



Preloading Advance Cargo Information For compliance

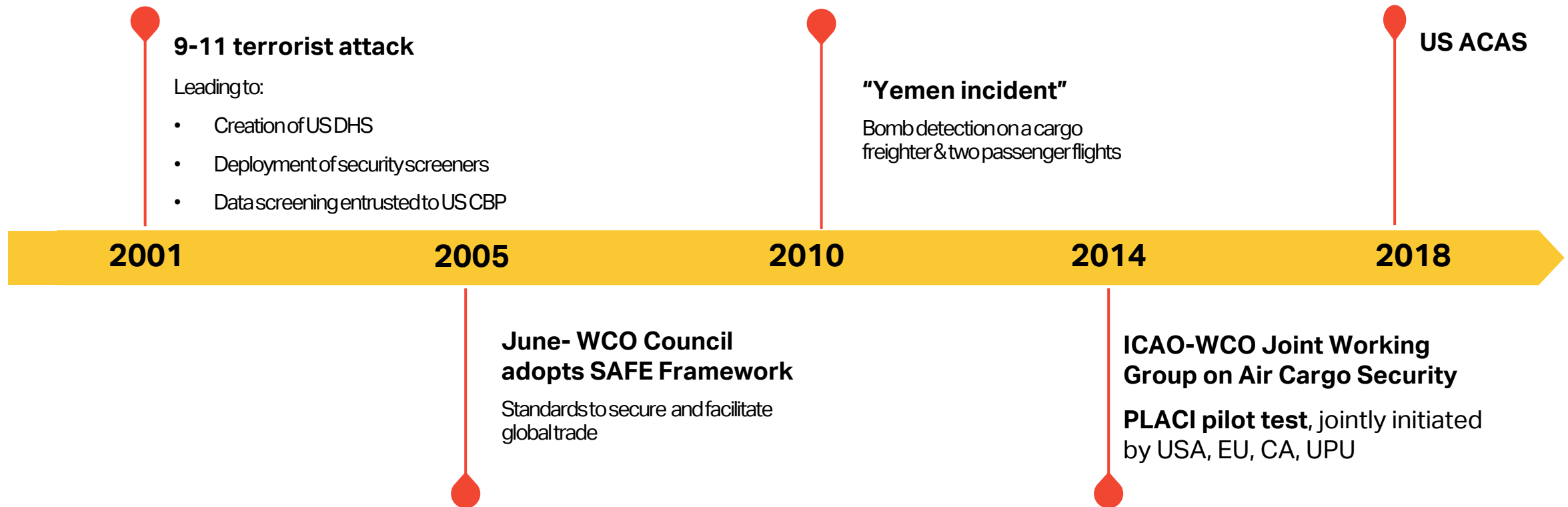
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Regional Cargo Manager
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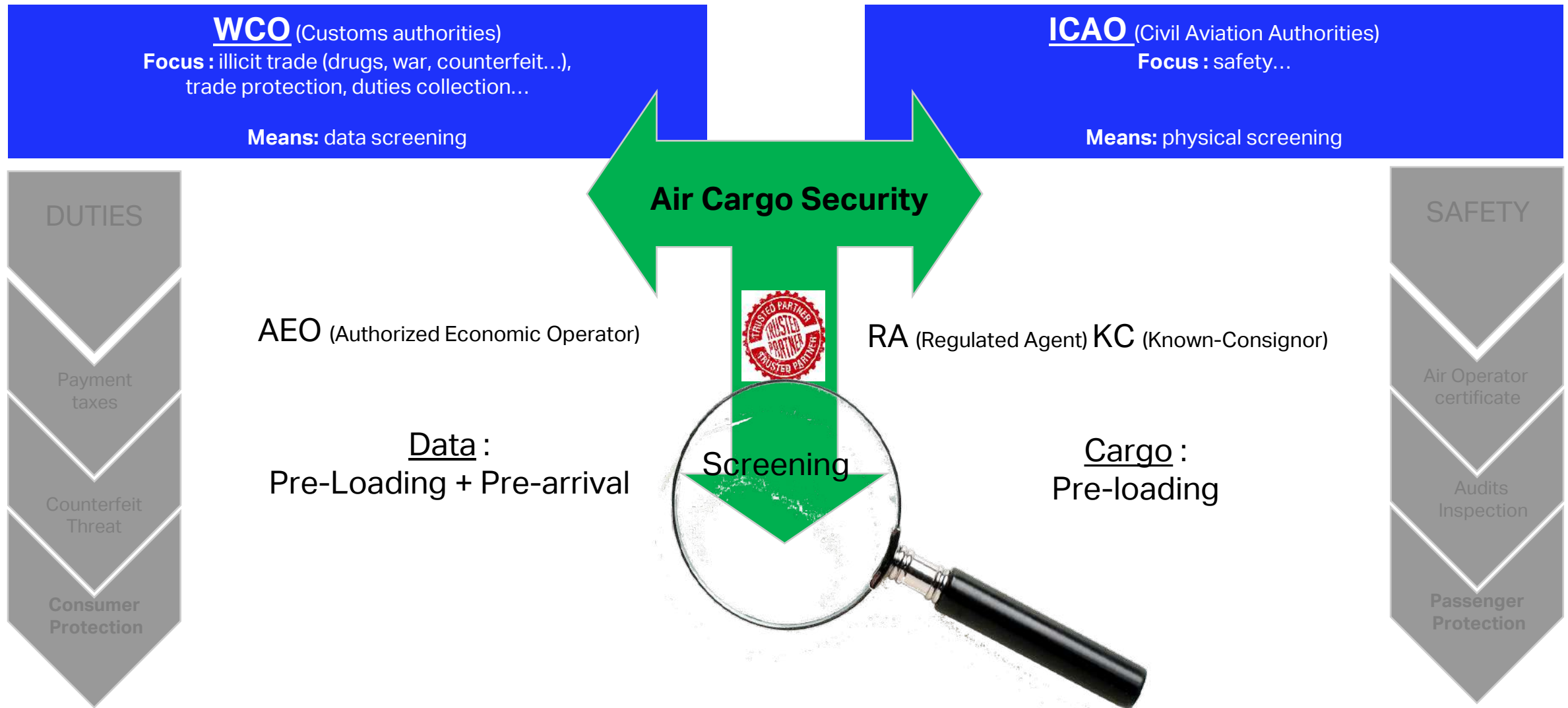
What are the international tools regulating air cargo border management?



