and operational environment of the involved stakeholders. It also explains fall-back procedures and communication channels where the ICS2 IT components (both customs and the economic operator) are not available to execute the processes in automated way.

The document does not cover the other parts of the use of the ICS2 system: lodging of the ENS and related data requirements, validation, rejection and registration of the ENS filings, detailed content of referrals and risk analysis outcomes messages, risk analysis processes between the customs authorities, etc. These aspects will be covered by other artefacts of the ICS2 Implementation Guidance Compendium.

1.3 Target Audience

The intended audience for this document are:

- the representatives of the Member States,
- the representatives of the Trade Associations and their members;
- any person involved in ICS2 project;
- any person lodging an ENS.

1.4 Structure of this document

The present document contains the following chapters:

- **Chapter 1 – Introduction**: describes the scope and the purpose of the document;
- **Chapter 2 – Background:** explains the background for ICS2 project, PLACI data and referrals;
- **Chapter 3 – Relevant EU legislation:** explains the applicable EU legislation;
- **Chapter 4 – Referral processes in more operational detail**: describes in detail the referral process, messages exchanged and codes to be used;
- **Chapter 5 – Fall-back procedures (to be elaborated):** explains the procedure to be followed in case of the unavailability of the IT systems;
- **Appendix 1: Postal processes –** provides detailed guidance for postal operators.
- **Appendix 2:** JWGACI guiding principles.

1.5 Reference and applicable documents

1.5.1 Reference Documents

Ref.	Title	Reference	Version	Date
R01	ICS2 Common Functional System Specifications	ICS-CFSS	1.14	2019-11-29
R02	ICS2 Common message implementation guidance		tbd	
R03	ICS2 Business Continuity Plan		tbd	
R04	Joint WCO-ICAO Guiding Principles for Pre-Loading Advance Cargo Information			
R05	Commission Implementing Decision C(2015)8005			
R06	Commission Implementing Regulation (EU) No 2015/1998			
R07	ICAO Aviation Security Manual, Doc. 8973			
R08				
R09				

Table 1: Reference documents

1.6 Abbreviations and Acronyms

Abbreviation/Acronym	Definition
AC	Assessment Complete
ACC3	Air cargo or mail carrier operating into the EU from a third country airport
AVSEC	Aviation security
CFSS	Common Functional System Specifications
CSD	Consignment Security Declaration
DNL	Do Not Load
DO D	Designated operator at destination
DO O	Designated operator at origin
eCSD	Electronic Consignment Security Declaration
ENS	Entry Summary Declaration
EO	Economic operator
EU	European Union
FoS	Framework of Standards
GHA	Ground handling agent
HAWB	House air waybill
HRCM	High Risk Cargo and Mail
ICAO	International Civil Aviation Organization
ICS2	Import Control System 2
IE	Information exchange
IED	Improvised explosive device
IID	Improvised incendiary device
JWGACI	Joint ICAO WCO Working Group on Advance Cargo Information
KC3	Third Country Known Consignor
MAWB	Master air waybill
MS	Member State

PLACI	Pre-loading advance cargo information
RA3	Third Country Regulated Agent
RFI	Request for Information
RFS	Request for Screening
UPU	Universal Postal Union
WCO	World Customs Organisation

Table 2: Abbreviations and acronyms

1.7 Definitions

Term	Definition
ACC3	Air Cargo or Mail Carrier operating into the EU from a Third Country Airport.
PLACI data	Pre-loading advance cargo information (PLACI) comprise consignor name and address, consignee name and address, number of packages, gross weight, goods description and transport reference number (HAWB/MAWB).
PLACI risk analysis	In the case of air cargo pre-loading, the risk analysis process is triggered at the moment of receipt of the required minimum 7+1 PLACI data. The process is only focused on the detection of an immediate risk to aviation posed by an assembled improvised explosive device (IED) or improvised incendiary device (IID) aka 'bomb in the box' introduced on board an aircraft that could lead to the destruction of the plane and/or the loss of lives. The PLACI analysis is therefore not intended to assess or confirm the effectiveness of aviation security measures applied by the supply chain actors nor measure the compliance with these regulations or duplicate them. In the case of air transport (general cargo, postal consignments, express consignments), the pre-loading risk analysis may identify security and safety risks other than the one described above. While this result is taken into account in the further process of risk analysis at the pre-arrival stage, it does not stop the goods to be loaded on the plane at the point of departure into the EU.
Postal item	Means Goods other than items of correspondence contained in a postal parcel or package and conveyed under the responsibility of or by a postal operator in accordance with the provisions of the Universal Postal Union Convention.

Table 3: Definitions

2 BACKGROUND

Since the Yemen air cargo security incident, the aviation ACC3 regime (Air cargo or mail carrier operating into the EU from a third country airport – ACC3) was put in place. It is applicable and implementation experiences have been gathered over the years.

For the customs side, legislation introducing pre-loading advance air cargo information (PLACI) submission requirements for a reduced data set (7 + 1 data) and stipulating three referral types for air cargo (i.e. referral for information; high risk cargo and mail screening; do not load) is in force. It will become applicable with the release 1 of Import Control System 2 (ICS2) for limited scope of air traffic, notably goods in express and postal consignments. Release 1 start of operations is scheduled for 15 March 2021. Release 2 of the ICS2 will complete – from the PLACI regime viewpoint – these new measures for entire air cargo, including also general freight under responsibility of air carriers and freight forwarders.

The EU legislation and the IT development build upon the experiences and fact-finding obtained from the EU Preloading Consignment Information on Secure Entry (PRECISE), the time limited pilot conducted by French Customs (Express pilot/AMAS), the pilot by German Customs, the time limited pilot by UK Customs (PREDICT) and activities under the EU Postal Pilot. Moreover, the EU plays close attention to the US ACAS.

Internationally, the PLACI principles, pre-loading advance air cargo information submission requirements and issuing referrals for air cargo, have developed into an agreed concept.

In 2015, these principles were taken on board of the WCO SAFE Framework of Standards (FoS). The concept of PLACI for a reduced data set (7+1 data defined as Annex II in the SAFE FoS) as well as the concept of referrals (three referral types: request for information; request for high risk cargo and mail screening; do not load) were introduced.

Through Joint WCO - ICAO guiding principles for Pre-Loading advance cargo information (PLACI), international customs and civil aviation communities agree on high-level basic PLACI concept and principles. (6.2 Appendix 2: JWGACI guiding principles.)

3   RELEVANT EU LEGISLATION

3.1 The ACC3 regime

The ACC3 (Air cargo or mail carrier operating into the EU from a third country airport – ACC3) regime, established by Commission Implementing Regulation (EU) No 2015/1998 and Decision C(2015) 8005, stipulates that cargo and mail entering the EU on an aircraft must be controlled according to EU air cargo screening obligations unless it comes from an airport located in a country exempted from these rules . The application of such controls shall be ensured by the ACC3 or, if applicable, by an EU approved Third Country Regulated Agent (RA3) from which the ACC3 receives cargo or mail.

Unless exempted, cargo or mail consignments received for transport into the EU must be subjected to the following controls. EU in-bound consignments shall be flown into the EU by an air carrier that has obtained the designation as ACC3 by an EU Member State and is responsible to ensure that either,

- physical screening of the consignment took place under its own responsibility or the responsibility of an RA3; or
- consignments have been processed through a secure supply chain, originating under the responsibility of an EU approved Third Country Known Consignor (KC3) and delivered directly to the ACC3 or through a RA3 also responsible for issuing the security status.

Enhanced controls prior to their loading on board of an aircraft to the EU must apply to air cargo and mail consignments considered as high risk (HRCM) based on the integrated EU Aviation security risk assessment criteria. In parallel and at global level ICAO defined high risk cargo and developed further air cargo control mechanisms.

While base-line screening of cargo or mail is confirmed and documented through a Consignment Security Declarations (CSDs) containing the appropriate security status attributed to the shipment, stating SCO (meaning secure for all-cargo and all-mail aircraft only) or SPX (means secure for passenger, all-cargo and all-mail aircraft), high risk cargo screening is declared by the security status SHR (which thus means secure for passenger, all-cargo and all-mail aircraft in accordance with high risk screening requirements). Security Status declarations are to be issued by the RA3 or the air carrier.

3.2 ICS2

Since the implementation of the EU Customs Security Legislation in 2011 the Customs authorities of the EU Member States have a legal responsibility to ensure that a risk analysis is carried out and finalized primarily for security and safety purposes. Operationally, customs authorities use a system of advance cargo declaration (Import Control System – ICS) that is linked to their national risk systems. They must make a decision in terms of necessary measures to be taken to mitigate any identified risk (e.g. action by the economic operator, or customs control action at different points of the supply chain).

Prompted by the Yemen incident of October 2010, the EU and its Member States performed detailed operational, policy and legal review that resulted in the EU customs risk management strategy and action plan. This has led to legal (as part of the Union Customs Code – Council Regulation (EU) No 952/2013 and its implementing legislation), operational and IT changes to the advance cargo information regime. The reform is devised to equip customs authorities to better analyse and respond to the newly identified security threats to the goods supply chains in all transport modalities.

In the context of the air cargo and mail, the next generation of the EU advance cargo information system – ICS2 - allows EU Member States authorities to analyse cargo data prior to loading in a third country and apply - as a complementary measure to the ACC3 regime – electronic based risk assessment and mitigation measures.

The ICS2 ensures:

- the collection and analysis of advanced information on air cargo and mail prior of being loaded on board of an aircraft in a third country that is bound to the EU;
- electronic based real time risk assessment by the customs authorities of that information;
- any risk mitigation measures by customs and economic operators considered appropriate in relation to identified risk level for cargo and mail destined to enter the EU.

