UPU UNIVERSAL POSTAL UNION

“Do not load” (DNL) guidance document

Table of contents Page

1	**Purpose**	**3**
2	**Terms and definitions**	**3**
3	**Background**	**4**
4	**Data communications**	**5**
5	**Proposed PLACI risk response process**	**5**
6	**Annexes**	**8**
7	**References**	**14**

1 Purpose

One of the objectives of the UPU's Postal Security Group (PSG) is to enhance the security of all operations within the postal sector. The PSG, in collaboration with other UPU stakeholders, has defined a minimum set of security requirements that can be applied to all facets of the postal sector. Developing measurable standards of security for the postal sector helps to protect postal employees, assets and postal items in general, contributes to the security of the modes of transport used to carry mail items, and enables national and international authorities to apply risk assessment tools.

The physical and procedural security standards developed under the auspices of the PSG are applicable to critical facilities in the postal network. A critical facility is defined within this context as an office of exchange, an airmail unit, postal facilities where aviation security screening is completed, or the final postal facility through which mail items transit prior to dispatch by air.

These security standards, which are indispensable for the application of this document, are as follows:

– S58, Postal security – General security measures: This standard defines the minimum physical and process security requirements applicable to critical facilities within the postal network;

– S59, Postal security – Office of exchange and international airmail security: This standard defines the minimum requirements for securing operations relating to the transport of international mail.

The purpose of this document is to provide general guidance, principles and a risk assessment response protocol to define the role of designated operators within the Joint World Customs Organization (WCO) and International Civil Aviation Organization (ICAO) Guiding Principles for Pre-Loading Advance Cargo Information (PLACI) system in those member countries that choose to implement that regime. This document expands on the scope of high-risk mail, which is covered in detail in S59. The definition of high-risk cargo and mail, as per the ICAO Aviation Security Manual (Doc. 8973), includes items where specific intelligence indicates that the cargo or mail poses a threat to civil aviation.

The Joint WCO–ICAO Guiding Principles for PLACI document (hereinafter the "PLACI document") has been endorsed through the ICAO Aviation Security Panel Working Group on Air Cargo Security (WGACS). The PLACI document developed by this group provides a harmonized approach for aviation authorities and air cargo security and industry stakeholders. It is incumbent upon each country to decide whether or not to implement a PLACI system. PLACI is not part of ICAO Standards and Recommended Practices; it is an additional layer of security and does not supplant physical screening processes. As is currently the case, the requirements of the national civil aviation security programme applicable in each member country must be adhered to, along with ICAO Annex 17.

The PLACI document should be comprehensively reviewed and a harmonized approach adopted by all aviation authorities and air cargo security and industry stakeholders prior to a PLACI regime being implemented.

2 Terms and definitions

Designated operator (DO) – Any governmental or non-governmental entity officially designated by a UPU member country to operate postal services and to fulfil the related obligations arising from the UPU Acts on its territory.

High-risk cargo or mail (HRCM) – Cargo or mail presented by an unknown entity or showing signs of tampering shall be considered high-risk if, in addition, it meets one of the following criteria:

a Specific intelligence indicates that the cargo or mail poses a threat to civil aviation; or

b The cargo or mail shows anomalies that give rise to suspicion; or

c The nature of the cargo or mail is such that baseline security measures alone are unlikely to detect prohibited items that could endanger the aircraft.

Regardless of whether the cargo or mail comes from a known or unknown entity, a member country's specific intelligence about a consignment may result in the cargo or mail being considered high-risk.

Improvised explosive devices (IEDs)/Improvised incendiary devices (IIDs) – A simple bomb made and used by unofficial or unauthorized forces.

Item/mail item/mailpiece/postal item – An indivisible mailable entity in respect of which a mail service contractor accepts an obligation to provide postal services.

Note 1. – "Indivisible" relates here to treatment within the postal system: items should be handled and delivered as an integrated unit and not split into components within the postal system.

Note 2. – Mail items are often qualified according to size, weight, handling or other service characteristics. Examples include letter mail (items), parcel post (items), registered mail (items), etc. Where no such qualification is provided, "item" should be understood as encompassing any or all types of mail.

Operator – A person, organization or enterprise engaged in or offering to engage in an aircraft operation.

