



FACILITATION PANEL (FALP)

FOURTEENTH MEETING

Montréal, 20 to 24 April 2026

Agenda Item 3: Amendments to Annex 9 — *Facilitation*

TACKLING PASSENGER DATA NON-STANDARD REQUIREMENTS – PASSENGER MANIFEST AND ADVANCE PASSENGER INFORMATION (API) DATA

(Presented by the International Air Transport Association - IATA)

SUMMARY

A comprehensive international framework pertaining to passenger data programs - namely Advance Passenger Information (API) and Passenger Name Record (PNR) - has been developed over several decades to support swift and efficient national implementation. When a national passenger data program aligns with these global standards, it benefits from full industry support and delivers significant advantages for all stakeholders.

However, as more States implement passenger data programs to meet their international obligations, there has been a noticeable rise in requests on aircraft operators that deviate from the established international framework. Such deviations generate unnecessary operational, IT and administrative costs for aircraft operators, delay the implementation of passenger data programs and hinder global initiatives aiming at digitalizing the passenger journey. ICAO Annex 9 – *Facilitation* is unequivocal in requiring States to adhere to the international passenger data international framework. Additional measures are needed to curb the growing trend of non-standard passenger data requirements, including the requirement for the passenger manifest despite the transmission of API data by aircraft operators.

Actions by the FAL Panel: The Facilitation Panel is invited to:

- take note the information contained in this Working Paper;
- agree on the proposed amendment to Standard and Recommended Practices (SARPs) as detailed in Appendix A; and
- require ICAO to add the assessment of the compliance of Contracting States with the Annex 9 Standard 9.15 (Annex 9 Amendment 30) to the security-related Standard of Annex 9 protocol questions of the ICAO Universal Security Audit Programme Continuous Monitoring Approach (USAP-CMA).

1. INTRODUCTION

1.1 A robust international framework governing passenger data - Advance Passenger Information (API), interactive API (iAPI), and Passenger Name Record (PNR) - has been developed since 1993 and continues to be maintained and improved. This framework facilitates the efficient transmission of passenger data from air aircraft operators to government authorities. It has evolved to include standards, recommended practices, guidelines, technical specifications, and best practice documents. This framework is developed and maintained jointly by government and industry stakeholders; it reflects all parties' interests, capabilities and limitations.

1.2 Three key organizations have shaped this framework: the World Customs Organization (WCO), the International Air Transport Association (IATA), and the International Civil Aviation Organization (ICAO). The framework enables swift, effective and cost-efficient implementation of national passenger data programs, cooperation between States and aircraft operators, global interoperability and connectivity, and the automation of passenger-related air transport processes.

1.3 This global framework is composed of:

- ICAO Annex 9 — *Facilitation*, Standards and Recommended Practices (SARPs) in Chapter 9 Passenger Data Systems;
- Guidelines on API maintained by the WCO/IATA/ICAO Contact Committee, complemented by the UN/EDIFACT PAXLST and CUSRES Implementation Guides;
- ICAO Doc 9303, *Machine Readable Travel Documents* with the technical specifications pertaining to Machine Readable Travel Documents (MRTDs);
- For PNR, the ICAO Doc 9944 *Guidelines on Passenger Name Record (PNR) Data* and the Contact Committee maintains the PNRGOV messages and its Implementation Guides; and
- The three organizations as well make available best practice, videos, explanatory documents, checklists, etc. This material is available on the websites of all three organizations, including the [IATA API-PNR Toolkit](#).

1.4 An increasing number of States are implementing passenger data programs to support their border security, expedite the movement of legitimate travellers, and comply with their international obligations set by the United Nations Security Council, notably Resolutions 2178 (2014) and 2396 (2017), and by ICAO Annex 9 — *Facilitation* (Standards 9.7 and 9.22). However, many are introducing elements and practices that deviate from internationally agreed standards. These non-standard requirements are placing substantial administrative, operational, and financial burdens on the airline industry. The resulting strain consumes valuable resources, affecting aircraft operators and, ultimately, national authorities.

2. DISCUSSION

2.1 Annex 9 clearly establishes that aligning their national passenger data program with global standards is a fundamental responsibility of States. This unequivocal obligation is set forth in several Standards:

- **Standard 9.5:** States must refrain from requiring non-standard data elements from aircraft operators in their API, iAPI, and PNR programs.
- **Standard 9.9:** API systems must conform to internationally recognized formats, including the UN/EDIFACT PAXLST implementation guides and the WCO, IATA, and ICAO API Guidelines.