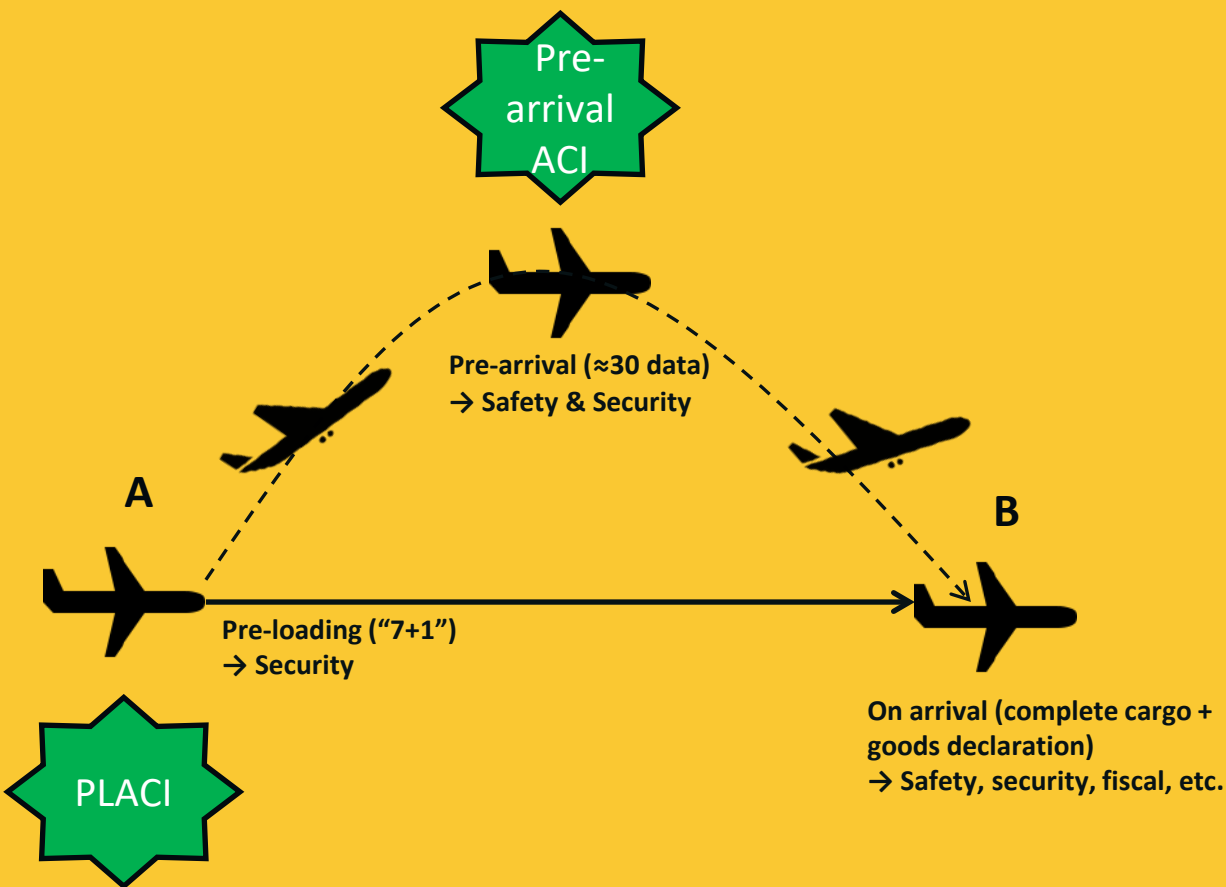
From 9/11 to PLACI



Air Cargo Security environment



New Security Regime & Air Cargo Security Risk

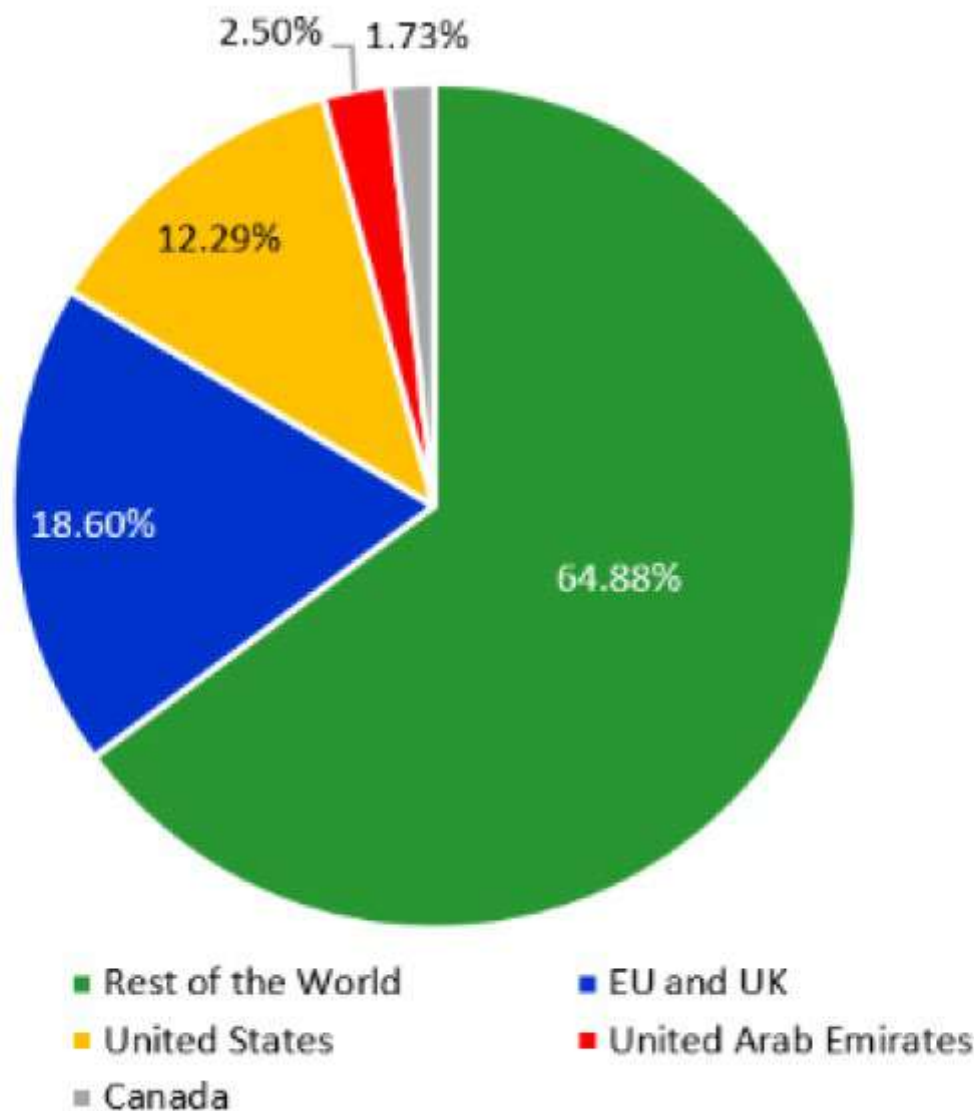


- Reacting to security threats and incidents, WCO and ICAO have jointly introduced an additional layer in the management of air cargo **security risk**.
- Customs and aviation authorities are increasingly enforcing new **security protocols** to identify and mitigate 'bomb in the box' from being loaded onto aircrafts.
- Airlines and freight forwarders must ensure **compliance** with these new security directives otherwise face **consequences**.

Pre-Arrival vs. Pre-Loading ACI

	Pre-arrival ACI	PLACI
Data	Complete set of shipment Data (30-70 data elements).	Limited set of advance data ("7+1" data elements). However, some PLACI programs (e.g. EU ICS2) are requesting specific, additional data elements , for example: ▪ Trader identification number for carrier, declarant, representative, supplementary declarant, consignee in EU – mandatory ▪ Type of person: For consignor, consignee, notify party – natural, legal person, group of people. ▪ Commodity code (HS6) etc.
Submission Checkpoint	Port of last entry into the country	Port of last entry into the country
Filing Timeline	• Prior Arrival for 4-hour long-haul flights • Immediately on departure for short haul flights	As early as possible prior Shipment Loading
Shipment Control	Destination ▪ On Arrival ▪ Customs office of first entry ▪ Customs office of unloading ▪ Customs office of destination ▪ Customs office of clearance	Origin Pre-loading ▪ Before loading of goods in 3rd country
Responsible Parties	Carrier Optional, depending on the applicable regime: Freight Forwarders	Carrier Optional, depending on the applicable regime: Freight Forwarders
