FALP/14-WP/9
6/3/26

国际民用航空组织

工作文件

简化手续专家组（FALP）

第十四次会议

2026年4月20日至24日，蒙特利尔

议程项目 5: 2026-2028年业务计划的新战略目标 —“不让任何国家掉队”

制定国际民航组织DOC 9303号文件合规方案

(由新西兰作为国际民航组织实施和能力建设工作组（ICBWG）主席提交)

摘要

本文件概述建立一项可资成员国检验其旅行证件是否符合国际民航组织Doc 9303号文件《机读旅行证件》规范的方案方面取得的进展。介绍实施和能力建设工作组（ICBWG）相关分组开展的工作。本工作文件及其附录还描述了基于国际标准化组织（ISO）与国际电工委员会（IEC）联合制定的检测和校准实验室国际标准ISO/IEC 17025的检测中心认可框架。标准ISO/IEC 17025规定了对检测和校准实验室技术能力、公正性和操作一致性的通行要求。该框架旨在保证检测中心的技术能力、可靠的结果，并由国际民航组织治理结构结合有效实施合规方案的其他必要考虑，对之实行全球承认的监督与认可。

简化手续专家组的行动:
专家组的行动在下文第5段。

1. 引言

1.1 旅行者身份识别方案技术咨询组（TAG/TRIP）和秘书处在实施和能力建设工作组（ICBWG）的支持下，15 年多以来一直致力于制定国际民航组织 Doc 9303 号文件合规方案。该合规方案的总体目标是确保各国机读旅行证件（MRTD）和、或电子机读旅行证件（eMRTD）符合该文件各部分的规范，以确保实现全球互操作性。

1.2 符合国际民航组织标准且具备全球可互操作性的机读旅行证件和电子机读旅行证件，其效益具有群体性、积淀性的和普适性。制定 Doc9303 号文件合规方案，将增强全球对流通的机读旅行证件和电子机读旅行证件的信任，显著改进边控的完整性和通关便利性，从而为增强对旅

行证件签发工作的信任和边境通关流程自动化铺平道路。此外，还将令各国更加放心其对旅行证件签发项目的公共投资，能为本国及其公民带来简化手续和安保双重回报。概念上就是制定一个合规方案框架，各国可自愿选来检验其机读旅行证件和、或电子机读旅行证件是否符合国际民航组织 Doc 9303 号文件中所载的各项技术规范。

2. 背景

2.1 多年来，实施和能力建设工作组不合规问题分组查出多起旅行证件不合规的情况，其中包括与电子机读旅行证件基于芯片原件相关的缺陷。此类不合规情况进一步凸显了建立 Doc 9303 号文件合规方案的紧迫性：一方面是因为已有 160 多个国家在签发电子机读旅行证件，另一方面则因为各国已开始通过从电子机读旅行证件中提取数据集的方式，为其公民提供数字旅行凭证（DTC）签发支持。若作为基础的电子机读旅行证件本身存在缺陷，那么 DTC 虚拟凭证的部署也将随之出现瑕疵。

2.2 在此背景下，还应指出，Doc 9303 号文件 — 机读旅行证件的技术规范并不具备作为附件 9 —《简化手续》一部分通过的国际标准所具有的条件性约束力。从严格的法律角度看，Doc 9303 号文件中的规范并不是理事会依照《芝加哥公约》（第三十七条、第三十八条、第五十四条和第九十条）规定的程序通过的，因此不受第三十八条正式通知差异的规定约束。从这个意义上说，对 Doc 9303 号文件的遵守事实上是通过在边境口岸的查验接受得以执行的，所以需要实现全球互操作性。同时，旅行证件签发机关也在寻求一种能确定其所发证件符合 Doc 9303 号文件规范的自愿性方法。因此，国际民航组织 Doc 9303 号文件合规方案可间接支持产生遵守 Doc 9303 号文件义务的件 9 一整套标准的实施。[1]

3. 讨论

3.1 在 2023 年 10 月举行的旅行者身份识别方案技术咨询小组第四次会议（TAG/TRIP/4）上，秘书处转达了国际民航组织法律事务和对外关系局（LEB）提供的信息，其中指出，制定国际民航组织 Doc 9303 号文件合规方案是一个政策而非法律问题。秘书处建议在实施和能力建设工作组分管小组内重振对该议题的对话。TAG/TRIP/4 次会议最后认定，推进国际民航组织 Doc 9303 号文件合规方案的制定工作势在必行，赞同将继续制定 Doc 9303 号文件合规方案作为实施和能力建设工作组的工作项目。

3.2 在 TAG/TRIP/4 次会议与 2025 年 11 月举行的旅行者身份识别方案技术咨询小组第五次会议（TAG/TRIP/5）之间， ICBWG 工作组分组已召开超过 15 次会议，致力于建立一个治理框架，其中将由国际民航组织的正式治理结构对国际民航组织 Doc 9303 号文件合规方案实行监督，并按具体标准对公、私检测中心进行认可。