The risk assessment following the pre-loading (PLACI) data submission is only focused on the detection of an immediate security risk to aviation, which is the bringing on board of an aircraft of articles prohibited by

aviation security legislation that could lead to the distortion of the plane and/or the loss of lives, e.g. an assembled improvised explosive or incendiary device (IED- IID), a 'bomb in the box'.

The following risk mitigation measures are included into the Union Customs Code Implementing Regulation:

- request for further information on the particulars (data quality and accuracy referral); known as RFI notification, and corresponding response to the request for information
- request for High Risk Cargo and Mail screening (HRCM) by making use of EU Civil Aviation measures; known as RFS notification and corresponding response to the request for HRCM screening, and
- 'Do Not Load'; known as DNL notification.

Compliance with these risk mitigation measures is a legal obligation on the economic operators to whom they are addressed by the customs authorities.

Risk mitigation measures must be carried out as effectively and efficiently as possible, i.e. least disruptive on the supply chain, as early as possible and at the latest before cargo or mail is loaded onto an aircraft at the last airport before entering the EU Customs territory.

From the operational and technical perspective the RFI and RFS notifications are considered as risk mitigation referrals that are triggered during the ongoing customs risk analysis process. Their purpose is to enable customs authorities to resolve identified concern regarding potential air cargo security risk on a particular consignment. It is thus of paramount importance that economic operator to whom these referrals are notified provides timely and appropriate response, in order to allow customs to complete risk analysis. As long as customs is unable to complete risk analysis due to unanswered request for RFI or RFS, the goods can in principle move along the supply chain until the airport where the cargo or mail is departing to the EU customs territory (last point of departure).

In contrast to RFI and RFS, DNL notification from customs to the economic operator concerned already represents a completed risk analysis and as such a customs decision on the basis of that analysis that identified an imminent air cargo security threat posed by a particular consignment.

In the event the customs authorities conclude risk analysis and no air cargo security threat is identified at the time when analysis was done (e.g. on the basis of available knowledge, intelligence at that point of time), the customs authorities will issue an Assessment complete message to the economic operator that filed PLACI data. The assessment complete message will notify the relevant economic operator(s) that customs has completed its risk analysis and no further action is required from the side of economic operators involved in the given transaction.

Cooperation between different authorities and as well as authorities and economic operators must be defined clearly at national level, including the definition of communication channels by way of referral protocols. The particularities of the different air cargo business models (express, postal model) should be taken into account.

All concerned stakeholders will send messages (Assessment complete, RFI, RFS, DNL, as the case may be) and will respond to these messages with best endeavour in a timely manner.

4 REFERRAL PROCESSES IN MORE OPERATIONAL DETAIL

4.1 PLACI risk analysis

In the case of air cargo pre-loading, the risk analysis process is triggered at the moment of receipt of the ENS filing containing the required PLACI data. The PLACI risk assessment is only focused on the detection of an immediate risk to aviation. This is the bringing on board of an aircraft of articles that are prohibited by aviation security legislation that could lead to the destruction of the plane and/or the loss of lives, namely an improvised explosive device or incendiary device (IED or IID), aka 'bomb in the box'. Where the PLACI risk analysis results would detect a potential of other type of security and safety risk (not air cargo security), this result is taken into account in the further process of risk analysis at the pre-arrival stage but doesn't stop the goods to be loaded on the plane.

PLACI provision should not unnecessarily impede or delay the flow of cargo movements through the supply chain. Where Customs notify the operator that it has significant unresolved concerns arising from PLACI risk analysis that relate to air cargo security, the cargo should not be loaded onto the aircraft until appropriate measures have been taken to mitigate the risk. All concerned stakeholders will deploy best endeavour to send messages (Assessment complete, RFI, RFS, DNL, as the case may be) and responses to those messages.

Factors to consider and referral types (RFI, RFS, DNL)

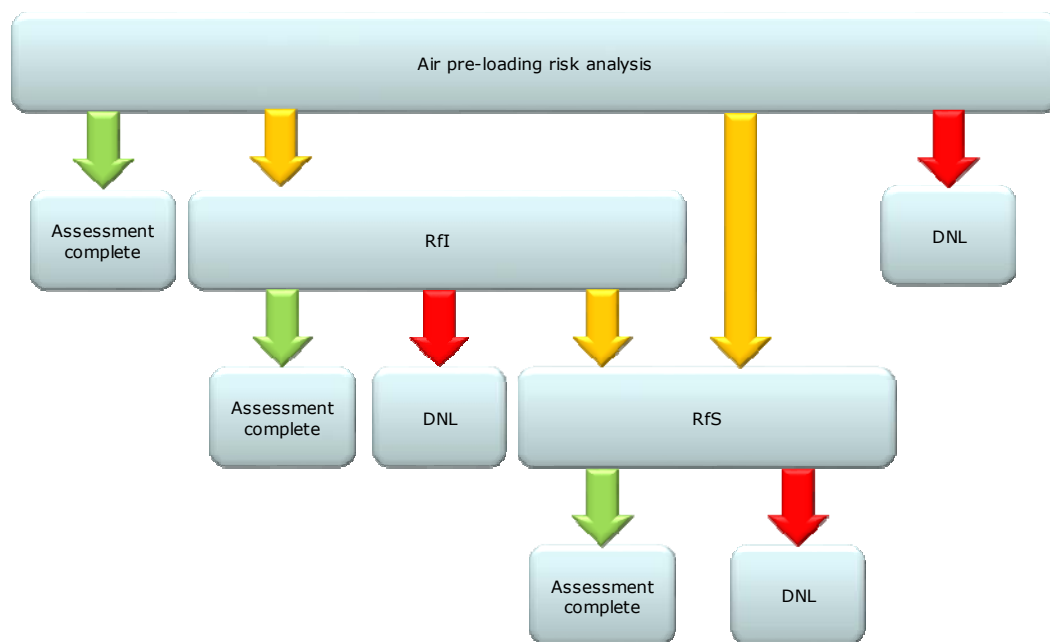|	
PLACI data is incomplete	ENS Filing to be rejected
PLACI risk analysis successfully completed	No further action – Assessment complete (AC)
Data is not sufficient	Request for information (RFI)
Potential security risk	Request for screening (RFS)
Security risk confirmed	Do Not Load (DNL)

Referral scenarios

Figure 1: Overview of the referral scenarios

There is no obligatory sequence as regards the issuing of the different referral types. For example it is not necessary to issue an RFI first, if the condition already warrants the issuing of an RFS or DNL. However, any referral issuing decision taken shall be proportional to the risk to address.

Moreover, it is important to underline that a referral will always require a response from the EO, irrespective of the follow-up to the referral. **The response from the EO to a referral is mandatory**. The EO's response to a referral does not automatically lead to the completion of the customs risk analysis. The customs authority will include the information obtained from the responses of referrals into their ongoing risk analysis process and will conclude that process either by Assessment complete (AC) message or DNL notification. The EO's response to the RFI and RFS should thus not be equated with an assessment complete message (for example, before issuing an assessment complete, it is necessary for the EO to send a response first)[2]. Resolving a referral is part of the completion of the risk analysis process.
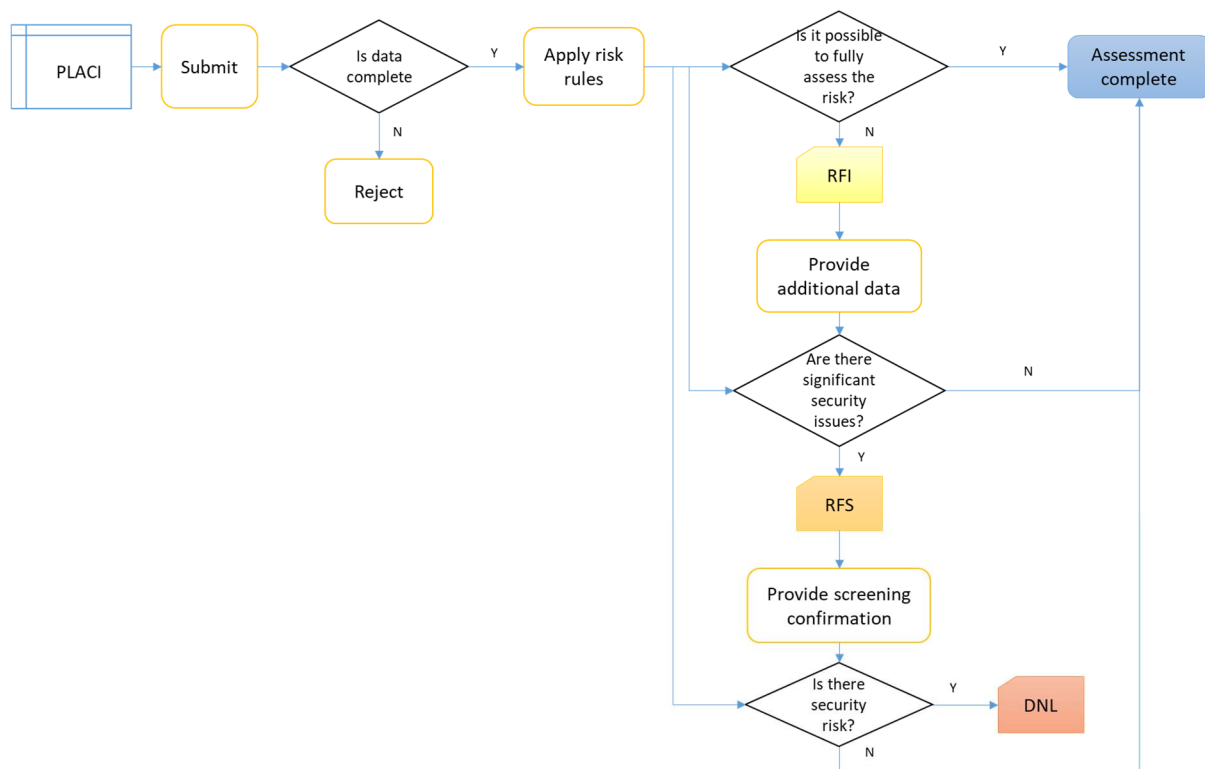
Figure 2: Referral process

4.2 PLACI data is not complete

Although 'officially not considered a referral', there is a link with the RFI as it relates to the PLACI data requirements. In case the PLACI data elements are incomplete (i.e. missing mandatory data elements) or are not in line with the agreed ICS2 system specifications, **the ENS filing is rejected and an error message is sent** to the EO.