Operational Processes & Referrals	None	Request for Information (RFI) Request for Screening (RFS) Hold (Do Not Load, DNL) Do Not Hold/ OK to go

35% of world annual cargo shipments are impacted by PLACI



4 PLACI Regimes are live



A blue circle containing the text 'US-ACAS'. A vertical line extends from the bottom of the circle to a horizontal line, which then branches into two bullet points.

US-ACAS

- June 2018: Live
- June 2019: Enforcement



A yellow circle containing the text 'EU-ICS2'. A vertical line extends from the bottom of the circle to a horizontal line, which then branches into two bullet points.

EU-ICS2

- Mar-Oct 2023: Live
- All Air Cargo + Mail



A red circle containing the text 'CA-PACT'. A vertical line extends from the bottom of the circle to a horizontal line, which then branches into two bullet points.

CA-PACT

- Jan 2024: Live
- April 2025: Enforcement



A purple circle containing the text 'UAE-NAIC'. A vertical line extends from the bottom of the circle to a horizontal line, which then branches into two bullet points.

UAE-NAIC

- 2018-2019: Legislation
- June 2025: Enforcement

- UK PLACI implementation is in progress as well
- Other authorities HK, India, Japan, Mauritius, Madagascar, Saudi Arabia

Enhanced Air Cargo Advance Screening Security Filing V2.0



New Guidance document

- Air Cargo Advance Screening (ACAS) Implementation guide v2.3.4 released in July 2025.

What is an Enhanced ACAS Security Filing?

- An Enhanced ACAS Security Filing provides additional data that better identifies the parties involved in the air cargo supply chain prior to cargo being loaded on board a U.S. bound aircraft.

Enhanced Air Cargo Advance Screening Security Filing V2.0 (Con't)



Key Changes

- CBP wants more information for the relationship that exists between the shipping customer and the air waybill issuer.