Pre-loading advance cargo information (PLACI) – The term used to describe a specific 7+1 data set, as defined in the WCO SAFE Framework of Standards (see Annex 1), that is drawn from consignment data and provided to regulators by freight forwarders, air carriers, postal operators, integrators, regulated agents or other entities as soon as possible prior to loading of cargo on an aircraft at the last point of departure.

Screening – The application of technical or other means which are intended to identify and/or detect weapons, explosives or dangerous devices, articles or substances which may be used to commit an act of unlawful interference.

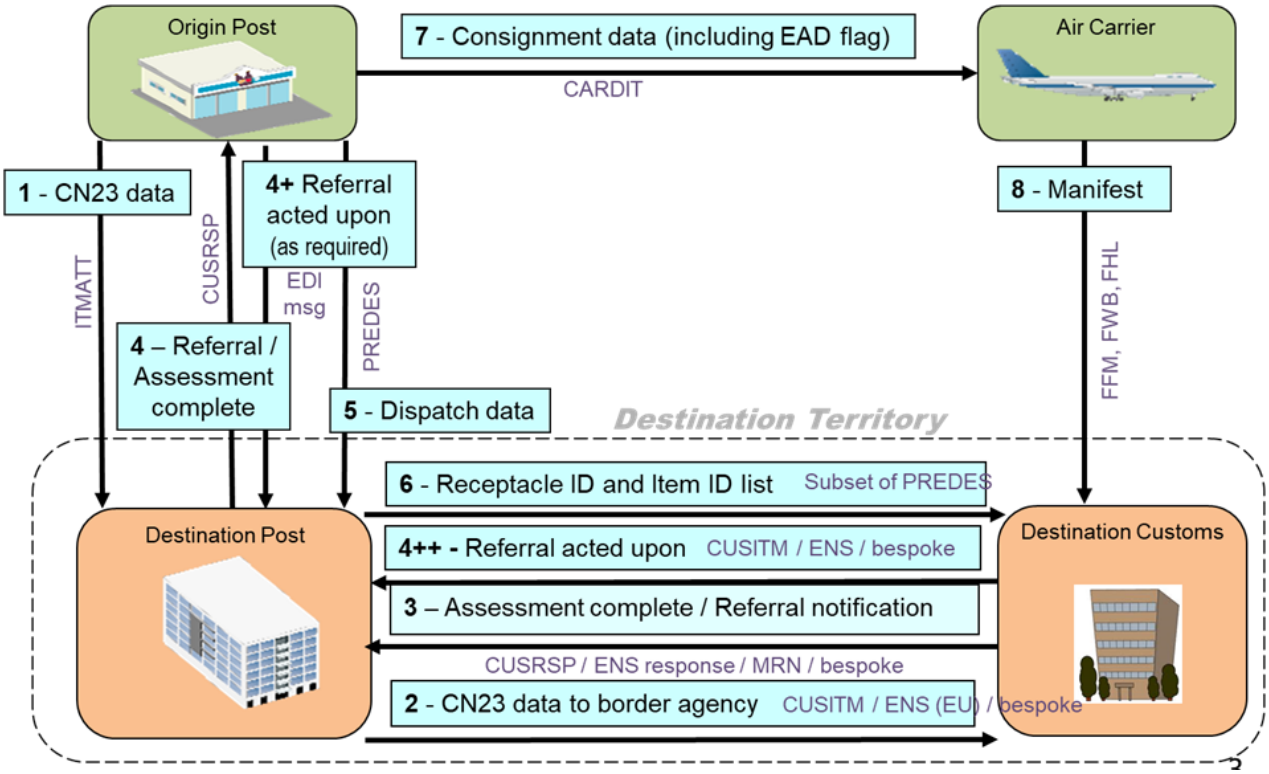
3 Background

PLACI is intended solely for the detection of IEDs/IIDs in air cargo. It is expected that the concept of PLACI will be implemented by some regulators and taken under consideration by others as an aviation security extension to the Advance Cargo Information (ACI) regime. ACI was designed to enable Customs to target and assess the risks of cargo shipments relative to a range of regulatory issues in advance of loading of cargo/mail on to an aircraft at the last point of departure. However, the development of PLACI was given an added impetus by a terrorist incident in October 2010, whereby IEDs were concealed in computer printer cartridges contained within cargo and placed on an aircraft. This incident led to the United States' Air Cargo Advance Screening (ACAS) pilot being established, followed by the European Union's PRE-loading Consignment Information for Secure Entry (PRECISE) and Canada's Pre-load Air Cargo Targeting (PACT) pilot.