Consequently, this means that EO has not complied with the PLACI data requirements. The EO needs to ensure to act upon such an error message as early as possible and to provide within the legally required time limits the PLACI data both from perspective of correctness and completeness.

In the case of technical issues, where EO considers that data has been sent compliant with the requirements, the EO should contact as early as possible the ICS2 National Helpdesk of the Member State customs authority to which data was addressed. For the operational procedures using the ICS2 Helpdesk, please consult separate guidance [ref number and link to be provided when it becomes available – project is ongoing].

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[2] For 'simplicity' reasons this presentation does not cover cases where DNL can be issued directly at any step.

4.3 No further action – Assessment complete (AC)

Based on available experiences, it is expected that 'no further action' will be communicated in a large majority of cases on a purely automated basis, without any intervention by the human factor i.e. customs risk analyst.

The PLACI risk analysis processes being successfully completed will be confirmed through an Assessment complete (AC) message. The AC message can be generated:

- in vast majority of cases automatically, or

- as a result of a manual mitigation and decision of a risk analyst in charge of air cargo security risk assessment.

In both cases, an AC message is sent by ICS2 to the EO filing PLACI data. Its receipt by the EO is optional[3].

If an operator makes a commercial decision to proceed with loading the consignment on board of the aircraft without assessment complete, it is at their own risk. Bearing in mind that a risk assessment could still be ongoing that could lead to follow-up requests that would need to be answered. It is the responsibility of the air carrier to decide whether to allow loading of the consignment for which a referral is open and no AC message is received.

In case new intelligence arises, the assessment complete may still be followed by RFI/ RFS/DNL. In such case EO is obliged to follow-up and fully comply to the referrals even though AC has already been issued earlier. There could be an operational situation where the EO already loaded and air-born goods onto the last aircraft destined to the EU. These situations will be dealt on a case by case basis between authority and EO concerned, depending on the level of threat identified (e.g. in case of DNL situation to trigger applicable aviation security measures in place for such situation).

4.3.1 Assessment complete (IE3N03) message

AC message is issued for each House consignment (consignment covered by one HAWB, postal item) declared in the ENS filing. House consignment is identified via the transport document.

4.3.1.1 Message IE3N03 content

Occurs	Data class/element	Explanation
	IE3N03	
1..1	**MRN**	Registration number of the ENS filing
1..1	**Completion date**	Date of completion of the risk assessment
1..1	**Assessment complete**	
0..1	**Transport document (House level)**	
1..1	**Reference number**	Reference number of the transport document (HAWB, postal item number (S10))
1..1	**Type**	Type of the transport document
1..1	**Responsible Member State**	
1..1	**Country**	Member State responsible for the risk assessment
0..1	**Representative**	
1..1	**Identification number**	EORI number of the representative (if declared in the ENS filing)
0..1	**Declarant**	
1..1	**Identification number**	EORI number of the declarant

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[3]   For details relating to the messages and technical possibilities of the EO filing PLACI data to activate or dis-activate the AC messages, see Common Technical System Specifications for ICS2.

4.4 Request for Information (RFI)

An RFI should be sent for consignments when it is not possible to fully assess the risk to aviation security with the information contained in the initial ENS PLACI filing. Such requests should be communicated by the customs authorities to the EO ENS PLACI filing as soon as possible[4].

The economic operator should respond with the information requested as soon as possible, to enable the authorities to perform the risk assessment. Some economic operators may provide to customs authorities in charge of risk assessment the access to their internal operator's systems to reduce the need for RFI referrals. During this process cargo can continue to move through the supply chain.

4.4.1 Organisational and operational availability requirements

All actors need to provide necessary organizational and operational availability, as follows:

Customs authority as a sender of the RFI needs to provide:

- 24/7 availability;

- Operational availability and contact details of Customs (with civil aviation depending on the national set up).

EO as a recipient of the RFI needs to provide:

- 24/7 centralized/single point of contact (depending on the business model) and availability.

- The EO needs to ensure to have access to the information and documents likely to be requested and EO having established operational processes to respond to the request.

- Interfacing with the ICS2 or in the case of postal model, also interface between origin and destination DOs is compulsory, to support all required message exchange.

4.4.2 Language to be used

Whenever free text is used in exchanges, or during contacts between senders and recipients of requests, **use of English language is strongly recommended** (in particular to avoid situations where actors involved in the process would lose time due to a need to translate).

4.4.3 RFI request message (IE3Q02)

The RFI is to be communicated via the ICS2 (as closed system) to the EO that submitted the data. .

There are two types of request that customs authority can decide to issue in the RFI message, depending on the reasons behind:

- request either additional information to be provided by the EO, or

- an amendment of the ENS filing.

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[4] In the case the ENS PLACI is not filed by air carrier, the RFI message is not communicated to an air carrier as PLACI dataset does not contain identity of the air carrier.
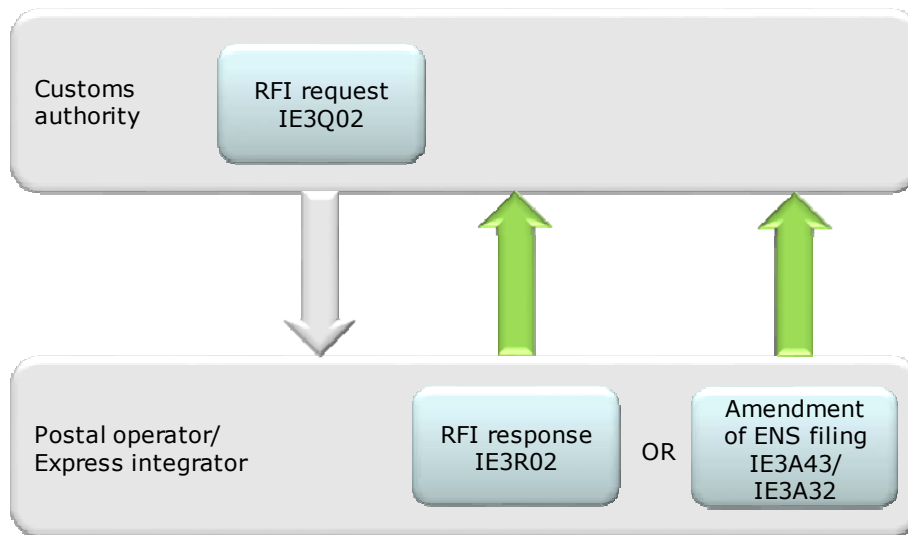
Figure 3: RFI message exchange

These two types of request can be issued independently, there is no general rule of cascading. However, in some specific cases, the customs may follow-up after receipt of the additional information with the RFI requesting the EO to amend the filing.

Some economic operators may provide to customs authorities in charge of risk assessment access to their internal systems to reduce the need for RFI referrals. The choice of use of this possibility is optional and in agreement between the Customs authority in charge of risk analysis and EO and is case by case driven.

4.4.4 Request for additional information

Request for additional information is issued where there is need for expansion/elaboration of the already provided PLACI data allowing customs to have more background information by providing adequate data (e.g. based on Air waybill, consolidated cargo manifest, commercial invoice etc.) and/or supporting documents. This message will be triggered by a manual process (on the customs side), when a specific consignment has been presented to the analyst after as an outcome of an automated risk assessment.

The response by the EO to this request will be included into the manual targeting process of an ongoing risk analysis.

4.4.4.1 Message IE3Q02 content

Occurs	Data class/element	Explanation
	IE3Q02	
1..1	**Document issue date**	The date of the RFI request
1..1	**MRN**	Registration number of the ENS filing
1..1	**Responsible Member State**	
1..1	Country	Member State which is issuing the RFI
0..1	**Representative**	
1..1	Identification number	EORI number of the representative (if declared in the ENS filing)
0..1	**Transport document (House level)**	
1..1	Reference number	Reference number of the transport document (HAWB, postal item number (S10))
1..1	Type	Type of the transport document
1..1	**Declarant**	
1..1	Identification number	EORI number of the declarant
1..99	**Referral request details**	
1..1	Referral request reference	Unique identifier of the referral request
1..1	Request type	When RFI is issued requesting additional information to be provided, the code 'RFI' will be used

0..99	**Supporting documents**	See 4.4.4.2 Supporting documents
1..1	**Reference number**	Reference number of the supporting document as declared in the ENS filing
1..1	**Type**	Type of the document as declared in the ENS filing
0..99	**Additional information**	See 4.4.4.3 Additional information
0..1	**Code**	Codes 'B10', 'B20', 'C10', 'D10' and 'S10' can be used
0..1	**Text**	
0..1	**Information type**	Default code 'R1' will be used

4.4.4.2   Supporting documents

This class will be used in case the supporting documents are declared in the ENS filing (not mandatory PLACI data element, however, for postal ENS it is possible to declare more data that will be necessary for the pre-arrival phase) and the risk analyst needs only the binary image of a specific document to be provided. In this case the type and the reference number of the document will be indicated.

4.4.4.3   Additional information

Additional information class will be used to provide the instructions of the risk analyst as to what additional information needs to be provided by the EO. This class can be repeated several times to issue multiple instructions for the same House consignment.

Additional information may be requested as part of this type of RFI also on optional sub-fields within PLACI dataset, such as phone (landline or mobile phone) numbers or e-mail addresses. Optionally, the EO can already provide such details in the original ENS filing.

