



**WORKING PAPER**

**FACILITATION PANEL (FALP)**

**ELEVENTH MEETING**

**Montréal, 13-16 January 2020**

**Agenda Item 6: Other matters**

**CHALLENGES OF NON-ADHERENCE TO PASSENGER DATA STANDARDS**

(Presented by the Netherlands, the United Kingdom and the International Air Transport Association)

**SUMMARY**

This paper is intended to highlight the data quality and compliance challenges for aircraft operators when Contracting States deviate from passenger data standards and require non-standard elements to be included in operators' Advance Passenger Information and/or Passenger Name Record data. The information in this paper is the work of the International Air Transport Association Control Authorities Working Group (IATA CAWG), an expert forum of Airlines and Government officials who work collaboratively to recommend solutions and establish best practices for border management that contribute to the facilitation of legitimate passengers whilst ensuring secure borders and aviation.

**Action by the FAL Panel:**

The FAL Panel is invited to consider the proposals described in this paper and agree that Annex 9 be amended, as set out in Appendix 1.

**1. INTRODUCTION**

1.1 Aircraft operators provide Advance Passenger Information (API), interactive API (iAPI) and Passenger Name Record (PNR) data to governments in compliance with legislative and regulatory requirements of border security, law enforcement, immigration and/or customs agencies based on existing standards.

1.2 These global standards (PAXLST and PNRGOV) have been developed and agreed jointly by Contracting States and aircraft operators within the frameworks of the World Customs Organization (WCO), International Air Transport Association (IATA) and International Civil Aviation Organization (ICAO).

1.2.1 In regard to API, the ICAO Facilitation Guide, ICAO Annex 9, Chapter 9: Passenger Data Exchange, 9.8 states: "When specifying the identifying information on passengers to be transmitted,

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Contracting States shall require only data elements that are available in machine readable form in travel documents . . . All information required shall conform to specifications for UN/EDIFACT PAXLST messages found in the WCO/IATA/ICAO API Guidelines.”

1.2.2 In regard to PNR, ICAO Annex 9, Chapter 9: Passenger Data Exchange, 9.22.1 states: “Contracting States requiring the transfer of PNR data, shall adopt and implement the EDIFACT- based PNRGOV message as the primary method for airline-to-government PNR data transferal to ensure global interoperability.”

1.3 Aircraft operators’ systems have been developed to communicate and transfer API and PNR data to Contracting States in the PAXLST and PNRGOV formats, respectively, as per the standards.

1.4 Increasingly however, Contracting States are requiring aircraft operators to provide non-standard data (refer Appendix 2). The impact of additional non-standard data requirements on aircraft operators and, in turn, their technical suppliers and customers is often not understood by Contracting States.

1.5 Since the standards are part of the security audit, Contracting States are informed of the possible consequences of unintended non-compliance and thus with having a finding against the Contracting State in the ICAO security audit.

1.6 The purpose of this Working paper is:

1.6.1 To raise awareness, as many Contracting States that require aircraft operators to provide non-standard data are either unaware of the global standards or unfamiliar with how aircraft operators’ business processes and data systems work.

1.6.2 To increase adherence by Contracting States with inter-governmental standards and internationally agreed best practices for the collection, storage, formatting and transmission of API, iAPI and PNR data.

1.6.3 To raise awareness of the existing formal process for consideration of the addition of new data elements to existing standards before requiring such information from aircraft operators.

## 2. **DISCUSSION**

### 2.1 Types of Non-Standard Requirements

The aircraft operator members of the IATA CAWG provided information on non-standard data requirements made by Contracting States implementing and developing their API, iAPI and PNR systems. This information is provided as Appendix 1. The following types of non-standard requests were identified as most prevalent:

#### 2.1.1 Non-Standard Data Elements

The WCO/IATA/ICAO Guidelines on API state that aircraft operators’ systems are not geared to collect additional or ad hoc data that is not otherwise collected as part of the normal course of business. The same holds true for the PNR Guidelines (ICAO Doc 9944), which notes that Contracting States should not require or hold an aircraft operator responsible for submission of PNR data that is not already collected or held in an operator’s Reservation or Departure Control Systems.

Some Contracting States are requiring that non-standard data be included in aircraft operators' reservation systems, even though the same data may already be in scope of existing industry standard message structures (SSR and OSI) within the existing UN/EDIFACT PNRGOV message structure.

In other instances, Contracting States are requiring non-standard data that is not collected for operators' own business purposes as typical reservation entries and as a result, may not be accommodated in the PNRGOV message format.