3.3 ICBWG 工作组在讨论中确定一个模式，即：将由国际民航组织对协助成员国检测旅行证件的检测中心立下加入国际民航组织检测中心网络的三条主要标准，具体为:

a) 获得ISO/IEC 17025检测和校准实验室能力的通用要求认证。ISO/IEC 17025 确保检测实验室的技术能力、公正性和可靠性，并吸收了 ISO/IEC 9001质量管理体系的相关内容。

[1] 对附件9 – 《简化手续》第30次修订：标准 3.10、3.10.2、3.10.3、3.10.4、3.13、3.13.1、3.13.2、3.13.3、3.13.4。

b) 有能力执行Doc 9303号文件各部分所载不同检测规范/方法，作为各测试中心ISO/IEC 17025认证范围的一部分。同时承认某些检测中心可能仅具有进行某些专项检测的资质; 和

c) 成功参加监督国际民航组织Doc 9303号文件合规方案的国际民航组织治理结构组织的实验室间比对检测。

3.4 如所附提案进一步阐述的，国际民航组织仅承认经 ISO/IEC 17025 认可的检测中心。这些检测中心须由全球认可合作组织签约认可服务机构按 ISO/IEC 17025 标准予以认可。认可机构还将确保检测中心有能力执行 Doc 9303 号文件规定的具体检测规范/方法。全球认可合作组织成员国认可机构有，例如:

- 澳大利亚国家检测机构协会（NATA）;
- 法国国家认可委员会（COFRAC）;
- 德国国家认可委员会（DAkkS）;
- 联合王国认可服务组织（UKAS）; 和
- 美国国家标准协会（ANSI）国家认可委员会（ANAB）和美国实验室认可协会（A2LA）。

3.5 国际民航组织方面信赖认可服务机构所做的工作，因为全球认可合作组织确保认可服务机构符合下列标准，包括但不限于:

- 是签署了全球认可合作组织互认协议（MRA）的国家或地区认可机构的成员;
- 保持符合 ISO/IEC 17011，合格评定：对认可合格评定机构的认可机构之通行要求;
- 开展 ISO/IEC 17025 评定工作，包括针对特定行业的补充性专项要求并采用国际民航组织机读旅行证件/电子机读旅行证件全球合格检测计划; 和
- 根据标准 ISO/IEC 17011 ，保持足够数量的胜任人员，以开展对经认可检测中心的监督评估工作。

3.6 2025 年 11 月，TAG/TRIP/5 次会议核可本工作文件附录中所载 Doc 9303 号文件合规方案治理结构与框架，并支持将该拟议治理框架提交简化手续专家组第十四次会议（FALP/14）和航空运输委员会（ATC），供其核准并就进一步发展提供指导。TAG/TRIP 与会代表团普遍支持建立合规方案的提议，同时指出这需要专项资源，并鼓励 ICBWG 工作组密切参与进来。

4. 今后的工作

4.1 制定合规方案的下一步工作包括发出信息征询书（RFI），以查明全球范围持有 ISO/IEC 17025 认证或有意满足这项要求的潜在检测中心（实验室）。信息征询书还有助于核实检测中心自报的各项能力，能否实际执行国际民航组织认可范围内的 Doc 9303 号文件相关检测方法。根据信息征询书的结果，国际民航组织将得以评估有多少检测中心可具备加入国际民航组织检测中心网络的资格，以及如何满足 ISO/IEC 17025 认可范围的要求。

4.2 与此同时，国际民航组织将继续为该方案投入运行做准备，包括确立其治理结构（如指导委员会），负责监督、认可检测中心和审查合规检测结果。国际民航组织还将支持完成和发布全球合格检测计划，其中，将整合并澄清合规方案拟用的 Doc 9303 号文件检测规范。

4.3 此外，简化手续科将与国际民航组织法律事务和对外关系局（法律局）协商，法律局此前曾表示愿意协助制定一份将由各检测中心与国际民航组织签订的标准化法律协议。该协议一经敲定并签署，将确保国际民航组织对检测结果不负任何责任，而是由检测中心对进行检测并向各国和国际民航组织报告检测结果承担全部法律责任。后续准备工作包括：为实验室间比对检测制定参考旅行证件样本集，以及设计测试结果认可机制，以及发布测试中心网络名录。

5. 建议

5.1 请简化手续专家组:

a) 核准本工作文件的内容，特别是第4段提出的后续步骤，以及附录中“国际民航组织Doc 9303号文件合规方案治理结构与框架”文件的内容;

b) 就制定Doc 9303号文件合规方案提供进一步建议和指导; 和

c) 核准秘书处向第238届会议航空运输委员会（ATC）报告国际民航组织Doc 9303号文件合规方案进展情况的计划。

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FALP/14-WP/22
Appendix
English only

APPENDIX

ICAO Doc 9303 Compliance Programme:

Governance Structure and Framework

January 2026

Release Control

Release	Date	Description
0.20		
0.30		
0.40	July 31, 2025	
0.50	August 14, 2025	
0.60	August 20, 2025	Summary of mini-group work done by: Chamberlain, Dion Dermarkar, Christiane Hornek, Christopher Jobard, Stephane Wood, Tyler
0.70	January 27, 2026	

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1. Preface

The International Civil Aviation Organization Technical Advisory Group on the Traveller Identification Programme (TAG/TRIP) and the Secretariat, supported by the Implementation and Capacity Building Working Group (ICBWG), are pursuing the establishment of an ICAO Doc 9303 Compliance Programme.