Additional information code:

Code	Description
B10	Provide phone number and e-mail address(es) of Consignor
B20	Provide phone number and e-mail address(es) of Consignee
C10	Confirm PLACI data elements
D10	Provide all available documents
S10	Provide information whether HRCM screening has taken place

Additional information text:

This data element will be used by the risk analyst in combination with certain Additional information codes to provide more detailed information on the request:

Code	Text used	Description
B10	No	
B20	No	
C10	Yes	Customs will specify that they want to have confirmation of a specific PLACI data.
D10	No	
S10	No	

Examples:

Code	Text	Example of request
B20		EO is expected to provide the telephone number and/or e-mail address of the consignee.
C10	Consignee name	'Beautiful Angel' is given as name of the consignee. In this case, the EO should confirm the correctness of the provided information against the available documentation.
C10	Consignor post code	The EO is expected to verify the correctness of the post code of the consignor declared in the ENS in other sources.
D10		The EO is expected to provide as attachment images of all available documents accompanying the consignment.
S10		EO is expected to inform whether the HRCM screening had been performed. If yes, the method and the result of such screening is also expected to be provided.

4.4.5 Request for amendment

Amendment of PLACI data is needed, when PLACI data is of 'inadequate' or un-acceptable quality for risk analysis. In the case of an amendment, the risk analysis process is restarted, in particular to make the system verify with automated risk systems, and the amended file is included into the open – ongoing risk analysis case treated by the risk analyst.

4.4.5.1 Message IE3Q02 content

Occurs	Data class/element	Explanation
	IE3Q02	
1..1	**Document issue date**	The date of the RFI request
1..1	**MRN**	Registration number of the ENS filing
1..1	**Responsible Member State**	
1..1	**Country**	Member State which is issuing the RFI
0..1	**Representative**	
1..1	**Identification number**	EORI number of the representative (if declared in the ENS filing)
0..1	**Transport document (House level)**	
1..1	**Reference number**	Reference number of the transport document (HAWB, postal item number (S10))
1..1	**Type**	Type of the transport document
1..1	**Declarant**	
1..1	**Identification number**	EORI number of the declarant
1..99	**Referral request details**	
1..1	**Referral request reference**	Unique identifier of the referral request
1..1	**Request type**	When RFI is issued requesting the amendment of the ENS filing, the code 'AMD' will be used
0..99	**Additional information**	See 4.4.5.2 Additional information
0..1	**Code**	Codes 'A10', 'A20', 'A30', 'A40', 'A50', 'A60' and 'A70' will be used
0..1	**Text**	
0..1	**Information type**	Default code 'R1' will be used

4.4.5.2 Additional information

Additional information class will be used to provide the instructions of the risk analyst as to which data elements of the PLACI data need to be amended by the EO. This class can be repeated several times to issue multiple instructions for the same House consignment.

Additional information codes:

Code	Description
A10	Amend Consignor name
A20	Amend Consignor address
A30	Amend Consignee name
A40	Amend Consignee address
A50	Amend number of packages
A60	Amend description of goods
A70	Amend gross mass

Additional information text:

This data element can be used in combination with any of the Additional information code to provide more detailed information on the request.

Examples:

Code	Text	Example of request
A10	consignor name 'ABCD123'	Consignor name does not look like a real one. It should be verified and, if it is not correct, corrected via the ENS amendment.
A20	Street name is same as city name	Consignor address in which street name is same as place name. EO is expected to correct the erroneous data.
A20	Consignor city spelling mistake	Consignor address with a spelling mistake: after the spelling mistake is clarified, the EO amends the PLACI data.

4.4.6 RFI response message (IE3R02)

The RFI response message, in first place, has to be sent by the EO in reply to the request for additional information. In addition, this message can be sent in response the request for amendment, in case it is not possible to fulfil the request, e.g. the EO does not have the necessary data.

The operators also can submit any information they deem necessary (e.g. results of screening if available).

4.4.6.1 Message IE3R02 content

Occurs	Data class/element	Explanation
	IE3R02	
1..1	**Document issue date**	The date of the RFI response
1..1	**MRN**	Registration number of the ENS filing
1..1	**Responsible Member State**	
1..1	**Country**	Member State which issued the RFI
0..1	**Representative**	
1..1	**Identification number**	EORI number of the representative (if declared in the ENS filing)
1..1	**Declarant**	
1..1	**Identification number**	EORI number of the declarant
1..99	**Additional information response**	
1..1	**Referral request reference**	Unique identifier of the referral request
0..99	**Additional information**	See 4.4.6.2 Additional information
0..1	**Code**	Codes 'A00', 'B00', 'B01', 'C00', 'C01', 'D00', 'D01', 'D02', 'S00' and 'S01' will be used
0..1	**Text**	
0..1	**Information type**	Default code 'R2' will be used
0..9	**Binary attachment**	See 4.4.6.3 Binary attachment
1..1	**Identification**	
1..1	**Filename**	
1..1	**MIME**	
0..1	**Description**	

4.4.6.2 Additional information

The additional information has to be provided using the relevant codes and textual information, where relevant. The additional information class can be repeated several times to capture all the necessary codes.

Additional information code:

Code	Description
A00	Amendment is not possible
B00	Additional information cannot be provided
B01	Additional information is provided
C00	PLACI data element is not confirmed
C01	PLACI data element is confirmed
D00	No documents can be provided
D01	Documents are provided
D02	Additional information provided
S00	HRCM screening not performed
S01	HRCM screening performed

Additional information text:

This data element will be used in combination with certain Additional information codes to provide the requested information or an explanation.

Code	Text used	Description
A00	No	
B00	No	
B01	Yes	The text should contain the information that was requested.
C00	Yes	PLACI filer must, in addition to this response, amendment the original PLACI filing
C01	No	
D00	No	
D01	No	No textual information needs to be provided, however, the documents should be attached as binary attachments (see 4.4.6.3 Binary attachment). The documents can be, for example, invoice, eCSD, loading lists, transport documents.
D02	Yes	This code to be used in response to the RFI code 'D' in case where HRCM screening had been performed and the EO would like to inform customs about that and the result of it. The text should contain: 'HRCM screening performed/Method: (provide the code(s) of the screening method 'AOM', 'CMD', 'EDD', 'EDS', 'ETD', 'PHS' 'VCK', 'XRY')/Result: ('Alarm' or 'No alarm')'
S00	No	
S01	Yes	Method and result of the screening has to be provided. The text should contain: Method: (provide the code(s) of the screening method 'AOM', 'CMD', 'EDD', 'EDS', 'ETD', 'PHS' 'VCK', 'XRY') /Result: ('Alarm' or 'No alarm')

Examples:

RFI request code	RFI request text	RFI response code	RFI response text	Explanation
A20	Street name is the same as city	A0	No street name exists, name of the village is repeated as workaround	EO was requested to amend the consignor address, in which street name is same as city name. After clarification that the village or place has no street name, this workaround is used by EO[5]. No amendment is triggered.
B20	-	B01	+32123456789	If the telephone number of the consignee is available, it is provided. The telephone number should have

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[5] Fields not populated (like a missing street) will automatically lead to a rejection of the message (i.e. incomplete mandatory PLACI). Where data does not exist, e.g. no street name, the EO will need to populate the data field with an alternative /available information. This is further elaborated in the ICS2 Common message implementation guidance [add document reference when available].

				the international phone number format as defined in the ITU-T recommendation E.123 (02/2001): '+''country code''phone number'
B20	-	B01	addressee@email.com	If the e-mail address of the consignee is available, it is provided.
B20	-	B00	-	If neither telephone number, nor the e-mail address of the consignee is available, this response code is provided.
C10	Consignee postcode	C01	-	Customs asked to confirm that the consignee postcode is correct. After verification, it is confirmed to be correct.
C10	Consignee postcode	C00	-	Customs asked to confirm that the consignee postcode is correct. After verification, it is found to be incorrect. In this scenario the PLACI data has to be amended.
D10	-	D01	-	Documents accompanying the consignment are available. Documents have to be attached as binary attachments
D10	-	D00	-	There are no documents accompanying the consignment. This response code is provided.
D10	-	D02	HRCM screening performed/Method: XRY, EDD/Result: No alarm	Customs did not ask whether HRCM screening had been performed, but it was, and the EO decides to inform about it. Screening method and result should be provided.
S10	-	S01	Method: XRY, EDD/Result: No alarm	Customs asked whether HRCM screening had been perform. HRCM screening had been performed and the EO is able to provide the method used and the result of that screening.
S10	-	S00	-	Customs asked whether HRCM screening had been perform. HRCM screening had not been performed, this code is to be provided as response.

4.4.6.3 Binary attachment

Document images that are to be submitted as binary attachments must be in the following format: pdf, jpeg, png.

4.4.7 Amendment of the PLACI data

If customs requested the amendment of the PLACI data or if the EO finds after verification of the PLACI data that the particulars are incorrect, the amendment message has to be submitted:

- IE3A43 by postal operator

- IE3A32 by express integrator

The Referral request reference provided in the RFI message (IE3Q02) has to be indicated in the amendment message. If this reference will not be indicated, it will be considered by the customs that the EO has not complied with the RFI request.

Occurs	Data class/element	Explanation
	IE3A43/IE3A32	
1..1	**Document issue date**	
0..1	**Referral request reference**	Referral request reference received from customs via RFI message IE3Q02
1..1	**MRN**	
1..1	**Specific circumstance indicator**	

4.4.8   Follow-up to sufficient feedback

Where, based on all the information, knowledge and documentation available, the assessment of the customs risk analyst leads to the conclusion that there is still a potential security risk, this may lead to applying further risk mitigation measures. Where the analyst assesses that there is no such risk, the analyst sends an assessment complete message (AC).

In the absence of sufficient feedback within a reasonable time frame, the risk analyst will have to assess the security risk based on insufficient information provided and this may lead to further mitigation measures, though it may also be decided that assessment complete (AC) is appropriate.

