



Notice to Regulated Agents 2/2025

Reminders on Inter-Regulated Agents Handling

The regulated agents (RA) play an essential role in the secure supply chain. While it is an existing common practice for RAs to engage other RAs in their operation in the form of co-loading or Master Air Waybill (MAWB) assignment, RAs' compliance with the [Regulated Agent Security Programme \(RASP\)](#), [Handling Procedures for RAR](#) and other relevant requirements in the course of inter-RA handling is crucial for ensuring a secure supply chain and safe transport by air. Attention of the Person-in-charge (PIC) and Nominated Persons (NPs) for cargo security of RAs is drawn to the aspects highlighted hereunder on their responsibilities in the inter-RA handling.

Inter-RA Handling

2. The major inter-RA handling in the air cargo industry can be generalised into co-loading and MAWB assignment. RAs may involve in inter-RA handling due to various operational and commercial reasons. However, it is important to remind all PIC and NPs of RAs that they shall **form an audit trail of the security status of each consignment and produce it to the next downstream entity** along a secure supply chain. All RAs involved in inter-RA handling are required to observe and follow the procedures as mentioned in the *Handling Procedures for RAR Part A Section 3*. In particular, the following requirements are highlighted for the attention of all RAs involved in the inter-RA handling:-

- (a) **Present accurate and complete information in the shipping documents** such that the receiving party, such as RA (MAWB assignor) in MAWB assignment or RA (receiving) in co-loading, has a clear and full picture of each consignment.
- (b) **Ensure unknown (UNK) cargo has undergone security screening** prior to acceptance as known (SPX) cargo as per *RASP Part II Section 8.3(b)* and Notice to RAs [1/2023](#) on security screening of cargo. RA (MAWB assignee) or RA (tendering) should respond to any request for an open-box check, or provide assistance to consult the shippers, as appropriate, for clarifications on any doubts, e.g. due to presence of high-density items or identification of possible threat items. Cargo not cleared by the security screening shall be rejected and not be assigned a SPX status.
- (c) **Fill and sign the Regulated Agent Aviation Security Declaration for Inter-RA Handling (RAASD) and Form of Undertaking for Inter-RA AWB Handling (FoU)**

(for MAWB assignment only) to declare the consignments will not contain any explosive or incendiary device and are protected to the RA (tendering)'s or RA (MAWB assignee)'s best endeavour against unauthorized interference during preparation, storage and transportation, and the compliance with the inter-RA handling procedures laid down in the *Handling Procedures for RAR Part A Section 3*. A template of the RAASD and FoU has been provided in the *Handling Procedures for RAR Annex 4a and 4c* respectively and are in Attachment 1 and Attachment 2 to this notice for easy reference.

- (d) **Retain documents** in accordance with *Handling Procedures for RAR Part A Section 2.3* for traceability of the secure status of the consignments and accountability. RAs are also reminded to observe the common issues regarding the furnishing of FoU and RAASD as mentioned in Notice to RAs 1/2025.

3. Apart from the requirements on inter-RA handling highlighted in para. 2, it should also be emphasized that **all entities involved in the secure supply chain, including the contractors of RA and RACSF**, shall fully understand their respective **responsibilities in ensuring air cargo security**. **Warehouse and transportation contractors of RAs** (such as RACSFs), and **cargo processing, transportation, and screening service contractors of RACSFs** if so engaged, shall sign the respective contractor declarations to indicate their understanding of their obligations and comply with the aviation security requirements laid down therein. **The RAs and RACSFs shall ensure that the corresponding contractors' declarations are properly signed and retained**, and regularly monitor and review the performance of the contractors they engaged. Templates of the contractor declarations are available on CAD website at:

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

RACSF Contractors: https://www.cad.gov.hk/english/icao2021_form.html

4. It must be reminded that in the event of an occurrence or if non-compliance is observed in respect of a specific MAWB, the issuing carrier's agent, who can be the RA (MAWB assignor) or RA (receiving), may be held responsible for the deficiencies found under the existing regulatory regime, and also ultimately to the aircraft operators. Based on feedback and suggestions from the industry, **apart from the corresponding contractors' declarations mentioned in para. 3 to requiring the contractors to comply with the aviation security requirements**, the issuing carrier's agents are suggested to consider **incorporating appropriate provisions in their consignment arrangements (e.g. contracts) to define clearly the liabilities of the respective RA (MAWB assignee) or RA (tendering)** in inter-RA handling to minimise the chance of possible disputes in the event of occurrences. For instance, if deemed viable, the issuing carrier's agent should consider incorporating additional practicable requirements and specific instructions that may be unique to a consignment or overall handling arrangement, in addition to those specified in RASP and Handling Procedures for RAR, on

- (a) security screening;
- (b) cargo processing such as consolidation and palletization; or
- (c) other operational arrangements,

to RAs involving in the MAWB, including the Regulated -Air Cargo Screening Facilities (RACSFs) engaged by these RAs.

5. Accordingly, the RA (MAWB assignee) or RA (tendering) in co-loading are reminded to scrutinise their shipping documents for any misrepresentation of information, misdeclaration or undeclaration that is against the interest of the RA (MAWB assignor) or RA (receiving), as the RA (MAWB assignee) or RA (tendering), together with the screening service providers such as RACSFs they engaged, may be liable to the loss sustained by the RA (MAWB assignor) or RA (receiving) in accordance with the established agreements and be held responsible for deficiencies such as tendering any cargo not cleared by security screening as known cargo under the existing regulatory regime.

6. **Major deficiencies which are of significant aviation security implications and / or impair the agent's capability as an RA will lead to suspension or deregistration of the company's RA status.** The CAD will continue to closely monitor the situation, and if need be, further enforcement actions will be taken and enhancement measures will be introduced to ensure air cargo security and safety. The CAD looks forward to the continuous collaboration with stakeholders and the air cargo industry in this regard to achieve a secure supply chain and safe transport by air.

Enquiries

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

[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

**Regulated Agent Aviation Security Declaration
For Inter-Regulated Agent Handling**

1. On behalf of _____(Name of Regulated Agent) I, the undersigned, confirm that, unless otherwise stated, all consignments of goods consigned for carriage by air by *me/my company to_(Name of Receiving Regulated Agent) will not contain any explosive or incendiary device and are protected to my best endeavour against unauthorized interference during preparation, storage and transportation.
2. I agree that the packaging and contents of the consignments may be examined for security reasons.
3. I agree that I shall immediately notify____(Name of Receiving Regulated Agent) once my RA status is removed from the CAD Register.

Regulated Agent Code registered under the Civil Aviation Department	
Name of Person-in-Charge / Nominated Person for Cargo Security (Full Name in Block Letters)	Signature & Company Chop
Position	Date
Company Address[^]	

[^]This is a one-off declaration which is **site-specific**. If the company address is changed, the RAASD should be updated and the new declarations should be lodged to partnering RAs.

* Delete as appropriate

Form of Undertaking for Inter-RA AWB Handling

Section I

I, for and on behalf of

_____ (company name of **MAWB assignee** regulated agent)
_____ (RA code)

hereby declare to

_____ (company name of **MAWB assignor** regulated agent)
_____ (RA code)

that in order to use the Master Air Waybill (MAWB):-

Master Air Waybill Number: _____

borrowed from the above named MAWB assignor, I will follow the procedures set out in Section II for tendering the air cargo consignment under the above Master Air Waybill.

Section II

**Tick the appropriate box(es).*

The cargo consignment under the above MAWB will be tendered to a cargo terminal operator as*:

- known cargo (i.e. cargo consignment with security status “SPX”) and I will follow the procedures as required in Part A Section [3.2.4](#) of the Handling Procedures for Regulated Agent Regime.
- unknown cargo (i.e. consignment with security status “UNK” or without any security status) and I will follow the procedures as required in Part A Section [3.2.5](#) of the Handling Procedures for Regulated Agent Regime.

Section III

Full Name

(in block letter): _____

Position in Company: _____

Signature and

Company chop: _____

Date: _____

Note: 1 This Declaration shall be completed and signed by the Person-In-Charge or the Nominated Person for Cargo Security of the MAWB assignee regulated agent.

2 The original of this Declaration shall be retained by the MAWB assignor regulated agent with a copy provided to MAWB assignee regulated agent.