The overall objective of an ICAO Doc 9303 Compliance Programme is to ensure global interoperability of a State's Machine Readable Travel Document (MRTD) and/or electronic Machine Readable Travel Document (eMRTD) in accordance with various Parts of Doc 9303. The concept is to develop a framework for a Compliance Programme in which States can voluntarily choose to test whether their MRTDs and/or eMRTDs comply with the specifications contained in ICAO Doc 9303.

The benefits of ICAO compliant and globally interoperable MRTDs and eMRTDs are collective, cumulative and universal. Achieving a Doc 9303 Compliance Programme would enhance global trust in MRTDs/eMRTDs in circulation and lead to a measurable improvement in border integrity and facilitation, paving the way for increased trust in travel document issuance and the automation of border clearance processes. Additionally, it would provide States with enhanced assurance that the public investments in their document issuance programmes provide their States and citizens with facilitation and security returns.

Over the years, the ICBWG Non-Compliance Sub-Group has identified multiple cases of non-compliant travel documents, including defects related to chip-based elements of eMRTDs. Such cases of non-compliance create additional urgency for the establishment of a Doc 9303 Compliance Programme, on the one hand because more than 160 States are issuing eMRTDs, and on the other hand, because States are beginning to support the issuance of Digital Travel Credentials (DTC) for their citizens through the extraction of data sets from eMRTDs. If the underlying eMRTD contains defects, then the deployment of DTC Virtual Credentials will be flawed as well.

2. Background

The concept that ICAO Member States could test if their travel documents comply with the specifications set out by Doc 9303, *Machine Readable Travel Documents* has been discussed for nearly two decades. In particular, the TAG/TRIP ICBWG has developed the concept over time.

Since 1980, ICAO has published multiple editions of Doc 9303, detailing specifications to increase security, improve facilitation, and ensure global interoperability for MRTDs. Significant time and resources from both the public and private sectors have gone into the development of these specifications. Despite this investment, States still have no ability to test whether their MRTDs comply with Doc 9303. States have increasingly approached ICAO seeking official confirmation of Doc 9303 compliance for their MRTDs, which indicates that a clear need of the travel document and border management community is not being met.

An ICAO Doc 9303 Compliance Programme designed, overseen and endorsed by ICAO and the TAG/TRIP, will meet this need. Such a scheme can provide assurance to States that their MRTD investment will achieve its intended outcome – a Doc 9303 compliant travel document or other travel credential[1] issued in accordance with Doc 9303 specifications.

Beginning in 2011, ICBWG submitted a series of working papers[2] to consecutive TAG meetings outlining elements of a Doc 9303 Compliance Programme. By 2018, the Secretariat had taken over the responsibility of providing a status update of the Doc 9303 Compliance Programme to TAG. In 2021, at TAG/TRIP/3, the Secretariat in Working Paper 3, outlined a framework which could be pursued to establish a Doc 9303 Compliance Programme, through the formation of an ICAO Network of Testing Centres, consisting of public and private members qualified to conduct conformance tests with the test methodologies contained in Doc 9303. This paper raised some outstanding items that needed resolution, including how testing centers would be accredited, how legal agreements between ICAO and testing centers would be signed and what type of ICAO governance mechanism would have oversight over the Compliance Programme.

Substantial efforts and progress have been made in the development of testing methodologies and standards for travel documents. In this context the work of the International Organization for Standardization (ISO) JTC 1/SC 17/Working Group 3 (WG3) should be recognized and highlighted.

The main use cases of the Compliance Programme include:

a) a Member State's issuing authority has an existing MRTD or eMRTD and wishes to verify Doc 9303 compliance; or

b) a Member State's issuing authority is going to market for an MRTD or eMRTD and wishes to clarify compliance as part of the contract award and/or the delivery phase.

3. Programme Scope

The Doc 9303 Compliance Programme is designed to provide a voluntary framework for Member States to ascertain whether the physical and electronic aspects of their MRTDs are issued in accordance with the specifications in Doc 9303. This would include both travel documents the State has personalized through their issuing authority and specimens prepared by the potential supplier.

This does not prevent vendors/manufacturers to test their own products with accredited testing centers in a confidential manner. However, ICAO will only recognize compliance tests conducted

[1] For example, a Machine Readable Visa (MRV) and a Digital Travel Authorization (DTA) are specified by Doc 9303 but are not considered "Travel documents" according to Doc 9303 and Annex 9 – Facilitation.
[2] TAG/TRIP/3-WP/3, Development of an ICAO Doc 9303 Compliance Programme.
TAG/TRIP/2-WP/9, Document 9303 compliance scheme.
TAG/TRIP/1-WP/23, Doc 9303 compliance scheme.
TAG/MRTD/22-WP/16, Doc. 9303 compliance programme.
TAG/MRTD/21-WP/10, Doc. 9303 compliance programme.
TAG/MRTD/20-WP/11, Doc 9303 compliance programme.

by Member States against approved test specifications/methodologies published as part of Doc 9303 and the ICAO global conformance test plan for MRTDs/eMRTDs, and only after these test results have been submitted to ICAO.