If no assessment complete message is sent, goods can continue to move until the last airport of loading before goods are taken on an aircraft destined to the EU. If an operator makes a commercial decision to proceed with loading the consignment on board the aircraft without the assessment complete, it is at their own risk. It is responsibility of air carrier to decide whether to allow loading of consignment for which a RFI referral is open and no assessment complete message sent.

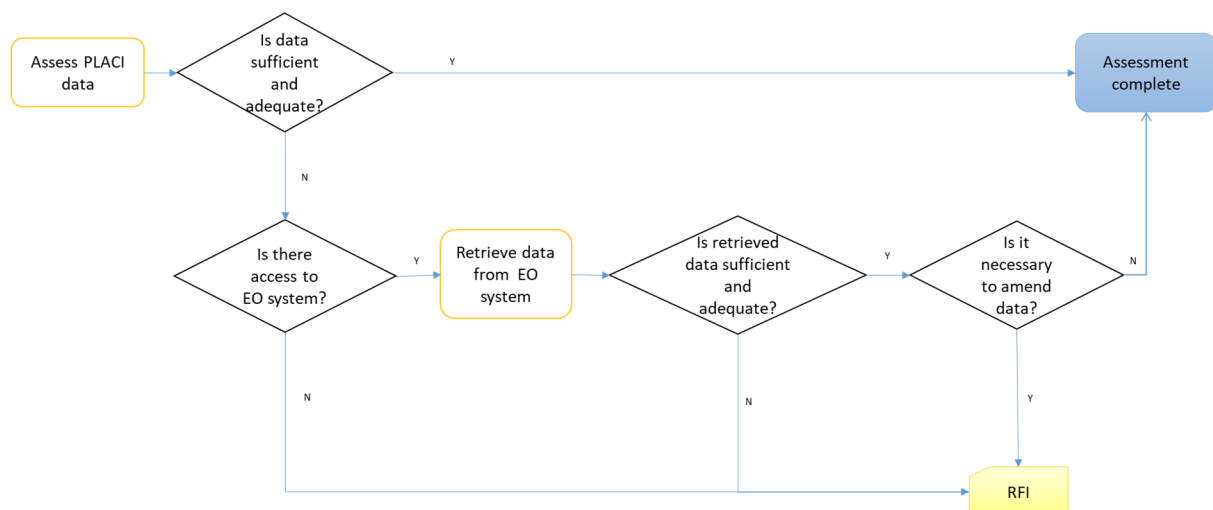## 4.4.9 Step by step Regulator (Customs) process overview

Figure 4: Regulator's process of issuing RFI

Step	Description	Next step
1	Assess, if the PLACI data is sufficient and adequate	If yes, issue AC
		If no, go to step 2
2	Is access to the EO system available (optional in agreement between Customs authority and EO)?	If yes, go to step 3
	If available, decide whether accessing the EO system might solve the data quality issues (remit of the targeter)	If no, go to step 6 (RFI)
3	Retrieve data from the EO system (optional)	
4	Is the information retrieved from EO system sufficient and adequate?	If yes, go to step 5
		If no, go to step 6 (RFI)
5	Based on data retrieved, is it necessary to amend the PLACI data?	If yes, go to step 6 (RFI)
	E.g. if the name or address of consignor is different than originally indicated, that might create a new or different hit to the commonly agreed criteria	If no, issue AC
6	Issue a Request for Information (RFI)	

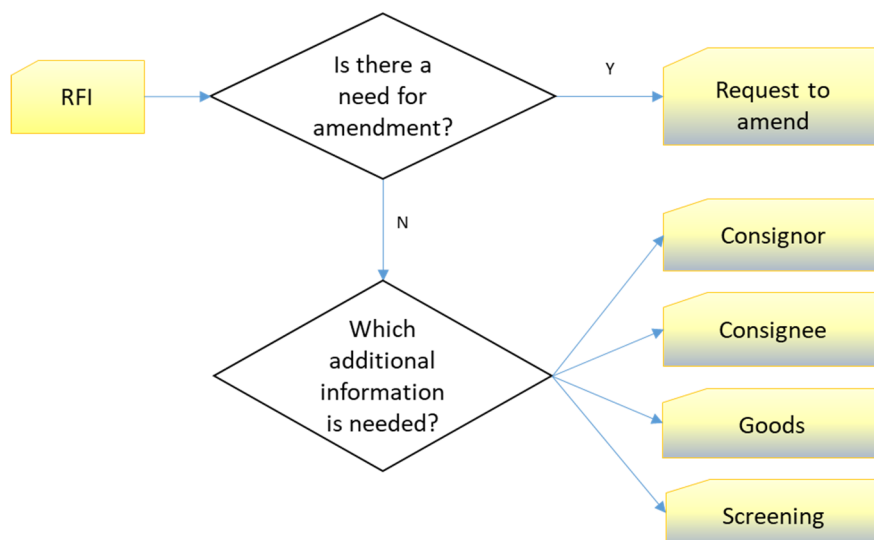*Figure 5: Regulator's process for issuing different types of RFI*

Step	Description	Next step
6	Request for information (RFI)	Go to step 7
7	Is an amendment of PLACI data necessary?	If yes, issue RFI type 'AMD' (amendment)
		If no, go to step 8
8	Which additional information is necessary?	Issue RFI type 'RFI' wit relevant code (see 4.4.4.3)

4.5 Request for Screening (RFS)

If additional evidence is required in order to determine whether a risk to aviation security exists, or when it is not possible to determine the risk with the information available (including additional information from a RFI, the customs authority will request the Economic Operator to perform screening in accordance with the applicable requirements for high risk cargo and mail (HRCM).

Although the EO may not in all cases be responsible for the actual performance of screening, the responsibility to ensure that the screening request is fulfilled remains with the EO. In such cases, therefore, the EO is responsible to contact the entity, operator or authority in charge of the screening activities at the relevant location so to ensure fulfilment of the request.

In accordance with the EU air cargo in-bound legislation[6], security controls, screening and high risk screening (HRCM) shall only be performed by EU designated ACC3 and RA3 operators using the means and methods for which they have been approved, as defined in point 6.7.3 and 6.7.4 of the Annex to Commission Implementing Decision C(2015)8005[7].

At locations waived from the application of the EU air cargo in-bound legislation[8], economic operators and entities, operators or authorities in charge of the performance of screening, shall at least refer to the means and methods described in the ICAO Aviation Security Manual, Doc. 8973, point 13.5.6[9].

When responding to the RFS request message, the Economic Operator shall either:

- Provide the confirmation that such screening had already been performed and the results thereof (alarm – no-alarm), or

- Perform screening (or ensuring its performance) and submit confirmation that screening has been performed and the results thereof (alarm – no-alarm)[10].

 While launching an RFS request message, the Customs authority may consider providing the reason for the referral to the operator to better inform it in determining which screening method is the most appropriate to address the potential risk. Whenever this is not possible due to the confidentiality of the information, the authority may, in exceptional circumstances, suggest a specific method of HRCM screening.

For consignments not yet/anymore located in the site of the Economic Operator, the appropriate authority and the operator should agree that the shipment be moved onto a location where the appropriate screening equipment is available.

4.5.1 Organisational and operational availability requirements

All actors need to provide necessary organizational and operational availability, as follows:

Customs authority as a sender of the RFS needs to provide:

- 24/7 availability.

- Operational availability and contact details of Customs (with national civil aviation authority depending on the national set up).

EO as a recipient of the RFS needs to provide:

- 24/7 centralized / single point of contact (depending on the business model) and availability.

- The EO needs to have established operational processes to respond to the request in a timely manner.

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[6] The ACC3 regime – point 6.8 of the Annex to Commission Implementing Regulation (EU) No 2015/1998

[7] Non-public information

[8] Non-public information

[9] Non-public information

[10] JWGACI GP set in the Appendix of this document.

- The follow-up shall be in compliance with the relevant civil aviation security provisions according to EU ACC3/RA3/KC3 regulation or the ICAO Aviation Security Manual Doc. 8973, point 13.5.6.[11], as applicable.

- EO needs to have in place necessary access to information providing screening results.

- Interfacing with the ICS2 or in the case of postal model, also interface between origin and destination DOs is compulsory, to support all required message exchange.

4.5.2 Language to be used

Whenever free text is used in exchanges, or during contacts between senders and recipients of requests, use of English language is strongly recommended (in particular to avoid situations where actors involved in the process would lose time due to a need to translate).

4.5.3 Request for screening message (IE3Q03)

4.5.3.1 Message IE3Q03 content

Occurs	ICS2 Name	UCC Name
	IE3Q03	
1..1	**Document issue date**	The date of the RFS request
1..1	**MRN**	Registration number of the ENS filing
1..1	**Responsible Member State**	
1..1	**Country**	Member State which is issuing the RFI
0..1	**Representative**	
1..1	**Identification number**	EORI number of the representative (if declared in the ENS filing)
0..1	**Transport document (House level)**	
1..1	**Reference number**	Reference number of the transport document (HAWB, postal item number (S10))
1..1	**Type**	Type of the transport document
1..1	**Declarant**	
1..1	**Identification number**	EORI number of the declarant
1..99	**Referral request details**	
1..1	**Referral request reference**	Unique identifier of the referral request
0..1	**Recommended HRCM screening method**	Codes 'AOM', 'CMD', 'EDD', 'EDS', 'ETD', 'PHS', 'VCK', 'XRY' will be used.
1..1	**Request type**	Default code 'RFS' will be used
0..1	**Transport document (House level)**	
0..1	**Reference number**	Reference number of the transport document (HAWB, postal item number (S10))
0..1	**Type**	Type of the transport document

4.5.4 Request for screening response message (IE3R03)

Due to the nature of a PLACI process (filing the data as early as possible), there may be operational reasons impeding the EO to respond in a timely manner. This is without prejudices to the assumption that cargo and mail won't be loaded on board until the RFS request has been responded to. On a case by case basis customs authority may decide to contact the EO for the status.