These pilot projects have tested the use of PLACI to assess whether a cargo shipment is being used to conceal an IED or IID (i.e. a "bomb in a box") and methods to mitigate that risk. PLACI is an additional layer of security that may be used in addition to the current cargo security regimes; it may not, however, be used as a standalone security method.

4 Data communications

In response to emerging requirements for PLACI protocols in relation to shipments of international mail, the UPU developed the Global Postal Model (GPM) for electronic advance data (EAD) to incorporate the data flows between Posts, Customs and carriers, as well as the process protocols contained within the lifecycle of an item. The GPM is provided below for reference, and an explanation of each flow can be found in Annex 1.



Complete PLACI 7+1 electronic data submissions, i.e. ITMATT (Item Attribute) messages, should be sent by the origin Post, as indicated in the above diagram as Flow 1, as soon as the information becomes available and no later than two hours prior to loading the cargo on to the aircraft at the last point of departure.

Data submissions should be assessed by the appropriate authorities within the PLACI regime in a timely manner in accordance with risk rules and indicators, which should be developed and automated to the furthest extent possible according to available information on intelligence, threats and risks.

In an effort to ensure open lines of communication between DOs and air operators operating within a PLACI regime, the IATA–UPU Contact Committee has endorsed the provision of the risk assessment status through an AR flag code within the GPM flow 7 CARDIT message on the aggregate level, with a recommendation to enforce mandatory submission of the AR flag code as of 2023. The AR flag code within the CARDIT message will serve as confirmation from the origin Post that all required EAD has been submitted and that there is no known outstanding referral (i.e. RFI, RFS, DNL) at the time of transmission of the CARDIT message and handover to the operator.

5 Proposed PLACI risk response process

The PLACI document defines four distinct outcomes of the pre-loading risk analysis process, as follows: Assessment complete, Request for information (RFI), Request for screening (RFS), and Do not load (DNL). It is important to note that, as the document clearly states, packages will continue to move through the supply chain during the PLACI process unless a DNL assessment has been issued. If concerns are raised regarding cargo already in transit by air, these issues should be resolved at the earliest available opportunity through the air operators' existing protocols.

In order to ensure expediency, the transmission of the ITMATT message will be triggered as soon as the item enters the postal network, either physically or via electronic means. An appropriate amount of time should elapse between the ITMATT transmission and dispatch of the mail item. The suggested time period is 120 minutes.

RFI, RFS and DNL events will result in items within the postal supply chain being removed from the ordinary process. It is important to reiterate that RFI and RFS assessments should be issued in order to determine whether the suspect item poses a danger to aviation. A DNL must be issued only in the event of a credible threat/knowledge of an IED/IID.

The PLACI response outcomes are described in detail below.

Assessment complete

In the case where no air cargo security related risk is identified, or where a perceived risk has been successfully resolved, a regulator may decide to programme IT platforms to deliver a message to the 7+1 data submitter indicating that the risk assessment is complete. 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.[1].

The assessment complete may be explicit or implicit.

Request for information

An RFI referral should be sent for shipments when it is not possible to fully assess the risk to aviation security with the information contained in the initial filing. Such requests should be communicated as soon as possible.

The operator (or DO) should respond with the information requested as soon as possible, to enable the authorities to perform the risk assessment. Some operators (or DOs) may provide access to internal systems to reduce the need for RFI referrals.

Authorities may also suggest the optional inclusion of additional security information or confirmation if any screening (including what kind of screening) has taken place on the shipment in question (in the form of an electronic Consignment Security Declaration (eCSD)). This information may also be requested in an RFS, as described below. Provision of this additional information could avoid the necessity of applying additional security measures.[2]

An RFI should be issued only in the event that elements of the 7+1 data set are missing, incomplete or deemed incorrect (i.e. no such destination address), and these missing elements prevent the evaluating authority from completing its risk assessment process.

Request for screening

When additional evidence is required to determine if a risk to aviation security exists, or it is not possible to determine risk with the information available (including additional information from a RFI), a request for screening, screening using a secondary appropriate method (high-risk cargo and mail screening), or confirmation of screening can be sent by appropriate authorities. The consignment should not be loaded onto an aircraft until the screening has been conducted, unless the appropriate authorities and the operator (and/or DO) have agreed that the shipment must be moved to a location where the appropriate screening equipment is available.

