International Civil Aviation Organization

WORKING PAPER

ATConf/7-WP/61
25/9/26
(Information Paper)
English only

SEVENTH WORLDWIDE AIR TRANSPORT CONFERENCE (ATCONF/7)

Montréal, HQ, 16 to 20 November 2026

Agenda Item 3: Strengthening regulatory and institutional frameworks
3.1: Strengthening regulatory oversight and evolving institutional frameworks

STRENGTHENING AVIATION SECURITY QUALITY CONTROL REGULATORY OVERSIGHT: ADDRESSING SUPPLY CHAIN VULNERABILITIES THROUGH REGULATED IN-FLIGHT SUPPLIES PROVIDERS SECURITY PROGRAMME

(Presented by Indonesia)

EXECUTIVE SUMMARY

This paper presents Indonesia's experience in strengthening aviation security oversight of regulated in-flight supplies providers. National aviation security quality control audits identified several vulnerabilities in in-flight catering operations, including inadequate control of prohibited items, inconsistent screening and documentation of catering carts, deficiencies in tamper-evident sealing and chain-of-custody controls, and the absence of formal internal security quality control measures.

In response to these findings, Indonesia amended its National Civil Aviation Security Programme (NCASP) to establish a direct regulatory oversight framework for regulated in-flight supplies providers. Under the amended framework, regulated providers are required to develop, implement, and maintain an Aviation Security Programme approved by the Appropriate Authority. The framework is complemented by standardized security audits, unannounced inspections, and mandatory internal Quality Control Programmes.

The Indonesian experience demonstrates the importance of direct regulatory oversight and systematic quality control in strengthening a secure supply chain for inflight supplies and ensuring the implementation of security measures by regulated in-flight supplies providers.

1. INTRODUCTION

1.1 Aviation security measures are key elements to ensure every flight is safe and secure. Passenger and cargo screening has historically received the primary regulatory focus. However, the security of the aviation supply chain, particularly catering, stores and supplies, also requires strict regulatory compliance, continuous regulatory oversight, and effective coordination among stakeholders. In-flight supplies providers manage significant volumes of goods, equipment, and vehicles that require stringent security controls prior to accessing security restricted areas (SRAs) and boarding aircraft.

1.2 The Indonesian National Civil Aviation Security Programme (NCASP) previously regulated in-flight supplies operations through indirect oversight model, relying on aircraft operators to contractually enforce security controls on third-party providers. However, national aviation security quality

control audits identified operational vulnerabilities within this framework, including deficiencies in the control of prohibited items and inconsistent screening procedures for catering carts. These findings highlighted the inherent limitations of delegating primary oversight responsibilities to aircraft operators rather than regulating in-flight supplies providers.

1.3 To address these supply chain vulnerabilities, Indonesia transitioned to direct regulatory framework. This paper evaluates the audit findings concerning in-flight catering operations and outlines the policy rationale for amending the NCASP to require all regulated in-flight supplies providers to develop, implement, and maintain an Aviation Security Programme approved by Appropriate Authority.

2. DISCUSSION

2.1 In compliance with the International Civil Aviation Organization (ICAO) Annex 17 Standard 4.6.6, quality control activities are conducted to verify the effective implementation of aviation security measures and to ensure that catering, stores and supplies intended for carriage on commercial flights are subjected to appropriate security controls. Such controls may include a supply chain security process or screening, followed by protection until the supplies are loaded onto the aircraft.

2.2 A national aviation security quality control audit conducted on an in-flight catering facility revealed critical operational security deficiencies. Four major vulnerabilities were identified:

2.2.1 **Inadequate or inconsistent control of prohibited items within production areas.** The presence of uncontrolled prohibited items in a catering facility introduces a high-risk security exposure, as personnel, sub-contractors, and third-party vendors may have direct access to equipment and goods within the secure supply chain.

2.2.2 **Inconsistent security screening of catering carts.** Security screening and documentation procedures were found to be inconsistent. The effectiveness of security control relied on individual practices rather than on a standardized and reliable security system.

2.2.3 **Deficiencies in tamper-evident sealing and chain-of-custody control.** Security seals are an important mechanism for maintaining the integrity of catering carts after security controls have been completed. A seal should not merely function as a physical label, it should form part of a chain-of-custody system that enables verifiable tracking and verification of cart integrity from initial security clearance through transport to final aircraft loading.

2.2.4 **Absence of formal internal security quality control measures.** Another vulnerability identified was the absence of formal internal security quality control measures within certain in-flight supplies providers. In the absence of effective internal quality-control measures, security compliance relied primarily on external inspections or regulatory audits.

2.3 Re-evaluating institutional frameworks and revising the NCASP

2.3.1 In response to the audit findings, Indonesia recognized that supply chain security required comprehensive regulatory reform. Relying primarily on contractual arrangements between aircraft operators and in-fight supplies providers was insufficient to ensure national compliance. Consequently, the Indonesian NCASP was amended to require the in-flight supplies providers to develop, implement, and maintain an approved Security Programme approved by the Appropriate Authority.

2.3.2 Guidance for the development of In-Flight Supplies Provider Security Programme is incorporated in ICAO Document 8973. The written programme should be presented in narrative format and should describe how the in-flight supplies provider meets each of the requirements specified in the corresponding chapter of the relevant NCASP.

2.4 Strengthening Quality Control Regulatory Oversight

2.4.1 Direct regulation requires an equivalent enhancement of Quality Control (QC) mechanisms. Under this framework, the in-flight supplies provider becomes directly accountable for compliance with aviation-security requirements.

2.4.2 Standardized Security Audits: The appropriate authority shall establish standardized compliance requirements applicable to all regulated in-flight supplies provider. This measure mitigates operational inconsistencies and ensure that each in-flight supplies provider maintains uniform and effective security controls across all aircraft operators it serves.

2.4.3 Unannounced Inspections: The appropriate authority shall execute unannounced security inspections to assess day-to-day operational compliance. This will provide a more accurate and real-time evaluation of the effectiveness of security measures beyond scheduled formal audits.

2.4.4 Mandatory Internal Quality Control Frameworks: The establishment and implementation of an internal Quality Control Programme shall be a mandatory regulatory requirement for all regulated in-flight supplies provider. As part of the national quality control programme, the appropriate authority will systematically audit and evaluate the operational effectiveness of each in-flight supplies provider’s internal compliance system.

3. CONCLUSION

3.1 The quality control audit findings show that aviation security vulnerabilities can arise at multiple points across the in-flight supply chain. Furthermore, these outcomes underscore the inherent limitations of indirect regulatory models, in which security responsibilities are delegated through multi-tiered commercial arrangements rather than enforced through direct oversight.

3.2 To address these vulnerabilities, Indonesia amended the NCASP to require regulated in-flight supplies providers servicing international commercial flights to develop, implement, and maintain an entity-specific Aviation Security Programme. The programme must align with the applicable NCASP provisions and be formally submitted for approval by the Director General of Civil Aviation. The implementation of direct regulatory oversight provides the Appropriate Authority with a standardized and consistent framework to systematically evaluate, audit, and monitor the security performance and regulatory compliance of in-flight supply providers.

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