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[11] Non-public information

4.5.4.1   Message IE3R03 content

Occurs	ICS2 Name	UCC Name
	IE3R03	
1..1	**Document issue date**	The date of the RFS response
1..1	**MRN**	Registration number of the ENS filing
1..1	**Responsible Member State**	
1..1	**Country**	Member State which is issuing the RFI
0..1	**Representative**	
1..1	**Identification number**	EORI number of the representative (if declared in the ENS filing)
0..1	**Transport document (Master level)**	
1..1	**Reference number**	Reference number of the transport document (HAWB, postal item number (S10))
1..1	**Type**	Type of the transport document
1..1	**Declarant**	
1..1	**Identification number**	EORI number of the declarant
1..99	**HRCM screening results**	
1..1	**Referral request reference**	Unique identifier of the referral request
1..1	**Result**	Codes '1 - No alarm' and '2 – Alarm' will be used
2..9	**Screening method**	
1..1	**Method**	Codes 'AOM', 'CMD', 'EDD', 'EDS', 'ETD', 'PHS', 'VCK', 'XRY' will be used.
0..99	**Additional information**	Any additional information can be provided here
0..1	**Text**	
0..1	**Information type**	Default code 'R4' will be used
0..9	**Binary attachment**	eCSD can be attached to the response
1..1	**Identification**	
1..1	**Filename**	
1..1	**MIME**	
0..1	**Description**	
0..1	**Transport document (House level)**	
1..1	**Reference number**	Reference number of the transport document (HAWB, postal item number (S10))
1..1	**Type**	Type of the transport document

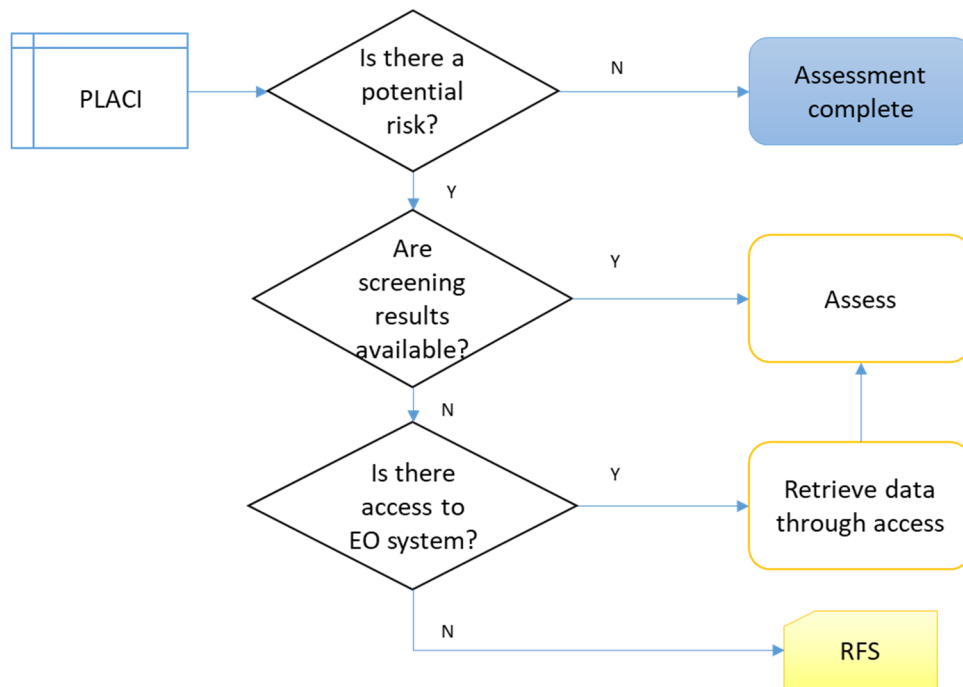## 4.5.5 Step by step Regulator (Customs) process overview

4.5.5.1   Issue RFS

Figure 6: Regulator's process for issuing RFS

Step	Description	Next step
1	Based on the PLACI data, is there a potential risk to aviation security?	If yes, go to step 2
		If no, issue AC
2	Is information regarding screening available, e.g. in common repository within the original PLACI filing (optional data) and sufficient?	If Yes, go to step 3
		If no, go to step 4
	If screening information is available, decide if this information is sufficient (remit of the targeter).	
3	Asses the information (see 4.5.5.2 Assess information (including screening information))	
4	Is access to the EO system available?	If yes, go to step 5
		If no, go to 6 (RFS)
5	Retrieve data from EO system	If yes, go to step 3
	Decide whether accessing the EO system might provide relevant screening information, decide if this information is sufficient (remit of the targeter).	If no, got to step 6
6	Issue a Request for screening (RFS)	
7	Notify carrier (not supported by the system)	

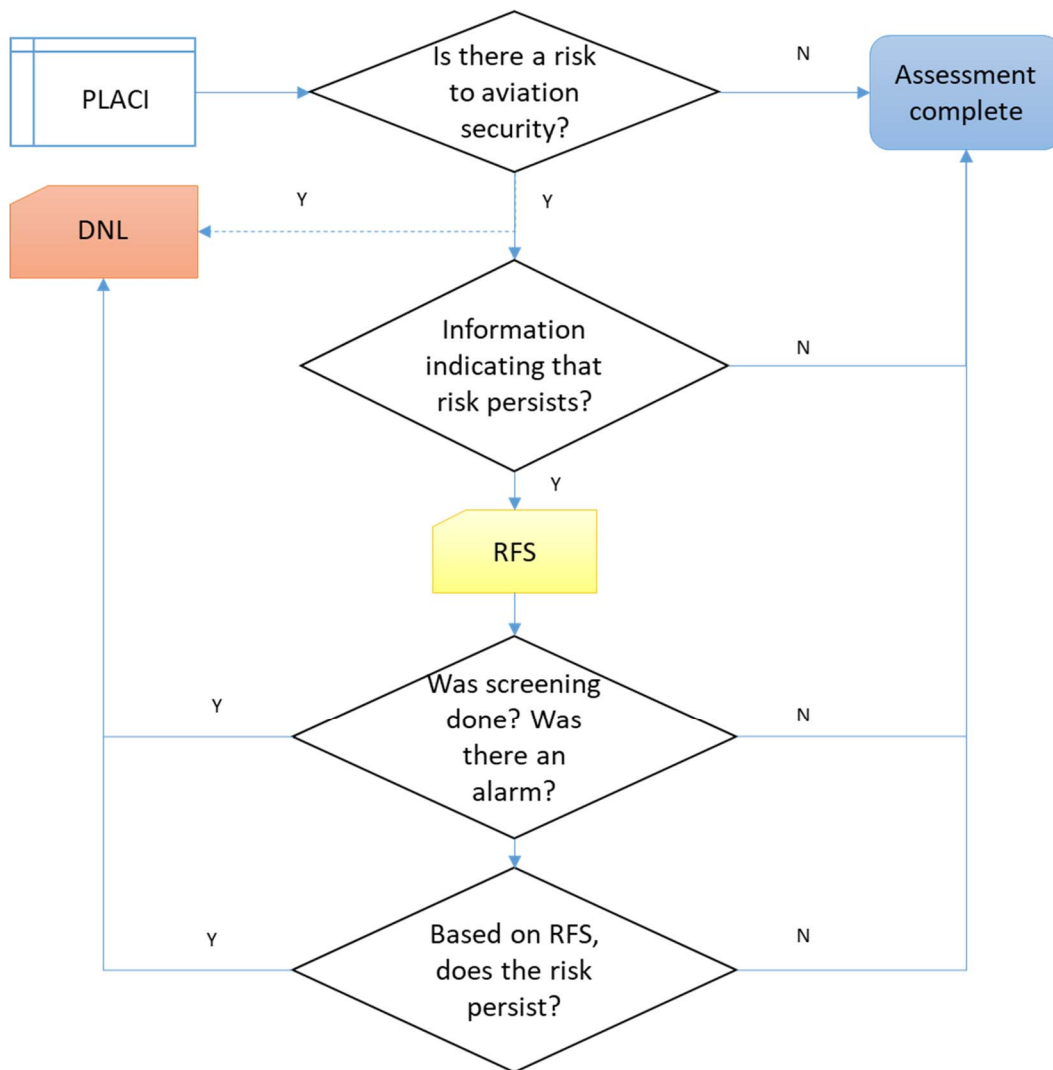### 4.5.5.2 Assess information (including screening information)

Figure 7: Regulator's process for assessing the information

Step	Description	Next step
1	Based on the PLACI data, relevant information of stakeholders (including the optional information on the performed screening), is there still a risk to aviation security?	If yes, go to step 2
		If yes, (alternatively) go to step 6 (DNL)
		If no, issue AC
2	Is there specific threat information available indicating that the risk persists irrespective of the HRCM screening performed? The economic operator will be informed what to look for. Providing the reason to the operator what to look for (i.e. ensuring that elements are provided enabling the operator knows what to look for) will help them to determine which screening method is the most appropriate to address the potential risk. Notification of sensitive details will take place outside the system, decided on a case by case basis.	Yes, go to step 3 (RFS)
		If no, issue AC
3	Send RFS	

4	Was screening done? Has there been an alarm?	If yes, go to step 6 (DNL)
		If no, issue AC
5	Based on the RFS, does the risk persist?	If yes, go to step 6 (DNL)
		If no, issue AC
6	Send DNL	

4.6 Do Not Load (DNL)

Do Not Load situation may occur in the following cases that trigger issuance of a Do Not Load order by the Member State (customs) authority via the specified message:

– Case 1: When advance cargo information matches to specific intelligence or threat scenarios that indicates an imminent threat to aviation security (i.e. 'bomb in a box'),.

– Case 2: if a threat item is identified in the cargo while in the process of resolving an RFS[12].