Upon receipt of the RFS, the operator (and/or DO) should confirm what screening has already taken place and/or carry out the requested screening, where necessary as per ICAO Annex 17 regulations and/or the Member's applicable national cargo security programme measures. Results of any screening should be confirmed with the authorities. Providing the reason for the referral to the operator (or DO) may in some circumstances help them to determine which screening method is the most appropriate to address the potential risk, though it may not always be possible to provide these details if the nature of the information is confidential (e.g. proprietary information, classified intelligence).[3]

[1] Joint WCO–ICAO Guiding Principles for Pre-Loading Advance Cargo Information (PLACI).
[2] Joint WCO–-ICAO Guiding Principles for Pre-Loading Advance Cargo Information (PLACI).
[3] Joint WCO–ICAO Guiding Principles for Pre-Loading Advance Cargo Information (PLACI).

An RFS response should result in only two possible outcomes. Either the item should be deemed “safe to fly” or, if the item cannot be cleared through the additional screening processes, the export should be cancelled and the DO or screening designee should follow the notification procedures set out in S59 or their established local processes.

Do not load

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”), appropriate authorities[4] will issue a Do Not Load[5] order. A DNL order may also be issued if a threat item is identified in the cargo while in the process of resolving an RFS. In accordance with ICAO requirements, Members must have existing protocols in place, to address instances of imminent threat to aircraft presented by an air cargo shipment. These protocols can be leveraged by authorities in the context of PLACI.[6]

A DNL should be issued only by appropriate authorities that have access to specific intelligence or threat scenarios related to an imminent threat to aviation security. A DNL order should be issued by means of a mutually agreed person-to-person contact protocol which should be defined and agreed by all parties involved in the PLACI regime.

[4] Appropriate authorities may include any number of national authorities, including police, law enforcement and bomb squads, depending on the member country.
[5] It should be noted that the PLACI regime will normally be implemented by the destination country authorities. Therefore, the protocol for the communication of DNL messages will be established by the said destination country.
[6] Joint WCO–ICAO Guiding Principles for Pre-Loading Advance Cargo Information (PLACI).

Annex 1

Flow Initiation = CN 23 data captured electronically in transmittable format.

Flow 1 = ITMATT M33 V1 (Item Attribute 7+1 data) provided via CN 23 data from Origin Post to Destination Post.

Flow 2 = CUSITM V2 (CN 23 data transmitted by Destination Post to associated customs partner for security evaluation?).

Flow 3 = CUSRSP (Assessment results transmitted by associated customs partner to Destination Post. Associated code lists: 213 – Item Assessment; 214 – Request for Information; 215 – Request for Screening; 217 – RFRSP; 218 – Data Elements; European Commission (EC) code list 724 – HRCM; 735 – Referral Request; 752 – Additional information requested).

Flow 4 = ITMREF V1 – M53 (Destination Post provides customs assessment result to Origin Post).

Flow 4+ = REFRSP V1 – M54 (Origin Post provides information regarding any actions taken to Destination Post).

Flow 4++ = Destination Post provides received information on origin actions to customs partner.

Flow 5 = PREDES – Preadvice Dispatch (generated by the postal operator preparing the dispatch, and sent to the operator receiving the dispatch at the destination location, initially designed for planning and tracking purposes).

A dispatch can be represented as a structure with three levels:

1 The dispatch, having an identifier conforming to UPU standard S8.

2 The receptacles in the dispatch, having an identifier conforming to UPU standard S9.

3 The mail items in each receptacle; identified mail items have an identifier conforming to UPU standard S10.

Flow 6 = Destination Post provides receptacle ID and item ID list to customs partner.

Flow 7 = CARDIT – Carrier Documents International Transport (M48 – Origin Post provides consignment data (CN 38/CN 41/CN 47) including EAD flag to transport partner).

Flow 7+ = RESDIT – Response Documents International Transport (M49) – A response/confirmation EDI message, sent by the transport provider to the designated operator of origin, to provide status on various transportation events. As each of these transportation events are completed, individual RESDIT messages are to be sent.

Flow 8 = Air carrier provides manifest data to destination Customs.

Annex 2[7]

Pre-loading Air Cargo Security Data

1 Consignor, name: Name (and address) of the party who makes – or on whose behalf – the export declaration – is made – and who is the owner of the goods or has similar right of disposal over them at the time when the declaration is accepted.

