



Notice to Regulated Agents 1/2025

Guidelines on Strengthening Compliance with the Regulated Agent Security Programme

The Civil Aviation Department (CAD) adopts a risk-based approach on the regulatory oversight on Regulated Agents (RAs) to ensure the continuous compliance with the [Regulated Agent Security Programme](#) (RASP), the [Handling Procedures for RAR](#) and other relevant requirements. Attention of the Person-in-charge (PIC) and Nominated Persons for cargo security (NPs) of RAs is drawn to the aspects highlighted hereunder in addition to the reminders recapped in Notice to RAs [1/2023](#) and [1/2024](#).

Common Issues Observed in Inspections

2. Every entity in the air cargo supply chain plays an equally vital role in safeguarding a secure air cargo operation. Apart from the physical handling of shipments, it is crucial for RAs to meticulously prepare and maintain shipping documents. This is not only for the traceability and accountability of each shipment, but also to provide necessary information for cargo acceptance and security screening. The most common issues on implementing the requirements of the RASP and Handling Procedures for RAR identified are summarised below for the RAs' attention:

- (i) Accuracy of data and maintenance of *Shipper's Letter of Instruction (SLI)*;
- (ii) Completion of *Form of Undertaking for Inter-RA AWB Handling (FoU)*;
- (iii) Update to *Regulated Agent Aviation Security Declaration for Inter-RA Handling (RAASD)*;
- (iv) Completion of regular self-assessment;
- (v) Maintenance of templates of Job Application Form and Interview Record;
- (vi) Maintenance of internal security awareness training records of contractors; and
- (vii) Renewal and maintenance of Warehouse and/or Transportation Contractor Declarations.

3. The observations and relevant requirements, together with the recommended practice(s) to ensure the compliance, are summarised in **Attachment 1** to this notice. The PIC and NPs of RAs are reminded to go through them in detail and are strongly urged to adopt the recommended practice(s). **Failure to comply with the requirements of the RASP and/or the Handling Procedures for RAR may lead to suspension or deregistration of the company's RA status.**

4. In addition, the CAD has observed a number of cases of **not having any qualified persons to take up the position of Nominated Persons for Cargo Security (NPs)** which is a **major deficiency**. These cases were handled in accordance with Notice to RAs [6/2021](#). RAs are reminded to regularly check the validity of the RAR Training Certificates and/or RA Revalidation Test Results of the NPs, and timely arrange their staff to (i) complete a RA Security Training Programme or (ii) attend the RA Revalidation Test organised by the CAD in order to extend the validity of the RAR Training Certificate and/or RA Revalidation Test Result. The PIC and NPs of RAs should utilise the self-assessment checklist and double-check the validity of the RAR Training Certificates and/or RA Revalidation Test Results when completing the checklist.

Monitoring on Warehouse and Transportation Contractors

5. When RAs engage warehouse and/or transportation contractors in physical acceptance, processing, storage and/or transportation of air cargo, **it is the responsibility of the PIC and NPs of RAs to monitor the performance of warehouse and transportation contractors** even if the contractors are registered as Regulated Air Cargo Screening Facilities (RACSFs) in accordance with *Section 8.1 and 9.1 of RASP*, and ensure the contractors comply with RAR requirements on warehouse, transportation and personnel security.

Reporting of Non-compliance

6. To uphold aviation security and safety which is the basis for a sustainable business environment, each stakeholder in the air cargo industry is responsible to exercise due diligence in carrying out their roles in order to ensure a robust and secure supply chain for air cargo. Everyone in the air cargo industry is obliged to actively prevent or combat any malpractices and irregularities which may give rise to any concerns about air cargo security, and has a duty to report them to the concerned person or party. For this purpose, any suspected non-compliance with the RASP and/or RACSF Security Programme or any other issues of aviation security concerns should be reported to the CAD via the following means: -

- (i) by email to rar@cad.gov.hk or racsf@cad.gov.hk; or
- (ii) by post to Level 5, Office Building, Civil Aviation Department Headquarters, 1 Tung Fai Road, Hong Kong International Airport, Lantau, Hong Kong SAR.