Enhanced Air Cargo Advance Screening Security Filing V2.0 (Con't)



Who is responsible to file an Enhanced ACAS Security Filing?

- The same entity who is currently responsible for filing the standard ACAS SF.

Is filing of HTS-6 in addition to the description found on the commercial invoice required?

- While this is not required under the current ACAS regulations, it is an industry best practice to provide both the HTS-6 as well as the merchandise description found on the commercial invoice.



Enhanced Air Cargo Advance Screening Security Filing V2.0 (Con't)



List of unacceptable goods descriptions

- A (unexhaustive) list of unacceptable goods descriptions was published¹ in Q4 2024 and leads to message rejections when the commodity description is deemed unacceptable by US CBP.

Note:

1. <https://www.cbp.gov/trade/basic-import-export/e-commerce/examples-unacceptable-vs-acceptable-cargo-descriptions>

Enhanced Air Cargo Advance Screening Security Filing V2.0 (Con't)



IATA published guidelines to provide for ACAS additional data requirements

- IATA enhanced the "Other Customs, Security and Regulatory Control Information (OCI) Composition Rule Table¹ to accommodate new ACAS data elements provide additional details that are not already captured in existing data fields for both C-IMP and C-XML messages
- IATA published the guidelines on how to provide US ACAS additional data requirements with messaging standards and this was also communicated to U.S. CBP
- Airlines and their supply chain partners are strongly encouraged to comply with the published guidelines to ensure uniformity and consistency in their efforts to comply with ACAS filing requirements.

Note:

- 14 1. <https://www.iata.org/contentassets/4bb3450ef9a2447493a132b38fac1d26/oci-composition-rule-table.pdf>



EU ICS2 Status and Progress



ICS2 Release 2 Readiness

- 2 October 2023 –end of ICS2 R2 deployment window.
- April 2024 –phased in closing of the ENS filing gap (90%).
- In full compliance now for cargo, mail destined to EU. Transit and transshipment mail through EU expected to comply from Jan 2025.

Impact of EU-ICS2 Release 2

Must provide additional data for cargo shipments & advance data for Mail consignments therefore Cargo-XML standards are mandatory

C-IMP doesn't support EU-ICS2 data requirements

Mail Consignments are subject to pre-arrival filing requirements

HS Code mandatory
(minimum 6 digit)

Cargo-XML standard is mandatory

Postal Air Waybill# use is mandatory

Conversion Solution UPU to IATA Cargo-XML Messaging

FF can file house data, but Carrier is responsible
Carrier need to further cascade customs referral

FF House Waybill filing with or without Master Air Waybill#

Self filing FF must provide data & Customs response to Airline

Carrier may refile the already filed House Waybills by FF

Discrepancy between FF and Airline is going to be monitored

Co-Loaders must provide share House Waybills to airlines

Must get Member State OK prior acceptance/loading
Referral must be resolved prior loading

Shipment Risk Assessment status can change

Immediate Action Do Not Load

Visibility on latest risk outcome (entire network)

Interline partner must provide Customs OK

Must get Member State OK prior loading

New SOPs to resolve referrals

Components of EU-ICS2 Compliance

Cargo Operation SOPs (Hub & Outstations)

- Upgrade Warehouse acceptance, Manifestation & Loading SOPs based on risk assessment response from PLACI destination.

Business Processes

- Implement new business processes with freight forwarders, interline partners & ground handlers.

Cargo & Mail IT Systems

- Enhance Cargo Management/Transport Logistics System to support additional data & processes. Integrate Mail Systems.

Cargo Messaging Standards

- Upgrade Cargo Messaging Standards to transmit the required data elements.

EU-ICS2 Filing Solution

- Implement EU-ICS2 filing solution in place i.e. transmit data, receive risk assessment responses, referrals etc.

Pre-load Air Cargo Targeting (PACT)



What is PACT?

- Aims to identify and apply mitigation measures to high risk air cargo shipments before they are transported to Canada
- Risk assessment of preloading advance cargo information (PLACI) with the assistance of advanced analytics.

Responsible Party, Other participants & exemptions

- Transporting Air Carrier (including courier and express) bringing cargo from outside Canada to any aerodrome inside Canada including transit, transfer and FROB.
- IT Service Providers may send/receive data on carrier behalf including 3rd parties like GSAs/GHAs.
- Self filing freight forwarders are allowed but required carrier consent/agreement.
- Exemptions: Mail, Dip Mail, baggage (checked in and carry on), export cargo, domestic cargo, non air import including Trucks.

Pre-load Air Cargo Targeting (Con't)



Data Elements & Supported Messaging standards

- PreLoad: 7+1 including origin shipper and final consignee, HS Code not mandatory
- Post Departure: Flight number, date, time, destination and list of manifested air waybills
- Messaging standards: Cargo XML (XFWB, XFZB, XFFM, XFNM, XCSN), C IMP (FWB, FHL, FFM), CAMIR (PER error, PSN ack, PSN)

Process Flows

- Acknowledge, Error and Assessment Complete Message
- PACT's Targeting Process Flow: Mitigation Level 1 RFI, Mitigation Level 2 RFS, Mitigation Level 3 DNL
- Messaging standards: Cargo XML (XFWB, XFZB, XFFM, XFNM, XCSN), C IMP (FWB, FHL, FFM), CAMIR (PER error, PSN ack, PSN)

Pre-load Air Cargo Targeting (Con't)



House level and Multiple Submissions

- House Level data required when it is consolidation
- Self filing FF can file house air waybill without Master. Carrier can file the Master Air Waybill later on.