2 Consignor, address: Name (and address) of the party who makes – or on whose behalf – the export declaration – is made – and who is the owner of the goods or who has similar right of disposal over them at the time when the declaration is accepted.

3 Consignee, name: Name (and address) of the party to which goods are consigned.

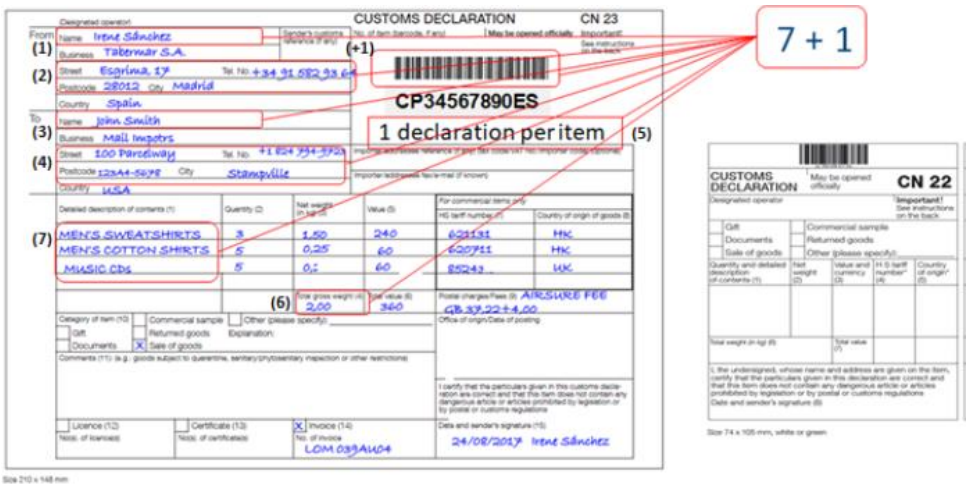
4 Consignee, address: Name (and address) of the party to which goods are consigned.

5 Number of packages: Number of individual items packaged in such a way that they cannot be divided without first undoing the packing.

6 Total gross weight (incl. measure unit qualifier): Weight (mass) of goods including packaging but excluding the carrier's equipment for a declaration.

7 Brief cargo description: Plain language description of the cargo of a means of transport, in general terms only.

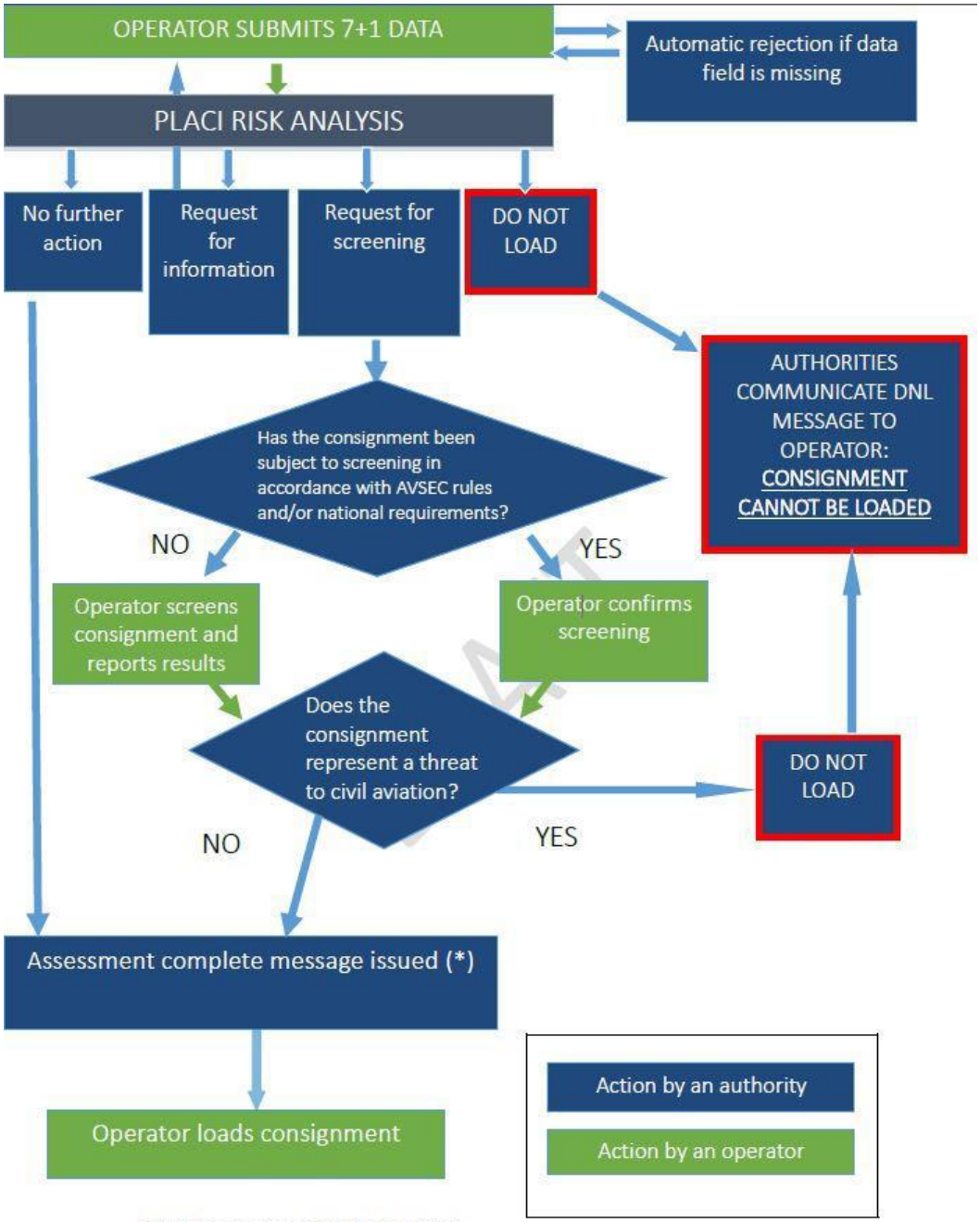
(+1) Identifier.