7. The following information is suggested to be included in the report to enable follow-up action:

- Name and code of the RA/RACSF with suspected non-compliance;
- Capacity of the person who makes the report (e.g. RA's staff or contractor's staff)
- Subject of the non-compliance (e.g. warehouse security, security screening, cargo processing, transportation security);
- Details (with date, time and location) of the non-compliance;
- Details of the related consignments (e.g. MAWB/HAWB Number, Screening

Date/Time, Departure Date/Time from the RACSF, Flight Number, Flight Date, Air Carrier, Destination);

- Supporting Photos / Images / Documents showing the non-compliance; and
- Contacts of the persons who reports the non-compliance (e.g. Name, Contact Number / Email)

[Note: All information will be kept strictly confidential and used by the CAD only for follow-up on the report.]

Enquiries

8. For enquiries about this notice, please contact the CAD at 2910 6880 during office hours (09:00 – 12:00; 14:00 – 17:00) daily, except Saturday, Sunday and public holidays.

[Note: RAs can access the *RASP* and *Handling Procedures for RAR* in full via the links provided in the notice.]

March 2025

Aviation Security Section

Airport Standards Division

Civil Aviation Department

Reminders to Regulated Agents (RAs) about Common Non-Compliance with RA Security Programme (RASP) Observed and the Recommended Practices

Consignment Documentations

1. Accuracy of Data and Maintenance of Shipper's Letter of Instruction (SLI)

1.1 The CAD has observed that some RAs **did not maintain SLI for each consignment of air cargo, or did not ensure the information provided in the SLI were accurate or duly completed.** Being the major entity that interfaces with shippers, RA shall either **obtain the SLI or sufficient and accurate information from shippers for preparation of the SLI** in order to enable the completion of a proper cargo acceptance procedure specified in *Section 7(b) of RASP* and the *Handling Procedures for RAR Part A Section 2.2*. The SLI shall contain at least the **nature or content** of the consignment, **quantity of the consignment (including weight, number of packages, dimension / volume)**, and be maintained for at least 31 days after the consignment is flown.

1.2 Where RAs assist the shippers in the preparation of shipping documents such as SLI, for their interest, the Person-in-charge (PIC) and Nominated Persons for cargo security (NPs) of RAs are strongly recommended to retain the records (such as emails) of seeking the required information or confirmation that the information in the documents are correct from the shippers, as supportive evidence in case of investigation.

2. Completion of Form of Undertaking for Inter-RA AWB Handling (FoU)

2.1 It was noticed that some RAs were still not clear on the definition of the two options in Section II of the FoU and made wrong selections when completing the FoU. The selection of known or unknown cargo shall be based on the security status of the cargo consignment when it is tendered to a cargo terminal operator, i.e. **select "known cargo" only if the cargo consignment has passed security screening at a screening operator accepted by the CAD such as a Regulated Air Cargo Screening Facility (RACSF), otherwise, select "unknown cargo"**.

2.2 There were also instances where the FoU was signed by RA staff other than PIC or NPs. RAs are reminded that the FoU shall be **signed by PIC or NP** and lodge the FoU to the AWB assignor **before date of flight**. The template of the FoU can be found in the *Handling Procedures for RAR Annex 4c*.

3. Update to Regulated Agent Aviation Security Declaration for Inter-RA Handling (RAASD)

3.1 RAs shall lodge the RAASD for inter-RA handling as per the *Handling Procedures for RAR Part A Section 3.1 and 3.2*. However, some RAs did not lodge new RAASD to partnering RAs after relocating to a new address, or notify the partnering RA of its change of RA status. The PIC and NPs of RAs are reminded that the declaration is a one-time statement for a specific address, hence they are required to timely update their partners whenever there is any **change to the company address**, and to honour the declarations including immediately **notifying the partnering RA once its RA status is removed from the CAD Register**. The template of the RAASD can be found in the *Handling Procedures for RAR Annex 4a*.