Timeline:

- Live since November 2024
- Enforcement since 1 April 2025

UAE PLACI Program Status



Program Overview

- enforceable since 1 July 2025:
 - Messages: FWB, FHL, FFM, CSN (AC, RFI, RFS, DNL)
- HS codes are mandatory as of 29 Feb 2024.
- Postal shipments are currently exempted from PLACI filing.

UK Home office (PreDICT)



PreDICT Status

- Finalizing 2 way message.
- No timelines for airlines at the moment.
- UK implementation to be more aligned with EU ICS2.

Overall PLACI issue: multiple filing abuses

- Too many freight forwarders:
 - do not inform air carriers that they are filing separately the house data
 - file different data: house data filed by the freight forwarder do not match house and/or master data filed by the air carrier (although the air carrier's filing is based on the information provided by the freight forwarder)
- As a result, air carriers receive penalties for misdeclarations, as they are considered as the liable party for PLACI filing.

Real example

1. Shipment declared at origin as a direct Master with no houses.
2. The shipment arrived at its destination and consignee filed for house airwaybill data.
3. Customs crossed checked the data filed at the origin during PLACI submission versus the data filed by the clearance agent at the destination and noted a discrepancy.

Outcome:

A letter of non-compliance is issued by PLACI enforcing authorities for a shipment uplifted from origin with only 1 House air waybill filed, whereby multiple Houses cleared at the destination.

FWB/16
 1769 [REDACTED] CANMAD/T89K1809MC9.961
 FLT/EK9849/15/EK4026V/15
 RTG/DWCEK/DXBK/MADEK
 SHP
 [REDACTED]
 [REDACTED] NINGXI STREET
 /CAN
 /CN
 CNE
 [REDACTED]
 /AVENIDA CENTRAL 13 28042 MADRID
 /MAD
 /ES
 AGT//0833920/0203
 [REDACTED]
 /GUANGZHOU
 CVD/CNY/PP/PP/NVD/NCV/XXX
 RTD/1/P89/K1809/CQ/W1809/R49.65/T89816.85
 /NG WOMEN S CLOTHES/ ← NG identifier (stands for Direct AWB)

Emirates Airlines
 PO Box 686
 Dubai, United Arab Emirates

Letter of Non-Compliance
 Ref. Case No: 2023EUA049046

Dear Sir/Madam,

The U.S. Customs and Border Protection Air Cargo Advance Screening (ACAS) Compliance team conducted a compliance review of Emirates Airlines, and it was found to not be in full compliance with ACAS requirements under 19 C.F.R. §§ 122.48a, 122.48b, for loading and/or transmitting cargo for which no Air Cargo Advance Screening (ACAS) information was properly transmitted.

Specifically, on 08/24/2023, a compliance review of the data submitted by Emirates Airlines to CBP indicated that on 08/12/2023, Emirates Airlines (UAE) flight 205 departed with 43 shipments on board listed under MAWB 176-33620443. At the time of departure, none of the required ACAS filings had been provided to CBP for these 43 parcels. As such, CBP was unable to accurately assess potential air security threats prior to departure.

This incident may have represented a failure on Emirates Airline's part to comply with the above-mentioned ACAS regulations, and it may result in extended manifest holds, increased physical examinations, an assessment of liquidated damages under 19 C.F.R. § 113.64(k)(1) of \$5,000 per violation (up to a maximum of \$500,000 per aircraft arrival), and/or other actions. For a CTPAT company that remains non-compliant, CBP will consider reducing, suspending, or even revoking the company's CTPAT status.

CBP is committed to working with all its partners in the trade community to ensure their success in complying with the new regulations. As part of the review into the circumstances of this alleged violation, we are providing this opportunity for Emirates Airlines to submit in writing any information regarding this matter. This information should be submitted within 20 calendar days.



Overall PLACI issue: multiple filing abuses

IATA guidance on multiple filing available in IATA PLACI Manual and upon request:



Advance Cargo Information Protocols for Self-Filing to Customs Authorities

Introduction

This document is a guidance paper to address processes and procedures related to multiple party filing (self-filing of third parties) under applicable pre-arrival and pre-loading Advance Cargo Information regimes.

The objective of this paper is to have a common understanding of harmonized rules for multiple party filing, taking into consideration the existing combination of filing options and handling of referrals, to add transparency to the customs self-filing process, enhance efficiency, and prevent any regulatory compliance issue.

Summary

Although the electronic filing of Master Air Waybill (MAWB) and House Air Waybill (HAWB) shipment data by the airline to customs is a straightforward requirement, the newly designed PLACI regimes increase the complexity and therefore require closer alignment and coordination between the filing parties involved to ensure efficient and smooth flow of the goods through the supply chain. The multiple-filing option is available to third parties (e.g. freight forwarders, other carriers, ground handlers) where customs regulations authorise the HAWB data to be filed to customs by or on behalf of the HAWB data owner, the third party, instead of such data being filed by the airline by default.

Unfortunately, these same regulations lack any third party obligation to communicate the intention to self-file to the airline, probably on the basis that such obligation falls under a Business-to-Business relationship. This situation has in fact led to opacity and confusion with several multiple-filed shipments going awry with customs, resulting in warnings being issued by customs to airlines due to duplicative, mismatching, or missing filings.

Multiple-filing is compounded by the growing demand for transporting MAWB shipments that comprise thousands of HAWBs each, where the HAWBs are being self-filed without the knowledge or prior agreement of the airline transporting the goods. These HAWBs are invariably Business-to-Customer type e-commerce orders that are purchased online and consolidated before transportation to their consumers.