In accordance with the relevant applicable standard and recommended practices of Annex 17 and the Aviation Security Manual Doc 8973 of ICAO in respect of handling of unlawful interference[13], protocols must be in place to address instances of imminent threat to aircraft presented by an air cargo shipment.

All actors need to provide necessary organizational and operational availability, as follows:

Member State (customs) authority as a sender of the DNL needs to provide:

- 24/7 availability.

- Operational availability and contact details of customs, national civil aviation authority and/or other national authority involved in such case, depending on the national set up.

EO as a recipient of the DNL needs to provide:

- 24/7 centralized / single point of contact (depending on the business model) and availability.

- The EO needs to have established operational processes to respond to the DNL.

- Interfacing with the ICS2 or in the case of postal model, also interface between destination and origin designated operators is compulsory, to support the DNL.

4.6.1 Language to be used

Whenever free text is used in exchanges, or during contacts between senders and recipients of requests, use of English language is strongly recommended (in particular to avoid situations where actors involved in the process would lose time due to a need to translate).

4.6.2 Do not load request message (IE3Q01)

4.6.2.1 Message IE3Q01 content

Occurs	Data class/element	Explanation
	IE3Q01	
1..1	**Document issue date**	The date of the DNL request
1..1	**MRN**	Registration number of the ENS filing
1..1	**Responsible Member State**	
1..1	**Country**	Member State which is issuing the DNL
0..1	**Representative**	
1..1	**Identification number**	EORI number of the representative (if declared in the ENS filing)
0..1	**Transport document (House level)**	
1..1	**Reference number**	Reference number of the transport document (HAWB, postal item number (S10))

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[12] DNL issued in the process of resolving an RFS presupposes an immediate response by the EO.

[13] Annex 17 Chapter 5. Management of Response to acts of unlawful interference – Doc 8973 Chapter 17. Crisis Management and response to acts of unlawful interference - Non-public information

1..1	**Type**	Type of the transport document
0..1	**Declarant**	
1..1	**Identification number**	EORI number of the declarant
1..1	**Do not load details**	
0..1	**Transport document (House level)**	
1..1	**Reference number**	Reference number of the transport document (HAWB, postal item number (S10))
1..1	**Type**	Type of the transport document

4.6.2.2 Do not load details

This class will contain the reference number of the HAWB or the postal item number (S10) of the consignment for which the DNL is issued. Other house consignments covered by the same ENS filing for which no DNL is issued will not be affected and will get an AC.

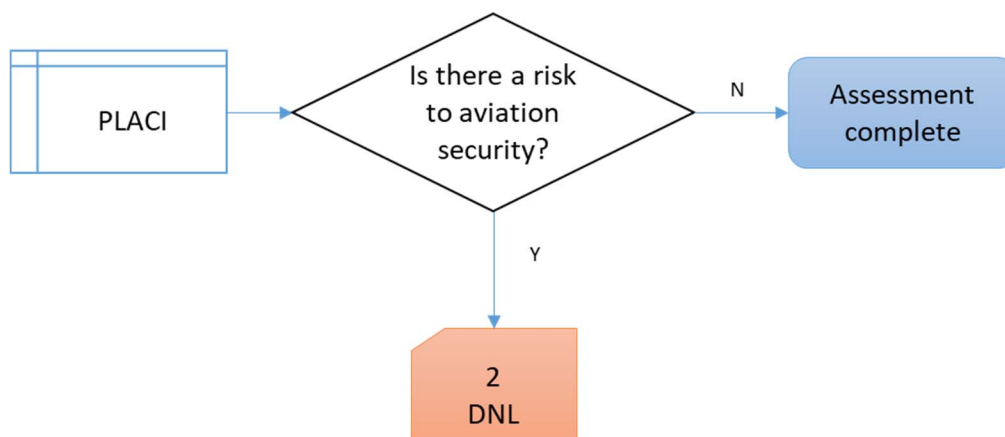## 4.6.3 Step by step Regulator (Customs) process overview

Figure 8: Regulator's process of issuing DNL

Step	Description	Next step
1	Is there an imminent threat to aviation security?	If yes, go to step 2 (DNL)
		If no, issue AC
2	Send DNL	
3	Notify carrier (not supported by the system)	

4.6.4 Procedures to follow when a DNL has been issued

4.6.4.1 Customs authority issuing the DNL

- The customs authority issuing the DNL hands over the responsibility to its national appropriate authority for civil aviation security.
- Contact with the EO will be established by the responsible national authority.

4.6.4.2 Recipient of the 'Do Not Load' notification

- Immediate localisation of the high risk consignment subject of the 'Do Not Load' notification should be established.

- Activation of all relevant emergency response protocols and security processes (i.e. security information to potential air carrier, other economic operator, cargo handling entity, etc.) should be ensured.

- Where appropriate and depending on the local circumstances, notification to the relevant (local security) authorities should be performed.

4.6.4.3 The appropriate authority/authorities identified by EU or national legislation

The authorities should perform the following activities:

- Assessment of possible further consequences of the identified risk, including targeting of consignments with similar characteristics through the EU-PLACI risk analysis process or other relevant instruments.

- Attempt to share risk information with all potentially involved economic operators, to allow for the rapid identification of similar risk.

- Coordination with other national authorities potentially involved in further risk mitigation.

- Assistance to the economic operator in the management of the 'do not load' notification situation.

- Coordination with the appropriate authorities of other EU Member States, directly or through European institutions (e.g., AVSEC regulatory committee).

- The appropriate authority for civil aviation of the MS will coordinate with the counterpart authority of the state in which the consignment subjected to a DNL notification has been identified and from where it originated.

5   FALL-BACK PROCEDURES (TO BE ELABORATED)

In case of system unavailability the same procedures will apply but without the support of the IT tools.

[Means of communications to be added after the BCP is established.]

6   APPENDIXES

6.1 Appendix 1: Postal processes

The purpose of this appendix to lay out the different steps to take in the case of postal model and is in line with the general guidance as provided above.

The stakeholders of the postal process are the following:

–   Customs at Origin

–   Customs at Destination

–   National Civil Aviation Authorities

–   Airlines

–   Origin Posts

–   Destination Posts

–   Any stakeholder involved in the supply chain (GHA, customs broker, General sales agents)

For simplicity purposes, the following **terminology** is used in the document:

–   Postal operator in the origin country: DO O

–   Customs in the origin country: Customs A

–   Postal operator in the destination country: DO D

–   Customs in the destination country: Customs B

–   Postal item or postal good has the meaning of a 'House consignment' (Customs/AVSEC). Postal consignment has the meaning of a 'Master consignment'.

6.1.1 Step by step guidance to Posts in <ins>non-EU</ins> countries:

1.   **Provide ITMATT to Destination Post asap**

•   Before sending ITMATT messages to DO D, DO O should check that:

  o   The minimum required '7+1' data elements have been completed in accordance with the EU technical specifications;

  o   Any necessary documents which could be are available to justify the nature of the shipment ;

  o   The structure of the message is aligned with the recommendations of the UPU standards in order to comply with the expected data quality ;

  o   In accordance with the UPU convention, the language used in the ITMATT message is:

    –   English

    –   or French

    –   or the language of the country of Destination[14]

•   Different timelines could be considered to transmit data depending on the type of the flow:

  o   B2C (eCommerce) and B2B data shall be transmitted as soon as available. In these cases, ITMATT messages could be transmitted before the physical entry of the good in the supply chain. The origin post must subsequently ensure that the item has effectively been received in the postal supply chain (goods to follow the data).

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[14]   Transliteration foreseen in ICS2 Release 2.

> o C2C ITMATT data can only be transmitted at the soonest in the post office (OCR technology, picture based capture, electronic form) and at the latest at the Outbound Office of Exchange (OE).

2. Waiting time for responses from Customs B

As for some responses more time will be taken, the postal operator may wish to keep items aside for 120 minutes based on the operational context, including where ITMATT data has been transmitted late. This is without the prejudice to the possible case where the RFI, RFS or DNL may be issued at a later stage and the postal operator will need to provide an adequate response.
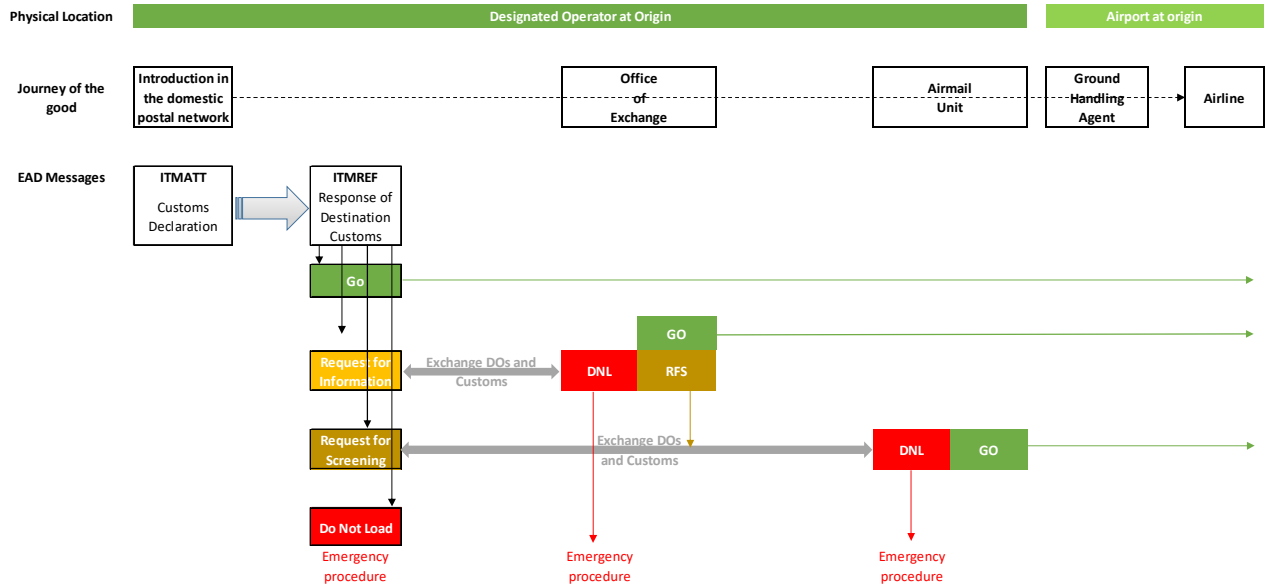
3. Nesting

- Scan each item identifier (S10 barcode) and check the operational IT-system whether Assessment Complete message has been received or not.