- **Standard 9.10:** This alignment obligation is reiterated, requiring all API data elements to match the specifications outlined in the WCO/IATA/ICAO API Guidelines.
- **Standard 9.13:** States are required to minimize operational and administrative burdens on aircraft operators when implementing an API system.
- **PNR Requirements:** Annex 9 mandates that PNR-related obligations and data handling must align with ICAO Doc 9944 and the PNRGOV message implementation guides published by WCO, IATA, and ICAO (**Standard 9.22 b and c**).

2.2 Additionally, the Consolidated statement of continuing ICAO policies related to facilitation (ICAO Assembly Resolution A42-17) ‘Urges Member States, in the use of electronic passenger data exchange systems, to ensure that the passenger data requirements conform to international Standards adopted by relevant international organizations and United Nations agencies for this purpose (Appendix D Passenger Data Systems, Action 2)’.

2.3 A passenger data program adhering to the international framework receives support of the airline industry. International alignment enhances global interoperability, reduces friction and streamline airline IT systems that are operating among multiple jurisdictions. It lowers implementation and maintenance costs for all stakeholders and helps keep international travel economically accessible.

2.4 Such alignment also improves API data quality and consistency, while enabling greater automation of passenger-related processes. It as well facilitates the exchange of best practices among States and foster cooperation. Ultimately, alignment reduces the costs and inefficiencies that arise from divergent requirements and resource intensive exchanges between aircraft operators and authorities.

2.5 On the other hand, the impacts on aircraft operators of deviant requirements are significant and multi-dimensional, including:

- Redesign or overhaul of airline IT systems, requiring costly and complex technical adjustments;
- Manual collection of passenger data within the airport environment increases operational burdens, staffing needs, and the risk of errors, while undermining passenger experience and digitalization efforts aimed at delivering seamless travel;
- Heightened exposure to data security vulnerabilities and reputational risks, due to sensitive personal information handling;
- Additional transmission and compliance costs, compounding the high operational expenses of aircraft operators; and
- Generation of dummy data to meet divergent requirements, undermining data integrity.

2.6 The types of non-standard requirements imposed on aircraft operators that do not align with the international framework are various but the most common are:

- requiring data elements not contained or optional in WCO/IATA/ICAO Guidelines on API;
- requiring specific PNR data elements, or requiring filtering;
- requiring passenger manifest despite the transmission of API data;
- API and PNR transmission methods that are not conformed, such as web portals, emails and spreadsheets;

- API and PNR timing and frequency of submission;
- several national agencies requiring the same data, disregarding the Passenger Data Single Window Principle;
- stakeholders without legal mandate, such as airports, requiring passenger data; and
- requiring Crew PNR data and scoping crew in iAPI system.

3. API DATA AND PASSENGER MANIFEST DUPLICATIVE REQUIREMENT

3.1 On the specific requirement for aircraft operators to provide the passenger manifest despite the transmission of API data, Annex 9 is equally clear that API has been developed as an electronic means to handle passenger manifest (Standard 9.9, Note 1) and States shall not require such manifest in paper form or any non-standard electronic format (Standard 9.15).

3.2 Despite the clarity of these Standards, IATA data shows that they are in practice widely disregarded globally. A recent survey of IATA airlines members indicates that many dozens of States across all regions continue to require a passenger manifest, even though they already collect API data, whether in batch or interactive mode, from aircraft operators. In some countries, multiple agencies and individual ports still demand the passenger manifest, up to eight copies in some instances, in addition to API transmission, often in formats that are inconsistent with international Standards. These may include paper forms that do not comply with Annex 9 Appendix B, as well as emails, web portals, and other non-standard mechanisms, with requirements varying by agency.

3.3 Aircraft operators already invest significantly in establishing and maintaining their API systems and in covering the costs associated with transmitting this data. Requiring a passenger manifest in paper or any other additional form is therefore a duplicative process. This added administrative and operational burden also raises concerns regarding compliance with personal data protection laws. Internationally established electronic API systems incorporate structured technical and organizational safeguards to protect passenger data during transmission and upon receipt. By contrast, passenger manifests submitted on paper, by email, or through third-party web portals may not offer comparable protections (creating higher risks of loss, misdirection, uncontrolled forwarding or downloading, copying, and onward disclosure) and run counter to the principle of data minimization.

3.4 As with other non-standard requirements, these practices lead to lengthy and resource-intensive exchanges between aircraft operators attempting to discourage such deviations and authorities. When aircraft operators do not provide a passenger manifest despite having transmitted API data, they may face threats of operational fines, potential exposure to penalties under data protection laws, flight delays due to withheld clearance until the manifest is submitted, summons of station managers, written warnings, States tying tax-invoice generation to the submission of the passenger manifest used as a tool to drive compliance resulting in aircraft operators being penalized for late tax payment when the manifest is not provided, etc.