Regular Self-Assessment

4. Completion of Regular Self-Assessment

4.1 It came to the CAD's attention that some RAs did not truly and accurately assess its compliance with the requirements specified in the self-assessment thus missing the earliest opportunity to spot out major deficiencies and take immediate remedial actions. The self-assessment checklist aims to assist RAs in identifying any internal deficiencies or security procedures that are not being properly implemented or that may require enhancement with respect to the RAR. The PIC and NPs of RAs are reminded that **the self-assessment should be completed with due effort based on the actual circumstances and practices** to best reflect the compliance against *RASP, Handling Procedures for RAR*, notices and any other directions given from time to time by CAD as part of the internal quality control measures. Self-assessment shall be conducted **at least once every two years with the record maintained for three years** for inspections by the CAD as required in *RASP Section 13(a)*. The template of the self-assessment checklist is available at the CAD website:

<https://www.cad.gov.hk/english/newrarform.html>

Job Application Form and Interview Record

5. Maintenance of Templates of Job Application Form and Interview Record

5.1 The CAD noticed that some RAs did not maintain a template of job application form and interview record, explaining that there was no plan for recruitment. It shall be stressed that **maintenance of a template of job application form and interview record is part of RAR requirement regardless of manpower planning**. The PIC and NPs of RAs shall ensure the maintenance of an up-to-date template that includes the instructions and declarations required in *RASP Section 11(a)* for job application form and *Section 11(b)* for interview record.

5.2 In order to ensure that no periods were unaccounted for in the past five years of the job applicant's experience, RAs are advised to instruct the job applicants to **indicate at least month**

and year for the start and end of each piece of experience. Any gaps identified should be verified with the job applicant with remarks or explanation marked on the job interview record to demonstrate to the CAD during inspections that the requirement specified in *RASP Section 11(b)(iii)* was complied with.

Internal Security Awareness Training Record of Contractors

6. Maintenance of Internal Security Awareness Training Records of Contractors

6.1 Some RAs did not to maintain the internal security awareness training record of warehouse and/or transportation contractor(s) staff. It is the responsibility of the RAs to ensure that all staff of the contractor(s) with access to consignment designated as air cargo and/or related shipping documents received initial and recurrent training to understand the principles of the air cargo security regime in Hong Kong (including RAR) and requirements for RA. For the training conducted by a trained person of the contractor, **the PIC and NPs of RAs shall obtain and maintain the training record(s) as well as the certification of the trainer(s) valid at the time of training** to demonstrate that the trainer(s) is/are competent to provide such training.

Warehouse and/or Transportation Contractor Declarations

7. Renewal and Maintenance of Warehouse and/or Transportation Contractor Declarations

7.1 The CAD also observed that some RAs **did not renew the Warehouse and/or Transportation Contractor Declaration every two years, or even maintain the declarations at all**, which is important for fulfilling the requirements of recurrent background check on contractor(s)' staff. The PIC and NPs of RAs shall ensure that the declarations are duly completed as required by the *RASP Section 8.1(c)(v) and Section 9.1(c)(v)*, and provide the latest declaration template to their warehouse and transportation contractors for their completion, where applicable, every two years and maintain the duly completed declarations for CAD's inspection.

7.2 If there is any third party involved in the warehouse or transportation service provided to the RA, i.e. a sub-contractor, **the third party shall also sign the applicable declaration with the RA** to confirm that security procedures specified in the RASP shall be adhered to or have been complied, as its staff will also have access to the consignment designated as air cargo and/or related shipping documents. The PIC and NPs of RAs are recommended to clearly explain to their warehouse or transportation service contractor(s) the rationale and need for obtaining the necessary declarations from their sub-contractor(s).

7.3 The contractor declarations are available at the CAD website:

<https://www.cad.gov.hk/english/newrarform.html>