The Compliance Programme is foreseen to encompass both MRTDs and eMRTDs, in other words both the physical and electronic aspects of travel documents. In preparing the programme, it has been recognized that ICAO Member States have a greater need in testing for electronic components of eMRTDs related Doc 9303 Parts 9-12, than for physical MRTD components. At the same time, it is recognized that eMRTD tests are more complex than testing for physical aspects related to Doc 9303 Parts 3 and 4. In establishing a Compliance Programme, all stakeholders recognize that a test, whether conducted on a specimen, batch of specimens and/or batches of actual travel documents represents only a snapshot of the tested document at the time of testing. For example, a compliant document having passed a test is subject to the degradation of the document's physical and electronic aspects over time. Nonetheless, ICAO considers the value of recognizing compliance tests as vital to providing support to global interoperability at borders, particularly as automated and digital aspects of border control are increasing.

Compliance will and can only be measured against approved MRTD/eMRTD test specifications/methodologies formally recognized as part of Doc 9303. ICAO will publish a global conformance test plan, referencing and explaining all existing Doc 9303 test specifications/methodologies for compliance testing for MRTDs/eMRTDs.

Over time it is foreseen that the Compliance Programme will be expanded to include testing for all types of MRTD form factors and digital credentials (DTC, ICAO Datastructure for Barcode (IDB), etc.) issued in accordance with Doc 9303, as test methodologies are developed.

Additionally, the ICBWG Non-Compliance Sub-group has suggested a review of Doc 9303, Part 2, including the development of compliance testing for physical security features in the scope of the Compliance Programme. This is pending the update of Doc 9303, Part 2, including with commensurate test specifications.

4. Conditions Needed to Create Success

There are a number of criteria needed to create success for the Compliance Programme, these include further developing the programme structure and framework for:

1. Accreditation Framework for Testing Centers;
2. Testing Criteria;
3. Oversight and Recognition of Testing Centers by ICAO Governance Structure;
4. Legal Agreements between ICAO and Testing Centers; and
5. Visibility for the Compliance Programme.

Accreditation Framework for Testing Centers

The testing of MRTDs and eMRTDs needs to be conducted by credible and technically capable testing centers. ICAO will need to establish a formalized governance mechanism overseeing the

ICAO Compliance Programme providing recognition of the testing centers according to specific criteria.

Private and public testing centers with experience in testing MRTDs and eMRTDs for compliance against ICAO Doc 9303 specifications exist. Some testing centers have preliminarily been identified and have expressed an interest in joining an "ICAO Network of Testing Centers".

Critically, ICAO will require three main criteria for a test center's membership in the ICAO Network of Testing Centers, namely:

1. Accreditation to ISO/IEC 17025, *General Requirements for the Competence of Testing and Calibration Laboratories*[3];

2. Ability to perform various test specifications/methodologies contained in each Part of Doc 9303, as part of the respective testing center's ISO/IEC 17025 accreditation scope[4]; and

3. Successful participation in Inter-Laboratory Testing organized by the ICAO Governance Structure overseeing the ICAO Doc 9303 Compliance Programme.

ICAO will only recognize test centers with ISO/IEC 17025 accreditation. The test centers are accredited to ISO/IEC 17025 by accreditation bodies who must be Global Accreditation Cooperation Incorporated signatory accreditation service organizations[5]. The accreditation bodies will also ensure that test centers are able to perform specific Doc 9303 test specifications/methodologies.

Examples of national Global Accreditation Cooperation Incorporated accreditation bodies are:

- National Association of Testing Authorities (NATA) in Australia;
- COFRAC in France;
- DAkkS in Germany;
- UK Accreditation Service (UKAS) in the United Kingdom; and
- ANSI National Accreditation Board (ANAB) and the American Association for Laboratory Accreditation (A2LA) in the United States.

In turn, ICAO can rely on the work done by the accreditation services because the Global Accreditation Cooperation Incorporated ensures the following criteria for the accreditation service organizations, including but not limited to:

1. Being a member of a national or regional accreditation body that is a signatory to the Global Accreditation Cooperation Incorporated Mutual Recognition Arrangement (MRA).

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[3] ISO/IEC 17025 ensures the competence, impartiality and reliability of testing laboratories and incorporates relevant aspects of both ISO/IEC 9001, *Quality Management Systems* and ISO/IEC 27001, *Management of Information Security.*

[4] It is recognized that certain testing centers might only qualify to conduct certain specialized tests.

[5] A directory of Full Member MRA Signatories can be found here: https://ilac.org/signatory-search/

2. Maintaining compliance with ISO/IEC 17011, *Conformity assessment: General requirements for accreditation bodies accrediting conformity assessment bodies*.

3. Performing ISO/IEC 17025 assessments, including supplemental specific program requirements for unique industries using the ICAO global conformance test plan for MRTDs/eMRTDs.

4. Maintaining a sufficient number of competent personnel to conduct assessment work in regard to monitoring accredited testing centers, per ISO/IEC 17011.