4. WAY FORWARD

4.1 To enhance the visibility of this Standard and promote greater compliance, it is proposed that Chapter 2 of Annex 9, where passenger manifests are also addressed (Standard 2.11), be explicitly linked to the relevant Standards in Chapter 9. This cross-reference would provide Contracting States with clearer guidance on the relationship between passenger manifests and API data.

4.2 In addition, the ICAO Universal Security Audit Programme Continuous Monitoring Approach (USAP-CMA) does not currently review the compliance of States with Annex 9 Standard 9.15. It is proposed that the compliance protocol includes a question to assess the compliance of States with this Standard, thereby supporting improved global compliance of States.

4.3 States also have an obligation to establish a national Passenger Data Single Window (Standard 9.1 and Recommended Practice 9.1.1) that is define as “A facility that allows parties involved in passenger transport by air to lodge standardized passenger information (that is, API, iAPI and/or PNR) through a single data entry point to fulfil all regulatory requirements relating to the entry and/or exit of passengers that may be imposed by various agencies of the State.” This means that States shall require only one entry point for the respective API and PNR messages. This joint facility for processing passenger data fosters inter-agency collaboration when collecting, processing and analyzing data. By establishing a “targeting center” or Passenger Information Units (PIUs), the need for duplicative passenger manifest submissions to separate national authorities would be eliminated.

4.4 Finally, when a State wishes to introduce updates to the international framework, it must do so through the ICAO Facilitation Panel or the WCO/IATA/ICAO Contact Committee, in conjunction with the WCO’s Data Maintenance Request (DMR) process (**Standard 9.6**). States should avoid imposing unilateral, individual and deviant requirements on aircraft operators.

5. RECOMMENDATIONS

5.1 The Facilitation Panel is invited to:

- take note the information contained in this Working Paper;
- consider the proposed amendment to SARPs as detailed in Appendix A; and
- require ICAO to add the assessment of the compliance of Contracting States with the Annex 9 Standard 9.15 (Annex 9 Amendment 30) to the security-related Standard of Annex 9 protocol questions of the ICAO Universal Security Audit Programme Continuous Monitoring Approach (USAP-CMA).

APPENDIX A

PROPOSED AMENDMENTS

CHAPTER 2. ENTRY AND DEPARTURE OF AIRCRAFT

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B. Documents – requirements and use

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2.11 Contracting States shall not normally require the presentation of a Passenger Manifest. On those occasions when a Passenger Manifest is required the information requirements shall be limited to the elements indicated in Appendix 2. The information shall be accepted in either electronic or paper form.

Note. - Attention is drawn to the Standard 9.15 which prevents requiring passenger manifests in paper form or any non-standard electronic format when an API system is implemented. Establishing an API system is mandatory for Contracting States in accordance with Standard 9.7.

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APPENDIX B

**NEW SARP PROPOSAL: AMENDMENT 30, ANNEX 9, CHAPTER 2,
 STANDARD 2.11**

IMPACT ASSESSMENT

1. What is the problem that this proposal is designed to address?

Please include specific details

With more States implementing passenger data programs (API/PNR) to meet their international obligations, there has been a noticeable rise in requests on aircraft operators that deviate from the established international framework. Such deviations generate unnecessary operational, IT and administrative costs for airlines, delay the implementation of passenger data programs and hinder global initiatives aiming at digitalizing the passenger journey.

While ICAO Annex 9 – Facilitation Standard 9.15 is unequivocal in requiring States not to require passenger manifests when an API system is implemented, the framework provided by Annex 9 needs to be strengthened given that many dozens of States continue to require a passenger manifest despite collecting API data from aircraft operators. Standard 2.11 that as well discuss passenger manifest is not linked back to the obligations contained in Standard 9.15, possibly creating a gap in the understanding of authorities in the linkages between passenger manifests and API data.

To stress the requirement for compliance, it is proposed that the Standard 9.15 be added to the assessment of the compliance of Contracting States with the Annex 9 Standard 9.15 (Annex 9 Amendment 30) to the security-related Standard of Annex 9 protocol questions of the ICAO Universal Security Audit Programme Continuous Monitoring Approach (USAP-CMA).

2. What alternatives to SARPs were considered to solve the problem?

None	Circular	Manual	Policy	<i>Other (please explain)</i>
X				

3a. What is the impact of this proposal on a State?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Implementing this proposal will enhance civil aviation safety			X		
<i>Rationale:</i>					
Implementing this proposal will increase air navigation capacity and improve efficiency			X		
<i>Rationale:</i>					
Implementing this proposal will enhance global civil aviation security and facilitation (taking into account impact on human rights, health and privacy, if any)	X				
<i>Rationale:</i> Compliance with Annex 9 Standards preserves the integrity of a harmonized global system. Compliance with Standard 9.15 is already an obligation by States. The proposal only reinforces the compliance with this Standard and the mutually					

exclusive nature of passenger manifest and API data. Usage of API data increases data quality and automation of processes for States.