Some applicable regulations (e.g. EU) hold the party filing corresponding HAWB or MAWB data liable for the accuracy of the content lodged and submission thereof within the defined timelines, while the airline, as the party bringing the goods onto their customs territory, remains responsible to ensure that a confirmation of completed risk assessment ("assessment complete" status) was obtained, by the party filing, prior to loading the goods on board the aircraft. Nevertheless, in practice airlines have also been considered (e.g. in the US) as the responsible party for the correct reporting of the shipment MAWB and HAWB data, even when shipments are self-filed. The fact that airlines have received warnings by customs due to duplicative, mismatching, or missing filings despite no fault of their own underlines the urgency in addressing this issue.

This paper provides some recommendations to address this matter, outlining which elements should be taken into consideration by airlines and their supply chain partners, to add visibility to the multiple-filing processes, enhance process and cost efficiency, and reduce the risk of infringement measures applied by competent customs authorities.



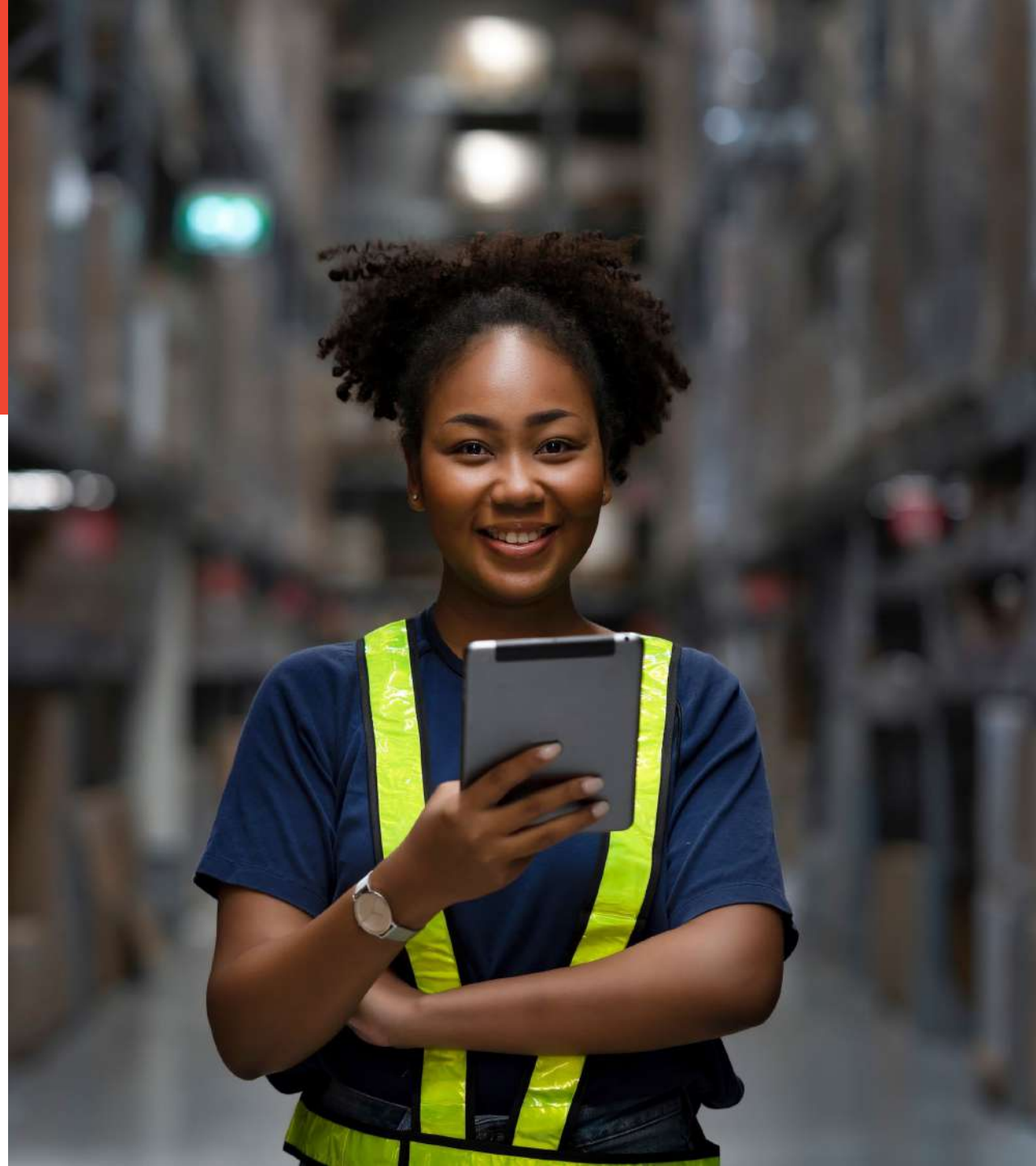
PLACI Manual 7th Edition

available soon

<https://www.iata.org/placi>

Release Notes for 7th edition:

- Business requirements from IATA Member airlines
 - Useful for airlines/ customers and partners
 - Airlines involved with interlining
- Latest updates on current PLACI programs, incl. with latest CA PACT and UAE PLACI implementation guides
- High-level comparison table between the existing PLACI programs