1. ISO/IEC 17025 Accreditation Cycle

Any test center or laboratory wishing to become a recognized member of the ICAO Doc 9303 Compliance Programme needs to go undergo initial accreditation consisting of a comprehensive inceptive assessment of the test center's compliance with ISO/IEC 17025 by the accreditation body. This typically includes:

- Review of the management system.
- Evaluation of implemented methods.
- Site visits and operational observations.

If the test center is compliant, accreditation may be granted for a period of up to five years, and a sample of the scope of accreditation must be assessed on-site at least every two years. As an example, the accreditation service performs monitoring assessments about every 15 months to maintain assurance of quality and technical expertise of the testing center, followed by a separate requalification audit, which can result in a five-year renewal of the accreditation.

Testing Criteria

There is no single Doc 9303 test specification/methodology that proves complete compliance with Doc 9303. A State may choose to conduct different types of tests to test compliance for different aspects of its documents, for example electronic or physical components. This also means that recognition by ICAO of the Member State's test result, occurs per specific test.

The TAG/TRIP New Technologies Working Group (NTWG) supported by ISO Working Group 3/Task Force 4 is working on a global conformance test plan for MRTDs/eMRTDs to streamline the existing test specifications and methodologies contained in Doc 9303 and accompanying Technical Reports. Once published, the global conformance test plan will be a summary document making it easier for Member States to understand which test methods apply to which parts of Doc 9303. It is foreseen that the summary of the test methods is to be published with the 9th Edition of Doc 9303 and will subsequently become a reference document for the Compliance Programme.

Oversight and Recognition of Testing Centers by ICAO Governance Structure

A "Governance Structure" for the Doc 9303 Compliance Programme would be responsible for overseeing the criteria related to the above-mentioned accreditation process, including the Doc 9303 accreditation scope, as conducted by Global Accreditation Cooperation Incorporated accreditation bodies.

ICAO and its Member States, in particular TAG/TRIP members, would create a formal Governance Structure for the ICAO Doc 9303 Compliance Programme. For example, this could be termed a "Steering Committee" or a "Compliance Programme Board". In some terms a Steering Committee could be roughly compared to the ICAO Public Key Directory (PKD) Board which oversees the administration of the PKD. For example, the Steering Committee could potentially consist of seven or five representatives from TAG/TRIP Member States, with equal voting rights, with decisions taken on a simple majority basis, supported by the Secretariat.

The Steering Committee would review the prospective test center's ISO/IEC 17025 accreditation letter and accreditation scope. The Committee would then vote to "recognize" test centers. A positive vote would result in the testing center becoming a recognized member of the ICAO Network of Testing Centers, subject to a legal agreement signed with ICAO and commensurate re-qualification.

In addition, the Steering Committee would have the discretion to recognize specific tests conducted by test centres with ISO 17025 accreditation, but which are conducting some tests outside the existing accreditation scope. Recognition of such test results will be taken on a case by case basis and will require additional information which may include specific criteria as described below:

Category	Examples of evidence
Technical Expertise	Regular participation to the SC17/WG3 and dedicated TF4 meetings Number of conducted tests in the 5 past years Customers testimonials
Mastery of test methods	Regular participation to the SC17/WG3 and dedicated TF4 meetings Number of conducted tests in the 5 past years Customers testimonials Participation in the ICAO Interlaboratory Testing Program

The exception is a temporary measure to as a test center is working to expand the scope of accreditation. The testing center must undertake the necessary steps of extending the scope of accreditation to include these additional specification/ methodologies.

As part of ICAO's due diligence and oversight, the ICAO Steering Committee will need to ensure that every Member in the Network of Testing Centers submits updated ISO/IEC 17025 accreditation letters for each accreditation cycle. The Steering Committee should be aware of the test center's ISO/IEC 17025 accreditation, audit and requalification cycle, as well as its Doc 9303 accreditation scope status.

2. Ensuring ICAO's Doc 9303 Test Specifications are part of the ISO/IEC 17025 Accreditation Scope

ICAO will issue a Request for Information (RFI) through which prospective testing centers (laboratories) around the world can provide information about their existing ISO/IEC 17025 accreditation, or their intent to do so, as well as their abilities to test for the ICAO Doc 9303 scope of accreditation. The results of the RFI will provide ICAO with more information to better understand how many testing centers might qualify for the membership in the Network of Testing Centers.

Appendices A and B contain more information on how the ICAO Doc 9303 accreditation scope will be applied to the vetting process of the ICAO Network of Testing Centers. These appendices will help to shape the Terms of Reference for the Steering Committee and the respective legal agreements signed between ICAO and the respective members of the ICAO Network of Testing Centers.

The Steering Committee will support the development of reference Travel Document sample sets to be used in inter-laboratory testing. This provides the ICAO Steering Committee with greater assurance that the test centers fulfil the Doc 9303 accreditation scope. The Steering Committee will pay for the initial reference sample sets, with costs to be recovered from test centers who pay membership fees to ICAO.

3. Recognition of Test Results by ICAO Steering Committee

Once an ICAO Member State has conducted test(s) on its MRTDs/eMRTDs it can inform ICAO of the result of the test(s).

