

Passenger Name Record (PNR) data



Why is everyone talking about Passenger Name Record (PNR) Data?



United Nations Security Council has passed several resolutions on PNR, namely 2395 (2017), 2396 (2017) and 2482 (2019).

The ICAO Facilitation Panel formed a PNR Task Force to align ICAO Annex 9 with UNSCR 2396 (2017), which “urges ICAO to work with its Member States to establish a standard for the collection, use, processing and protection of PNR data.”

What is PNR Data?

A PNR is airline reservation data recorded by reservation systems for each journey booked by or on behalf of any passenger. PNR data are used by airlines for their own commercial and operational purposes in providing air transportation services. This data can be sent to States to fulfil border and national security purposes.

PNR data content varies from airline to airline and even from passenger to passenger. PNR contains only as much as the airline or booking agency collects in the process of its travel bookings. At the same time, airline industry systems are programmed to transfer the entire contents of a PNR to States and do not want to filter out data which may want to be considered sensitive. Thus, States need to set up their own data filtering and protection systems to deal with sensitive data.

The airline industry cannot guarantee the accuracy of PNR data, as reservation data is filled with self-asserted and unverified data collected for commercial purposes during the time of booking. The names of passengers in a PNR may not match the name on the passport used for travel and even passport data in the PNR is subject to change, since a passenger may lose, renew or otherwise change his passport after a booking is made. Advance Passenger Information (API) data remains the key tool for States to receive validated passport details in advance of flight arrival.

Reservation systems are also changing and can include other elements of a passenger’s travel routing, such as a hotel reservation or rental car booking.

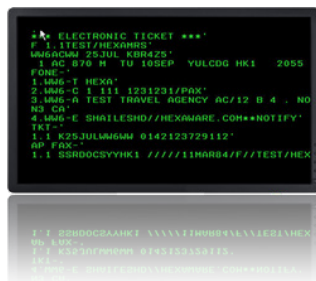
2 Benefits of PNR

PNR was traditionally used by Customs authorities to help identify contraband and smuggling routes. Today, PNR is being used for a wide range of law enforcement measures, including preventing terrorism and organized crime. PNR plays an important role in risk assessment and analysis and helps States to identify unknown or suspicious people, trends or patterns. Analysis of PNR data requires strong analytical computing tools to identify unknown travel routing and connections among individuals (including non-travellers) as well between individuals and entities.

3 PNR and the Role of ICAO

Annex 9 – *Facilitation* to the Chicago Convention is the international legal framework regulating Passenger Data Exchange Systems, including for PNR. ICAO publishes and maintains the Guidelines on PNR Data as ICAO Doc 9944, which contains practical information about PNR transfer, including the data elements that can be requested. Each Contracting State requiring PNR data shall align its data requirements and its handling of such data with the ICAO PNR Guidelines.

4 An Overview of PNR Data Transfer



Custom Border at Destination

PNR data for all passengers on a given flight are sent together in one message, though single messages are sometimes parcelled to make PNR data transfer more economical. Typically, States request that the first PNR message is sent to them 48 hours before departure, with additional messages being requested up to the time of departure of the aircraft. PNR data is collected and stored in multiple databases and can thus be sent from multiple sources, including an airline Reservation System (RES), a Global Distribution System (GDS), a tour operator and an airline Departure Control System (DCS).

Some reservations are extremely rich in information, while other PNR's may contain as little information as a name, itinerary, generic contact information and ticket indicator. For example, a reservation can include all types of information on a passenger including full name, passport details, contact and

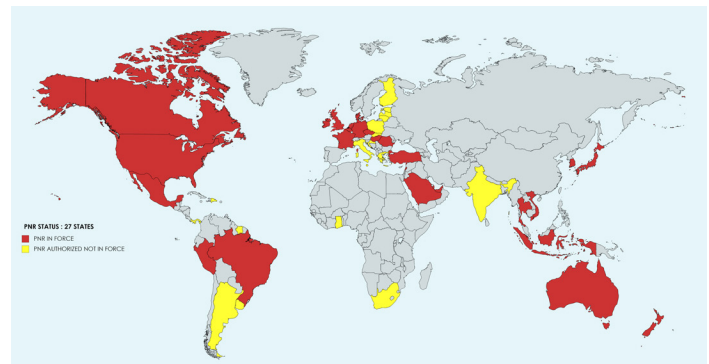
address information, frequent flyer data, form of payment, seat assignment, baggage allowance, special service request, etc., whereas a tour operator can “block” a ticket only with its own generic contact information (not the passengers), creating a ticket indicator on an itinerary for a charter flight. The name of the passenger and other details are then only made known to the operating carrier on the day of departure when the passenger presents the coupon for travel.

There is no PNR for crew.

5 PNR and Data Privacy

The reasons for requiring PNR data should be clearly expressed in the appropriate laws or regulations of the State or in explanatory material accompanying such laws or regulations, as appropriate. PNR is commercial data of a personal nature which a traveller would not normally provide to a State, unless for example, there is a visa requirement.

Because PNR data is sensitive, many States have instituted strong data protection and privacy laws and measures to ensure that PNR is processed lawfully and in the interests of the general public. Currently there are conflicts of laws regarding the transfer of PNR data in which the law of one State requests PNR data from an airline, whereas the law of another State inhibits the transfer of this data to other States. The human rights considerations for Member States regarding the collection, transmission, use, retention and sharing of PNR data are quite complex. One common baseline which Member States could apply might be the International Covenant on the Protection of Civil and Political Rights, a universal instrument, that has placed a prohibition on arbitrary or unlawful interference with human rights and fundamental freedoms.



Status of PNR - September 2019

For more information on the international regulatory framework and API and PNR message guidance materials please consult <https://www.icao.int/Security/FAL/ANNEX9/Pages/Publications.aspx>



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