- If IT-system receives an assessment complete (AC) the item can be nested.

- Items shall be removed from shipments if IT-systems indicates:

   o 'Request For Information'

   o 'Request For Screening'

   o 'Do Not Load'

   o 'No AC response received yet'

Important message: Nesting of items with assessment complete <u>only</u>.

4. Create PREDES message and transmit to Destination Post

5. Handling of Referrals messages

a. RFI message (Request for Information)

When processing RFI request, the DO O should ensure they have sufficient levels of competency to manage the different requests in text format.

- DO O receives a RFI message to <u>amend initial data</u>:

   o Example: 'ZZZZZ' is the name of the City;

   o DO O may check other IT system to verify relevant data element or try to contact the sender in order to ask for the correct value;

   o If correct value has been identified, ITMATT data shall be modified and transmitted again to the DO D.

- DO O receives a RFI message to add information:
    - Example: provide telephone number;
    - DO O shall contact the sender in order to gather relevant additional information;
    - If additional information has been collected, the data shall be key entered into the RFI response form and be transmitted to the destination Post immediately.

- DO O receives a RFI message to provide extra documents (other than CSD):
    - Example: Invoice for commercial shipments;
    - Operator A shall contact the sender in order to collect relevant document;
    - If document has been collected (for example as PDF), it shall be attached to RFI response message and be transmitted immediately to the destination Post.

- DO O receives a RFI message to provide a copy of an CSD[15] (can you provide, when available):
    - Certain DO O already perform aviation security screening early in the process; in such cases, a CSD can be provided at consignment level.

- If no information can be collected after a reasonable timeframe (2 hours), DO O shall indicate this status in the RFI response form and transmit the RFI response to DO D in order to inform Customs B.
- If no information can be collected at all, DO O may indicate this status in the RFI response form and transmit the RFI response to DO D.
- Wait for Assessment Complete after RFI response was transmitted:
    - Only when Assessment Complete was received an item shall be loaded onto an aircraft;
    - Additional RFI, RFS or DNL messages may follow.

b. RFS message (Request for Screening)

- A RFS message shall be sent by Customs B only in cases whether a High Risk Cargo and Mail screening procedure is needed to complete the initial risk assessment;
- This request is in line with the EU and international AVSEC legislation.

- Postal items of this type must be screened according to specific instructions. DO O must have procedures in place to ensure that high-risk cargo and mail screening can be performed. (The origin post needs to have procedures in place to address potential RFS by ensuring the required screening). The consequence of failure would be that the airline would not accept this shipment (unless HRCM screening capabilities).

- After screening, the RFS response message shall be filled out and be transmitted to DO D in order to inform Customs B about screening results.
- The HRCM screening shall be performed only by an entity, operator or air carrier that fulfils the EU AVSEC legislation.
- Wait for Assessment Complete after RFS response was transmitted

    - Only when an 'Assessment Complete' message has been received, the item shall be loaded onto an aircraft.

c. DNL message (Do Not Load)

- DNL is always an emergency, a potential bomb in a box. It requires the deployment of emergency procedures in accordance with the rules of the postal facilities. When this happens, it is essential that all stakeholders on both sides of the global postal supply chain are informed.

- The communication must be done in 2 steps:
    - 1st step: Customs B warns urgently:

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[15] There is no hierarchy of referrals as pointed out before. Hence an RFI can theoretically appear after an RFS.

- DO D to intervene alerting DO O;

- Competent authorities in Country O may expedite an investigation to trace the origin of the postal item back to its sender.

  o 2nd step: DO O must make every effort to identify the postal item 'implicated' as soon as possible, at the level of the facility where the item is stored, by applying the procedure of isolation of the item, and the procedure of protection of personnel and facilities. It could be envisaged to establish a parallel communications plan with all facilities, which have been involved in the routing of the postal item in question.

6. Agreement with Airlines

- Foresee a bilateral agreement with airlines which would need to be informed that consignments have received an assessment complete for postal items included in the shipments.
- Standard communication protocols and/or business procedures need to be in place between airlines and designated operators, to be able to inform and prompt an action by the air-carriers of the late arrival of an RFS and DNL. It is possible that a designated operator receives an RFS or DNL after a Mail Consignment has been handed over to the air-carrier.

6.1.2 Step by step guidance to Posts <u>in EU countries</u>

1. Receive ITMATT messages

2. Convert ITMATT messages into F43 messages and transmit to destination Customs

- Recommendation: put all available ITMATT data (optional data elements) into the F43 message in order to reduce the number of potential RFI, RFS.

3. Where you receive Referrals (example: RFI)

- Assess whether RFI may be resolved already at Destination (example: IT-System at Post@Destination creates wrong values in F43);
- If the request can be resolved, fill out the new F43 and transmit it again to the destination Customs.

4. Forward Assessment complete, RFI, RFS, DNL as the case may be to Origin Posts)

5. Receive RFI/RFS Responses or second ITMATT messages

6. Send responses (cf. 5) to destination Customs

7. Receive PREDES messages

8. Transform PREDES into F44[16] messages and transmit to destination Customs

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[16] In the case PREDES includes **only** items of correspondence for which there is an exemption to file the ENS data according to the customs provisions in force, F44 message is not required

6.1.3 Map of processes

6.1.3.1 Operational processes

The two diagrams below show the journey of a postal item along the supply chain, from when it enters the network until it is delivered to the recipient. The diagrams also show the associated messages, which enable tracking of:

- items exchanged between postal operators (EMS events or EMSEVT[17]);

- dispatches (PREDES, RESDES) and consignments (PRECON, RESCON) exchanged between postal operators;

- Consignments when containers are handed over between postal operators and airlines (CARDIT, RESDIT).

The most important point to be drawn from the two diagrams is that it is technically possible for postal operators to track an item all along the supply chain through EMSEVT messages, as long as they have the necessary IT tools and information systems. This has already been put into practice for certain types of flows, such as EMS and parcel flows. The UPU is working on applying this procedure to flows of small packets containing goods.
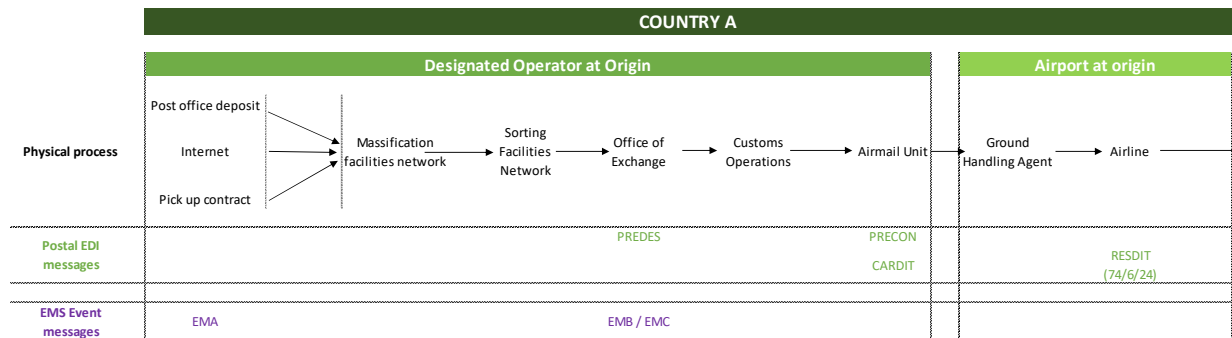

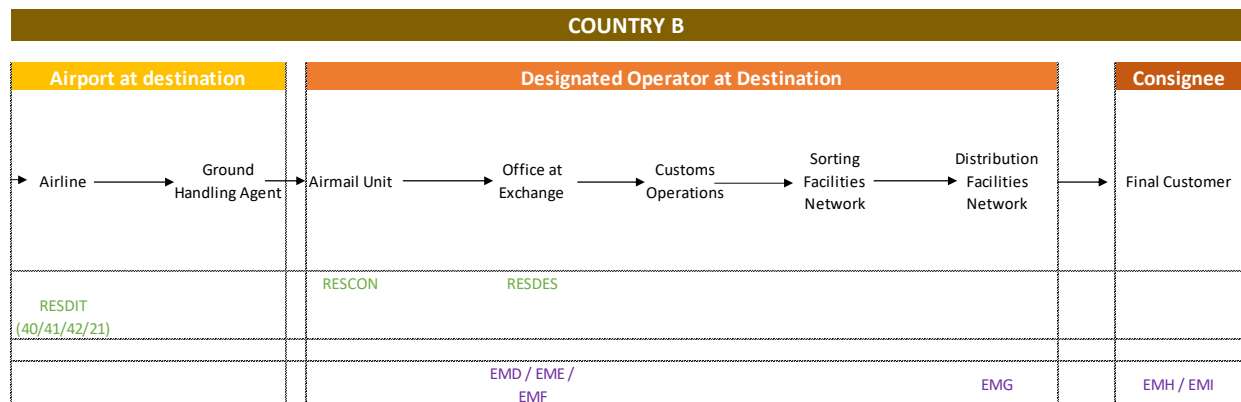*Figure 9: Process in country A*

Figure 10: Process in country B

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[17] EMSEVT – general track and trace system.

6.2 Appendix 2: JWGACI guiding principles

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