If the test result(s) are positive, then the Steering Committee will review the test result(s) and conduct due diligence to check if the underlying accreditation status of the Testing Center(s) involved was valid at the time of testing. On this basis, the Steering Committee could recognize positive test(s) through a letter indicating which compliance tests were fulfilled.

Legal Agreements between ICAO and Testing Centers

To become a member of the ICAO Network, a Testing Center would need to sign a standardized legal agreement with ICAO to ensure that all legal liability and responsibility for the test results reside with the testing center.

ICAO's Legal and External Relations Bureau (LEB) has noted that they would support the drafting of a legal agreement between each Test Center and ICAO to provide the necessary assurances and limitations of liability for ICAO. Once signed, the legal agreement would ensure that ICAO assumes no liability for the results of the testing and that the Test Center assumes full legal responsibility for conducting tests and providing test results to States and ICAO.

In order for ICAO to recognize a test result, the results would need to be shared with ICAO for review by the Doc 9303 Governance Structure. If a State were to refuse to share test results with ICAO, then ICAO would not be able to provide a positive recognition of compliance, i.e. no certificate of compliance.

The application of a moderate annual participation fee for the testing center to be a member in the ICAO Network of Testing Centers, paid to ICAO, would need to a part of the legal agreement.

Visibility for the Compliance Programme

Once part of the ICAO Network, the testing centers could advertise their recognition by ICAO to enhance their business model. In that sense the use of the ICAO logo by the testing centers to market their membership in the ICAO Network of Testing Centers could be considered and is a step that would need to become part of the legal agreement.

The Steering Committee supported by the Secretariat would provide overall Programme Management and guidance to States, including:

- Maintaining, publishing and promoting a list of the ICAO recognized "Network of Testing Centers."

- Consulting States on how to best test MRTDs and eMRTDs. Essentially, ICAO would maintain a "menu" of recognized Testing Center, cross-listed with each center's qualification in specific test areas (scope of testing capability). This is the global conformance test plan for MRTDs/eMRTDs. For example, some testing centers may be able to test for compliance with Parts 3 and 4, whereas other testing centers may be able to test for compliance with Parts 9-12 of Doc 9303.

- Advising States how to plan and budget for the costs of MRTD and eMRTD compliance testing, including in their travel document procurement and business cycles, which would enable States to outsource the payment of the compliance tests to the vendors.

- Recommending States that are testing specimen MRTDs or eMRTDs as part of the procurement process to state the product quality specifications for the document that is intended for acquisition and ensure that the contract is explicit in the requirement that the document must meet Doc 9303 testing requirements. This would include the vendor/contractor providing specimens to the States at a certain quantity for testing. It is important to note that the State is advised to have a direct relationship with the Testing Center in order to avoid ambiguity. It is advisable for the State to identify the Testing Center, for example in coordination with the Steering Committee, and informing the contractor which Testing Center(s) will be used for compliance testing and which test methodologies/specifications will best applied.

An overarching guidance document, something like "Doc 9303 Compliance Programme Guidelines" would need to be developed, with ICBWG support, including information for States on how to plan and budget for compliance tests, in terms of costs, timing and procurement. Further consideration is needed how such guidance would sync with the existing ICBWG guidance materials, including:

- Guidance for Assessing Security of Handling and Issuance of Travel Documents.

- Collection of Best Practices for Acquisition of Machine-Readable Travel Document Goods and Services (Procurement Guide).

- Guidance for Circulating Specimen Travel Documents.

These guidance documents will be publicly available and will provide guidance to States in terms of costs, timing and procurement. As an example, existing language on compliance requests, essentially how States could seek assistance from ICAO, can be taken from previous TAG/TRIP papers (TAG/TRIP/1-WP/23 and others).

ICAO as a whole, the Secretariat, "Steering Committee" and ICBWG members will promote the Doc 9303 Compliance Programme, including at Symposia, Regional Seminars, ICBWG meetings, etc., thereby raising awareness that costs for testing need to be figured into MRTD procurement, based on existing/new Compliance Programme guidance.

5. Other considerations

Role of the ICBWG Non-Compliance Sub-Group

The role of ICBWG Non-Compliance Sub-Group should also be considered. The ICBWG sub-group has conducted MRTD compliance evaluations for more than 10 years and returns evaluations to States via an official ICAO State letter. ICAO could consider referencing the options for compliance tests via the ICAO recognized Network of Testing Centers when issuing State Letters to non-compliant States.

Development of a country mentorship program, in which States with a robust travel document design, development and implementation process can assist States in implementing their MRTD/eMRTD upgrade, i.e. helping to make sure the document is compliant. This can be guided by the ICBWG and the Steering Committee.

Role of the USAP Programme

As part of the Universal Security Audit Programme – Continuous Monitoring Approach (USAP-CMA), States are expected to demonstrate their compliance with some aspects of Doc 9303. In reality this is extremely challenging for an ICAO auditor to determine. It may be that the Doc 9303 Compliance Scheme provides an avenue for States to demonstrate this independently. The role of the USAP audit approach should be considered as part of the scheme's development.