[7] Annex III of the WCO SAFE Framework of Standards.

Annex 3

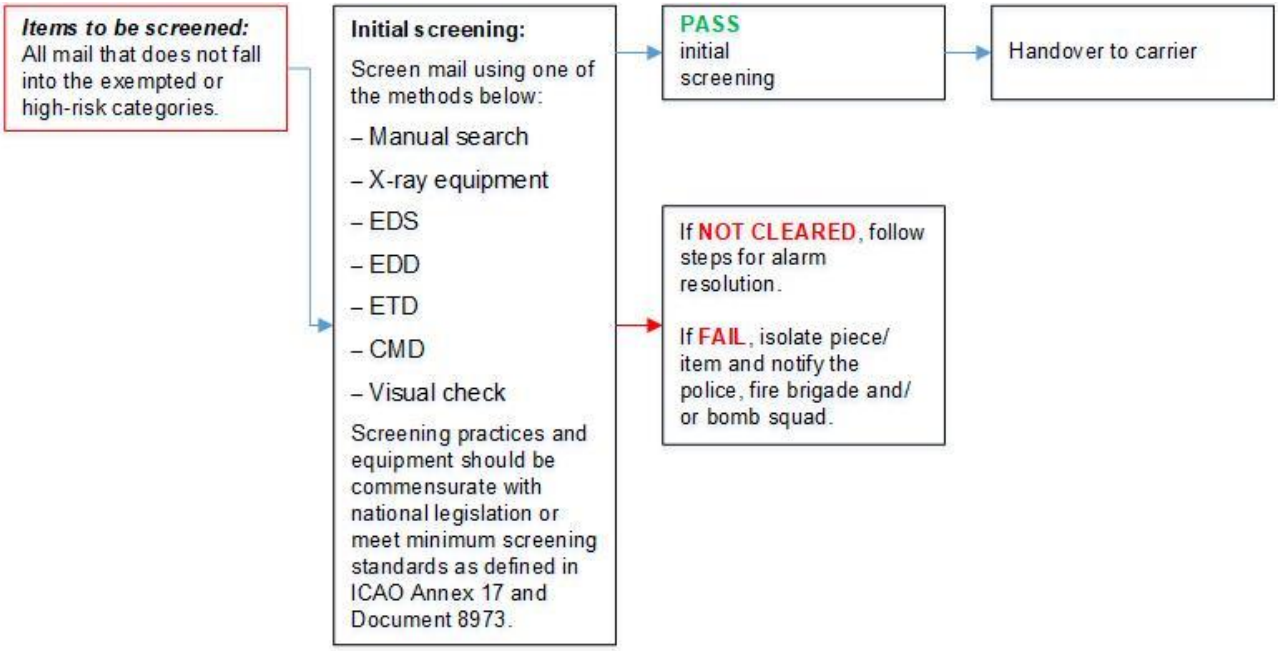
Joint WCO–ICAO PLACI process[8]



[8] Joint WCO–ICAO Guiding Principles for Pre-Loading Advance Cargo Information (PLACI).