Examples of non-standard requirements made by Contracting States include:

- Emergency contact information
- Next of kin information
- Health-related information
- Estimated departure and estimated arrival times

#### 2.1.2 Non-standard Format and Transmission

Contracting States should adhere to receiving data only in standard formats, UN/EDIFACT PAXLST for API and iAPI, and PADIS-based EDIFACT for PNRGOV, as well as the related transmission protocols.

There are Contracting States that have required transfer of API and PNR data by email, which is unmanageable and unpractical for several reasons, including data security and privacy.

There are also Contracting States that have placed requirements on operators to engage third-party service providers to reformat global-standard compliant data into proprietary government formats at the aircraft operators' expense.

#### 2.1.3 Non-standard Timing

Some Contracting States have adopted national legislation requiring aircraft operators to collect non-standard data when reservations are made. Often, aircraft operator tickets are sold internationally through agents, and therefore it is not possible to enforce data collection.

Furthermore, as flights open for reservation up to 331 days prior to departure, some information being required may simply not exist or be available at the time of booking or may change extensively in the period prior to departure.

Finally, Contracting States need to acknowledge that data provided by customers, or their agents, during the time of booking, is unverified and may be unreliable.

Requirements for non-standard or ad-hoc data often means that aircraft operators have to collect this information verbally at the airport which necessitates manual data input. This either results in two-step check-in processes, initially and partially remotely using self-service online tools and a second on arrival at the airport thereby negating the ability entirely to check-in remotely.

#### 2.1.4 Inefficient use of data / formats

Some Contracting States are requiring airlines to provide API, iAPI and/or PNR data, when the State does not review or use the data. This is especially evident where Contracting States have iAPI but provide a blanket positive boarding directive, interspersed with unsolicited no board messages, which means

aircraft operators are not relieved from manual eligibility checks and the expected benefits of implementing a costly interactive system.

Similarly, it has become apparent that most Contracting States requiring both API and PNR, or iAPI and PNR data do not review or use the two together. API/iAPI and PNR are often received by different agencies that may be restricted from sharing information with each other. As a result, aircraft operators are expected to review PNR data and identify potential 'issues' even when receiving an iAPI 'ok to board'. This creates a gap in border risk assessment as the information being provided by aircraft operators is not being used to its maximum opportunity, yet aircraft operators are held to high standards of data provision investment and compliance. This goes against the single window concept.

## 2.2 Challenges for Aircraft Operators to Manage Government's Non-Standard Requests

There are various challenges for operators associated with adapting to States' non-standard data requirements.

Aircraft operators' processes are moving away from airport-based face-to-face transactions with passengers. Similarly, to Contracting State-implemented automated border controls, aircraft operators are deploying self-service applications, including check-in via kiosks, online and mobile apps. Any direction by Contracting States to increase the extent and amount of passengers' personal data which must be collected by aircraft operators simply impedes that evolution in business practices being demanded by their customers.

In fact, this trend could cause a renewed focus on the manpower-intensive, far less efficient, individual manual check-in transactions of the last decade and century. Such requirements are not aligned with current design and planned capacity of new and modern airport terminals. In addition, they do not recognize the existence of 'front of house' security threats which target high-visibility locations with large crowds, like airport check-in halls.

## 3. RECOMMENDATIONS

3.1 The following recommendations to achieve adherence to standards and cease non-standard requests are based on two principles:

### 3.1.1 Raise awareness of current standards with Contracting States

- i. Security and Border Control Agencies of ICAO Contracting States need to be better informed of the existing standards and internationally agreed best practices that have been developed and approved relating to the collection, formatting and transmission of API, iAPI and PNR data.
- ii. WCO, ICAO and IATA have developed guidance documentation - Passenger Data Toolkit, which is accessible on the following website:  
<https://www.iata.org/publications/api-pnr-toolkit/Pages/index.aspx>

### 3.1.2 New data elements may only be requested after inclusion in a future amended ICAO/IATA/WCO standard through a formal approval process. In doing so:

- i. Contracting States need to demonstrate that any new data element being requested is necessary for border security or other critical border risk purposes.
- ii. Contracting States must follow the formal request and approval process to include any new data elements into the existing standards for API and PNR via the WCO/IATA/ICAO Contact Committee, before imposing the requirement on aircraft operators.