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6. Appendix A: Accreditation Conditions for Test Centers

1. Comply with Conditions and Criteria for Recognition of Test Centers.

2. Operate program in conformance with ISO/IEC 17025.

3. Maintain status as Accredited Test Center under ISO/IEC 17025.

4. Operate testing operations for MRTDs and eMRTDs with the scope of accreditation claimed.

5. Complete and sign the application for recognition of Test Centers.

6. Complete and submit results from ICAO Test Books.

7. Submit quality management system documentation and signed application to ICAO

To serve as a Test Center (TC) for the ICAO Doc 9303 Compliance Programme, a TC shall agree in writing to the following requirements:

General Requirements:

1. Always comply with the conditions and criteria for recognition of test centers as set forth by the ICAO Steering Committee and the legal agreement with ICAO.

2. Operate the test center MRTD and/or eMRTD testing program in accordance with ISO/IEC 17025 “General Requirements for the competence of testing and calibration labs” and the claimed scope (s) of accreditation.

3. Maintain its status as an accredited ISO/IEC 17025 TC and a comply with notification on accreditation status to in writing, within 30 days of any change in accreditation status to ICAO.

4. A training program must be established to train all personnel on Doc 9303 test methods claimed for the scope of accreditation under the ICAO Doc 9303 Compliance Programme. All AB personnel testing under the scope of accreditation must be trained using ICAO material prior to performing evaluations and continue to be provided new and refresher courses. As per ISO/IEC 17025, training should be conducted as needed to ensure the TC maintains a sufficient number of competent personnel given the work performed.

Reporting to ICAO:

1. All documentation, processes, systems, records, related to the fulfilment of the requirements of ISO/IEC 17025 shall be included in, referenced from, or linked to the management system.

2. Participate in meetings with the ICAO Steering Committee as necessary as part of continual improvement efforts in the enhanced testing program. During these meetings, the TC will

be expected to brief ICAO on the status of the program, test method common deficiencies, and issues related to the accreditation of laboratories. The Steering Committee and the TC will jointly determine whether the meeting should take place by telephone or in-person.

3. Report to ICAO within 30 days of any major changes that affect the TC's:
    a. Legal, commercial, organizational, or ownership status;
    b. Organization and management, e.g., key managerial staff;
    c. Policies or procedures, where appropriate;
    d. Location;
    e. Personnel, facilities, working environment or other resources, where significant; and
    f. Other such matters that may affect the TC's capability, scope of recognized activities, or compliance with the testing requirements and relevant technical documents.

4. Forward any questions related to MRTD and eMRTD test procedures to ICAO for resolution and abide by the decisions of ICAO relative to the resolution of those questions.

5. Upon request, provide ICAO with electronic copies of test center information including:
    a. ISO/IEC 17025 Accreditation effective date;
    b. ISO/IEC 17025 Accreditation expiration date (if applicable);
    c. Scope of Accreditation and relevant accredited test methods; and,
    d. A list of qualified personnel per ICAO-relevant accredited test methods.

6. Notify ICAO immediately in writing and update the TC's website to document any action that adversely affects the accreditation status of an ICAO-recognized test center.

7. Upon request, provide ICAO with copies of TC assessment documentation related to the claimed scope of accreditation for MRTD and eMRTD testing, including corrective action plans, and documentation of resolution of deficiencies. TCs' consent to this is a condition of their recognition by ICAO.

How a TC will be evaluated:

1. TC operations follow tests method associated with the claimed Doc 9303 scope accreditation.
    a. Ensure that the technical competence of TCs to perform tests required for qualification as outlined in the ICAO Doc 9303 Compliance Programme. This should include ensuring that the list of specific test methods for which the TC was accredited is included within the laboratory's scope of accreditation. This includes recognition of specific test results conducted by test centres with ISO 17025 accreditation, but which are conducting some tests outside the existing accreditation scope.
    b. Ensure that the TC is tracking test methods and results.
    c. Notify ICAO of any observed test method interpretations that require clarification.
    d. Continuously review TC documentation related to TC operations.
    e. Demonstrate the impartiality and freedom of TC management and personnel from any undue internal or external commercial, financial or other pressures and

influences that may adversely affect the quality of their work, as required by ISO/IEC 17025.

NOTE: It is ICAO's expectation that TCs will systematically monitor all aspects of the testing associated with the scope of accreditation listed in the ICAO Doc 9303 Compliance Programme. Documents required to be available, consistent with the requirements of ISO/IEC 17025, shall include but may not be limited to the following:

i) organization chart showing that the responsibilities, authorities, and inter- relationships of all personnel who manage, perform or verify laboratory results are free from influence that may adversely affect the quality of their work;

ii) dates of internal audits, audit findings, and any corrective actions taken;

iii) any customer complaints and corrective action taken;

iv) original testing records containing sufficient information for repeatability, including the names of staff who participated;

v) evidence that laboratory employees participate in and regularly pass ethics and compliance audits; and,

vi) evidence that mechanisms for reporting and responding to attempts to exert undue influence on test results are in place.

2. Provide results of on-site and remote audits by the accreditation body per the accreditation bodies normal evaluation process and timeline as outlined in the ISO/IEC 17011 requirements.

3. Provide evidence that all assessment findings are resolved, and corrective actions have been implemented before granting accreditation to a laboratory.