Annex 4

Screening for international outbound mail intended for air conveyance



Legend

EDS: explosive detection systems

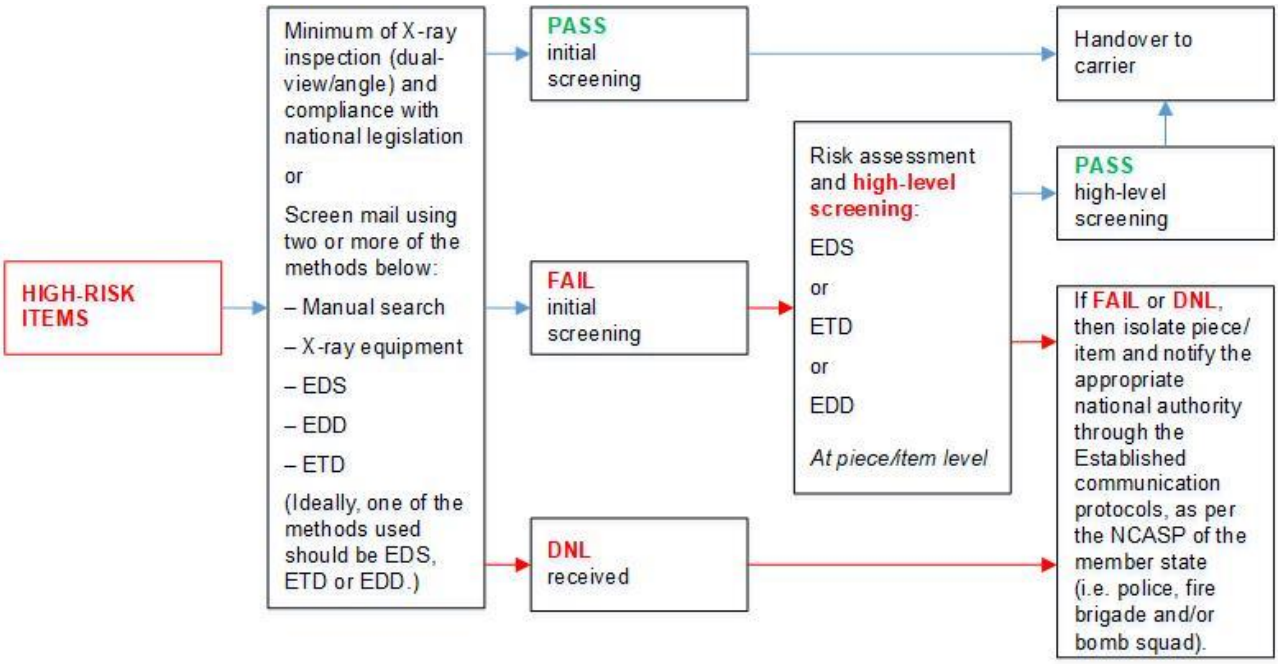
EDD: explosive detection dogs

ETD: explosive trace detectors

CMD: cargo metal detection

Annex 5

Screening for high-risk international outbound mail intended for air conveyance



Legend

EDS: explosive detection systems

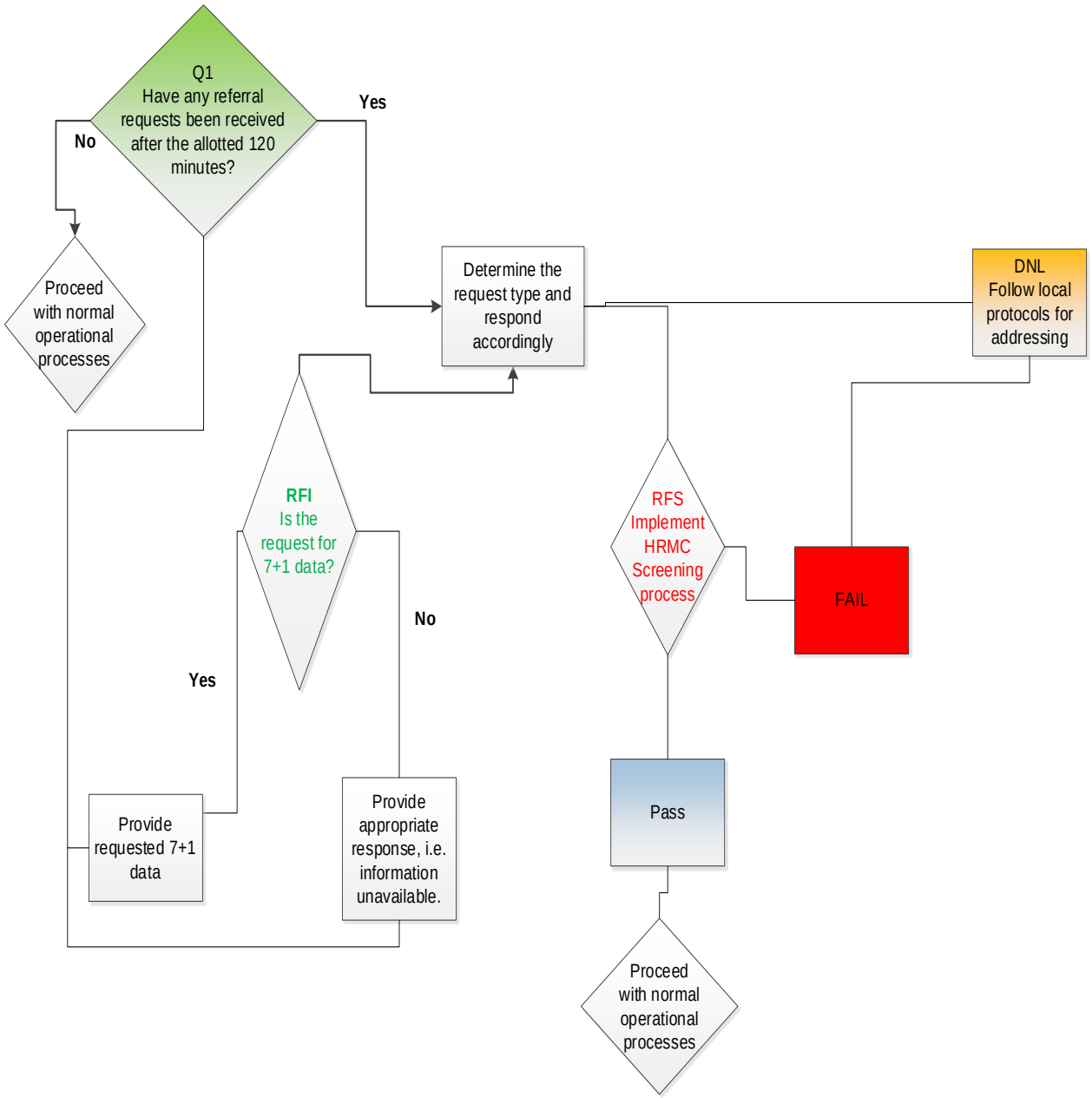
ETD: explosive trace detectors

EDD: explosive detection dogs

NCASP: national civil aviation security programme

Annex 6

Referral response process flow



References

The following reference documents are indispensable for the application of this document. In the case of dated references or references with a version number, only the edition cited applies. For undated references and where there is no reference to a version number, the latest edition of the referenced document (including any amendments) applies.

UPU Standard S58, Postal security – General security measures.

UPU Standard S59, Postal security – Office of exchange and international airmail security.

International Civil Aviation Organization, Annex 17 to the Convention on International Civil Aviation: Security – Safeguarding International Civil Aviation against Acts of Unlawful Interference.

Note 1. – Annexes 1 to 18 to the Convention on International Civil Aviation are available at store.icao.int.

International Civil Aviation Organization, Aviation Security Manual (Doc. 8973 – Restricted).

Note 2. – Requests for copies of Doc. 8973 should be submitted directly to the ICAO Document Sales Unit (sales@icao.int). Distribution of Doc. 8973 is restricted to authorized entities and individuals.

Joint WCO–ICAO Guiding Principles for Pre-Loading Advance Cargo Information (PLACI).