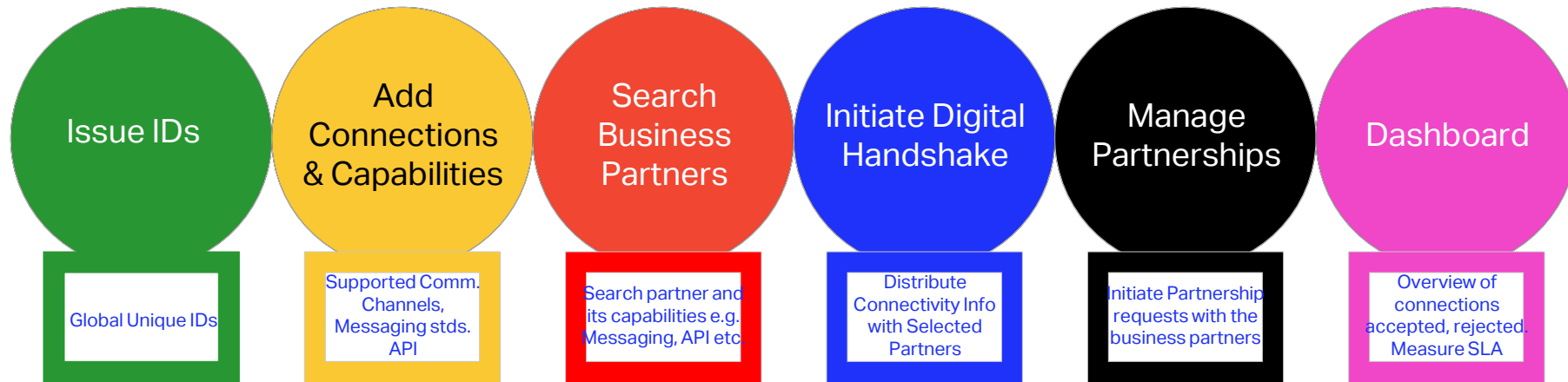


Enhanced Partner Identification & Connectivity

Web Portal & API <https://iata.org/epic>

" A Global repository where you can issue global IDs and engage your cargo partners for digital connectivity"

Features:

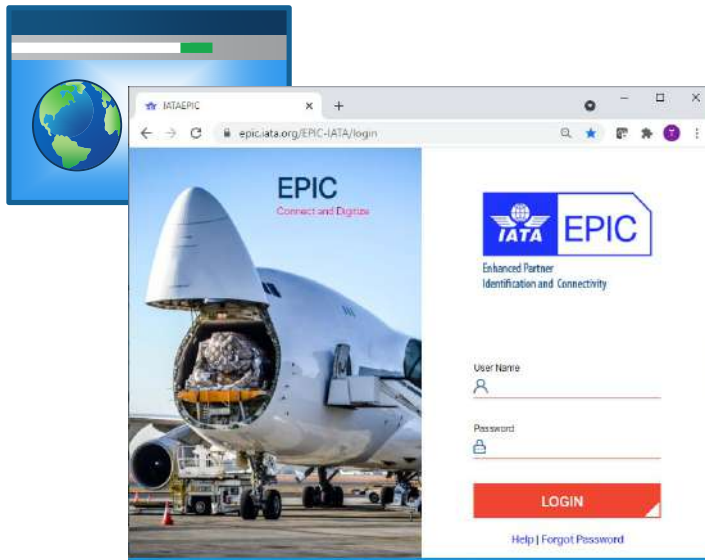


Benefits:

- **Cost Reduction:** Release 40% time of a dedicated resource.
- **Free up Resources:** Eliminate part time resources for backend work.
- **Time Gain:** reduce connection time from weeks to a few minutes.
- **Digital Cargo Acceleration:** Improved visibility & ease of connectivity contributes to digital cargo acceleration.
- **Data Quality Improvements:** Quality of data will be greatly increased as the current, fragmented infrastructure leads to numerous loss of data.

How It Works?

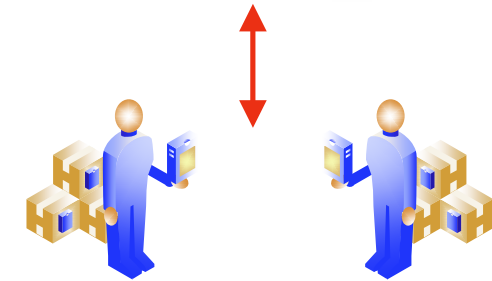
IATA EPIC Web Portal



Airlines, FFs, GHAs etc.

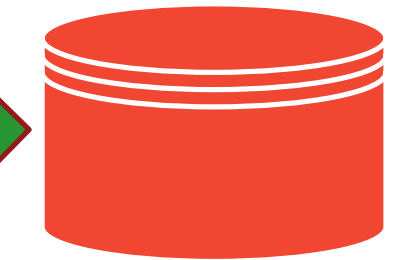
IATA EPIC Lookup Service

Web Service/API,
XML Registration for Cargo Partner (XRCP) Message
Email Alerts, Data Download etc.



Airlines IT Dept, FFs,
IT Companies etc.

CCS(s)



EPIC Centralized
Repository

EPIC Benefits

**Cost
Reduction**

**Time
Gain**

**Digital
Cargo
Acceleration**

**Improving
Efficiency in
the Movement
of Goods**

**Data Quality
Improvements**

**Advancing
Automation
Technology**

**Process
Optimization**



Search Customs & Governments



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Type

CUSTOM/AVSEC/GOVT ▾

Name

Country

--Select-- ▾

Search

[Advanced Search](#)

Total Records : 17 (CUSTOM/AVSEC/GOVTs : 17)

[XLS](#)

	Type	EPIC User	Name	Country	City	CASS Number	Capability	Connectivity
+		✓	Bangladesh National Board of Revenue (NBR)	BD	Dhaka		1	1
+		✓	Canada Border Services Agency	CA	Ottawa		0	0
+		✓	Estado Plurinacional de Bolivia	BO	Sucre		5	1
+		✓	Guichet Unique du Commerce Extérieur	CI	Abidjan		2	2
+		✓	Jamaica Customs Agency	JM	Kingston Tinson Airp		2	1
+		✓	Jordanian Customs	JO	Amman		0	0
+		✓	MEXICO Customs	MX	Ciudad de México		4	1
+		✓	Ministerio de Hacienda – SICEX Chile	CL	Santiago		2	1
+		✓	Pakistan Single Window Company	PK	Islamabad		0	0

Further drilldown in Customs Info.