4. Allow ICAO, at its discretion, to witness any assessments performed for compliance with the requirements of the ICAO Doc 9303 Compliance Programme. ICAO agrees to yield to the accreditation bodies (AB) discretion such when witnessing will occur so as not to disrupt the AB's assessment schedule, and to operate solely as an observer and not participate in any way with the assessment activities of the AB and/or its assessors.

5. Publish and maintain on the TC's website an up-to-date directory identifying the scope of accreditation and all test methods accredited under the ICAO Doc 9303 Compliance Programme. At a minimum, this directory must include the following information:
   a. Provide name of the AB;
   b. Provide scope accreditation and a list of test methods;
   c. TC name, address, and phone number;
   d. TC point of contact;
   e. TC accreditation effective date;
   f. TC accreditation expiration date (as applicable); and,

6. Maintain documentation relevant to the accreditation for at least five years.

7. Abide by the AB's decision on all issues related to compliance to the ICAO Doc 9303 Compliance Programme. The AB cannot delegate fully or partially any decisions related to assessment defects but must consider ICAO recommendations or observations in rendering any decisions on compliance to the ICAO Doc 9303 Compliance Programme.

8. Provide a plan to meet the secure handling of travel documents supplied by vendors that meets the State's material handling requirements. The minimum requirement for storage and handling is listed under the Guidance for Assessing Security of Handling and Issuance of Travel Documents.

9. Participate in a still to be determined ICAO Interlaboratory Testing program.

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7. Appendix B: Conditions for Accreditation Bodies

1. Comply with Conditions and Criteria for Recognition of Accreditation Bodies.

2. Operate program in conformance with ISO/IEC 17011[6].

3. Maintain status as an Global Accreditation Cooperation Incorporated Mutual Recognition Agreement (MRA) signatory.

4. Verify Test Centers are following test methods claimed under scope of accreditation and the requirements of the ICAO Doc 9303 Compliance Programme.

General Requirements:

1. Always comply with the conditions and criteria for recognition of accreditation bodies for the ICAO Doc 9303 Compliance Programme.

2. Operate its accreditation program in accordance with ISO/IEC 17011, "Conformity assessment: General requirements for accreditation bodies accrediting conformity assessment bodies."

3. Maintain its status as a signatory to the Global Accreditation Cooperation Incorporated Mutual Recognition Arrangement (MRA).

4. Within the AB's assessor training program, include training on the current requirements described in the ICAO Doc 9303 Compliance Programme. Assessors must be trained prior to performing assessments and continue to be provided new and refresher courses. As per ISO/IEC 17011, training should be conducted as needed to ensure the AB maintains a sufficient number of competent personnel given the work performed.

Conducting Test Center Assessments:

1. Assess Test Center operations for compliance with the ICAO Doc 9303 Compliance Programme.
    a. Upon a satisfactory outcome, attest to the technical competence of test centers to perform tests required to evaluate MRTDs and eMRTDs as outlined in the ISO/IEC 17025 accreditation scope. This should include ensuring that the list of specific test methods for which the laboratory has been accredited is included within the laboratory's scope of accreditation.
    b. Evaluate processes and procedures related to the performance of the test methods.
    c. Assess documentation demonstrating the impartiality and freedom of laboratory management and personnel from any undue internal or external commercial, financial or other pressures and influences that may adversely affect the quality of their work, as required by ISO/IEC 17025.

        NOTE: It is ICAO's expectation that ABs will systematically monitor the impartiality of test centers on an ongoing basis. Document review, consistent with

[6] Quality management system documentation is contained in Section 5 of ISO/IEC 17011.

the requirements of ISO/IEC 17025, shall include but may not be limited to the following:

i) organization chart showing that the responsibilities, authorities, and inter- relationships of all personnel who manage, perform, or verify laboratory results are free from influence that may adversely affect the quality of their work;

ii) dates of internal audits, audit findings, and any corrective actions taken;

iii) any customer complaints and corrective action taken;

iv) original testing records containing sufficient information for repeatability, including the names of staff who participated;

v) evidence that laboratory employees participate in and regularly pass ethics and compliance audits; and,

vi) evidence that mechanisms for reporting and responding to attempts to exert undue influence on test results are in place.

2. Conduct complete on-site assessments of each laboratory per the Global Accreditation Cooperation Incorporated MRA and ISO/IEC 17011 requirements. On site assessments are anticipated to coincide with the normal onsite audit cycle for the Test Center.

3. Verify that all assessment findings are resolved, and corrective actions have been implemented before granting accreditation to a laboratory.

4. Publish and maintain on the AB's website an up-to-date directory identifying all Testing Centers the AB has accredited. At a minimum, this directory must include the following information:
    a. Provide list of Test Center Names and AB to ICAO for publication;
    b. Test Center name, address, and phone number;
    c. Test Center point of contact;
    d. Accreditation effective date;
    e. Accreditation expiration date (as applicable); and,
    f. Scope of accreditation claimed by the Test Center.

5. Maintain documentation relevant to the Test Center accreditation for at least five years.

6. Assume the responsibility of the laboratory accreditation decision itself; the AB cannot delegate fully or partially the accreditation decision to another organization.

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