- iii. Contracting States to allow aircraft operators and their system providers sufficient time to implement changes based on new standards in order to minimize the impact on aircraft operator systems and customer facilitation and to increase compliance

#### 4. **CONCLUSION**

In conclusion the Panel is invited to discuss the following:

4.1 To call upon ICAO to amend the USAP Audit documentation to include iAPI and PNR standards in addition to the existing reference to API standards, specifically to evidence compliance with the WCO/ICAO/IATA Standards.

4.2 To call upon ICAO to take action when non-compliance is identified. Given the fact that audit outcomes of the USAP security audit are confidential, ICAO might consider proactively engaging with the Contracting States about this deviation to standards to assess, together with the State whether these non-standard elements should be added to the standards of WCO/ICAO/IATA.

4.3 ICAO to confirm that any new data elements for inclusion in API, iAPI and PNR should be implemented in conjunction with the Data Maintenance Request (DMR) process via a review and endorsement process by the WCO/ICAO/IATA Contact Committee, where one or more Contracting State(s) have demonstrated added value of inclusion of a new element; or potential devaluation of risk assessment without inclusion of new elements.

4.4 Accordingly, the Panel is invited to amend Annex 9 as set out in the Appendix 1.

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**APPENDIX 1**

*Amend* Annex 9 as follows:

**CHAPTER 9. PASSENGER DATA EXCHANGE SYSTEM****A. General**

9.XX Contracting States shall not require aircraft operators to provide non-standard data elements as part of API, iAPI and / or PNR provisions

9 XX Contracting States shall, when considering requiring elements that deviate from the standard, submit a request to the WCO/IATA/ICAO Contact Committee in conjunction with the WCO's Data Maintenance Request (DMR) process via a review and endorsement process for inclusion of the data element in the guidelines.

**B. Advance Passenger Information (API)**

~~9.10 When seeking to implement a national API programme, Contracting States that are unable to comply fully with the provisions contained in 9.8 with respect to data element requirements shall ensure that only those data elements that have been defined for incorporation into the UN/EDIFACT PAXLST message are included in the national programme's requirement or follow the WCO's Data Maintenance Request (DMR) process for any deviation from the standard.~~

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**APPENDIX 2**

**NON-STANDARD DATA REQUESTS (STATES NAMES REMOVED FOR CONFIDENTIALITY)**

STATE	STANDARD	VARIATION
1	iAPI/API	Unclear request, not sure if interactive or not, no clear specifications
2	iAPI	Document type code Q - traveller is exempt from prescribed IRPA document requirements
3	API	Eticket number requested as part of API
3	iAPI	Providing default 'ok to board'
3	API	Aircraft Tail number
3	API	Fake visa number is requested under TWOV condition
3	API	Secondary documents are mandatory
3	iAPI	Non standard document types
3	API	Channel processing information
3	API	Require fake e-ticket number if carrier does not generate one as part of business process from LCC
3	API	Secondary document to be reported as an "O"
3	PNR	Require fake e-ticket number if carrier does not generate one as part of business process from LCC
4	API	Enter API data manually to be uploaded to an in-house portal
5	iAPI	Proposing that airlines send Country of Arrival rather than Airport code.
6	API	Must send to two different addresses - no single window
7	API	Does not accept a UN/EDIFACT formatted message directly from carriers as it has its own proprietary format. Carriers must pay a third party to convert standard UN/EDIFACT formatted message into the government's proprietary format.
8	API	Not adhering to single window API needs to be sent to multiple sources
9	API	Request passenger manifest (API/PNR) via mail address - no more specification
10	API	Not adhering to single window API needs to be sent to multiple sources
11	API	Not adhering to single window API needs to be sent to multiple sources
12	iAPI	Providing default 'ok to board'
13	iAPI	6001 and 6002 error codes. 6001 states to not use invalid characters, yet 6002 states to use a "-" for pax with just a single name, so this is contradictory. FNU should be used.
14	API	Only the following primary travel documents are supported by this system: P, O, N and I. if a passenger is traveling with a military ID or a Refugee Document, as a primary travel document, Countries that use the APP system expect to receive code "O" and countries which use the official PAXLST format expect to receive "M" for the military ID or "T" for Refugee document.
15	API	Requesting bag tag numbers as part of API
16	API	Special passports has to be reported in the API message as: PD - Diplomatic PS - Special PM - Service / Mission passport To other countries it has to be reported as "P"
17	iAPI	Require ticketed bookings to contain a date of birth 72 hours before travel.
17	iAPI	Require emergency contact details
17	iAPI	Full address in the destination country
17	iAPI	Country of Residence
18	API	Requesting bag tag numbers as part of API