Identifications and Connections

Capabilities

Office Details

Type	ID	Mode	Connection	Details	Attachment
Third Party Reference	Transport Canada Webservice	Air	SOAP Simple Object Access Protocol	https://tc.canada.ca/en/aviation/aviation-security/submit-air-shipment-details-destined-to-canada	

Identifications and Connections

Capabilities

Office Details

Standard	Name	Versions	Capability	Conversion	Business Rules/Info	Last Updated On
Cargo-IMP	FWB-Air Waybill Data	16,17	RECEIVE	No	consult team for rules	2020-08-20 ⌚ 05:37 PM
Cargo-XML	XFWB-Waybill	3.00	RECEIVE	No	consult team for rules	2020-09-08 ⌚ 02:07 PM
Cargo-XML	XFZB-House Waybill	3.00	RECEIVE	No	consult team for rules	2020-09-08 ⌚ 02:07 PM

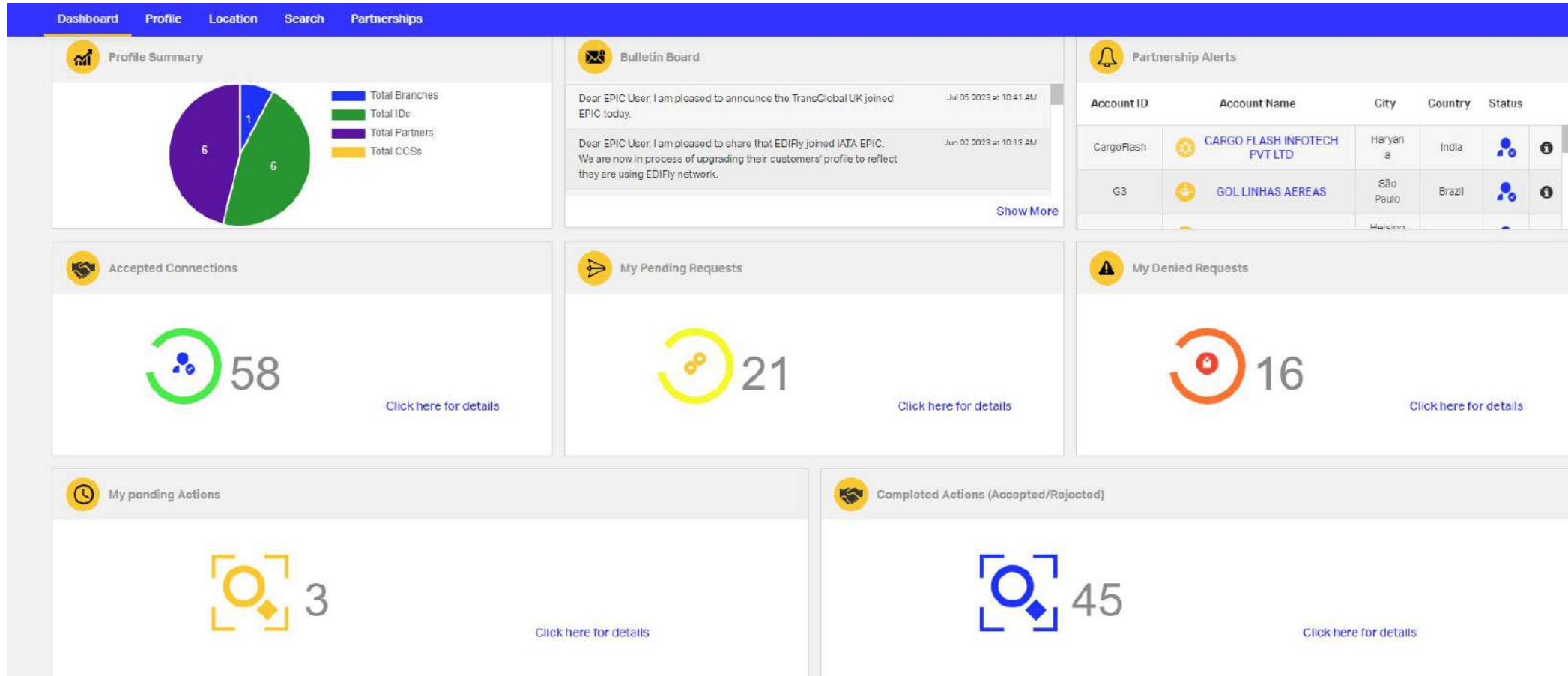
Identifications and Connections

Capabilities

Office Details

Account Type	HQ	Branch
CUSTOM/AVSEC/GOVT	Transport Canada - Government of Canada 330 Sparks Street Ottawa Canada	Transport Canada - Government of Canada OTT Canada
General Contact	Technical contact	Branch Contact
Brook Carrothers Manager-PACT Program Tel 13435533072 brook.carrothers@tc.gc.ca	Chesley Escott Program Officer Tel +16139905684 chesley.escott@tc.gc.ca	Stan Martens Tel +16139905684 Stan.martens@tc.gc.ca

Dashboard



4000+ Connection Setups in EPIC



102

Airlines



1284

Freight Forwarders



18

IT Companies/CCS



24

GSAs



17

Governments



6

Cargo Handlers

www.iata.org/epic

Thank you

Further questions:

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Asia-Pacific, IATA

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