Implementing this proposal will foster the development of a sound and economically-viable civil aviation system	x				
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Rationale:
It supports economic resilience and connectivity, since aviation is a catalyst for tourism, trade, and investment. When States comply with Annex 9, airlines are more willing to operate routes and travel becomes more attractive and competitive. Non-compliance can discourage carriers, increase costs, and reduce connectivity — especially for smaller or developing States. Processing the data contained in a passenger manifest is much more cumbersome for States than processing API data, that is electronically transmitted and contains richer information.

Implementing this proposal will minimize the adverse environmental effects of civil aviation activities			x		
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Rationale:

3b. Do the benefits of this proposal justify the cost of its implementation?

Yes	No	Not sure	Not applicable
			x

4a. What is the impact of this proposal on **Industry**?

	<i>Strongly Agree</i>	<i>Agree</i>	<i>Neutral</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Implementing this proposal will enhance civil aviation safety			x		

Rationale:

Implementing this proposal will increase air navigation capacity and improve efficiency			x		
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Rationale:

Implementing this proposal will enhance global civil aviation security and facilitation (taking into account impact on human rights, health and privacy, if any)	x				
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Rationale:
International alignment enhances global interoperability, enhance predictability, reduces friction and streamline airline IT systems that are operating among multiple jurisdictions. The request of passenger manifest may place carriers in breach with personal data protection laws.

Implementing this proposal will foster the development of a sound and economically-viable civil aviation system	x				
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Rationale:
Airlines already invest for setting up, maintaining their API systems and cover the costs for transmission of such data. Requiring a passenger manifest in paper or any other form is simply a duplicative process and impose additional costs.

As with other non-standard requirements, these practices lead to lengthy and resource-intensive exchanges between airlines and authorities when airlines attempt to discourage such deviations. When airlines do not provide a passenger manifest despite having transmitted API data, they may face threats of operational fines, potential exposure to penalties under data protection laws, flight delays due to withheld clearance until the manifest is submitted, summons of station managers, written warnings, etc.

Implementing this proposal will minimize the adverse environmental effects of civil aviation activities			X		
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Rationale:

4b. Do the benefits of this proposal justify the cost of its implementation?

Yes	No	Not sure	Not applicable
X			

5. How long would it take for States and Industry to implement this proposal?

Already implemented	0-1 years	1-2 years	2-5 years	5-10 years	More than 10 years
X					

The proposed changes to the SARPs serve to clarify the legitimacy of already existing practices rather than affect change.

IMPLEMENTATION TASK LIST AND OUTLINE OF GUIDANCE MATERIAL

1. **IMPLEMENTATION TASK LIST**

1.1 **Essential steps to be followed by a State in order to implement proposed amendments¹**

[SARP/TOPIC]

1.1.1 For States that do require a passenger manifest in addition to their API system, the essential steps are the following:

- a) Acknowledge the requirements for not requiring the passenger manifest set forth in Annex 9 – facilitation;
- b) Review the laws and regulations conceived for the collection of passenger manifests;
- c) Set up a PIU

Legislation, regulations, policies, procedures, training, implementation, modification, supervision, assessment, compliance, gap analysis, consideration,

¹ Amendment of a format or clarification nature are not allowed in this Appendix.

2. STANDARDIZATION PROCESS

- 2.1 Effective date: [Month/Year]: to be completed by Secretariat
- 2.2 Applicability date: [Month/Year]: to be completed by Secretariat

3. SUPPORTING DOCUMENTATION:

- 3.1 ICAO documentation:

Title	Type	Publication date
ICAO Facilitation Manual	Doc 9957	2023
WCO/IATA/ICAO API Guidelines	Guidelines	2022

- 3.2 External documentation:

Title	External Organization	Publication date
IATA API - PNR Toolkit	Policy and technical reference material	https://www.iata.org/en/publications/api-pnr-toolkit/#tab-2

4. IMPLEMENTATION ASSISTANCE TASKS

Type	Global	Regional
[Seminar/Symposium/Workshop/etc.]		

5. UNIVERSAL SECURITY AUDIT PROGRAMME (USAP) OR UNIVERSAL SAFETY OVERSIGHT PROGRAMME (USOAP)

- 5.1 An additional protocol questions required under USAP [USOAP] for assessing the Standard 9.15.