



FACILITATION PANEL (FALP)

FOURTEENTH MEETING

Montréal, 20 to 24 April 2026

Agenda Item 3: Amendments to Annex 9 — Facilitation

COOPERATION BETWEEN STATES AND INDUSTRY TO ADDRESS THE ISSUE OF INADMISSIBLE PASSENGERS IN SUPPORT OF STANDARDS & RECOMMENDED PRACTICES IN ANNEX 9

(Presented by the International Air Transport Association (IATA))

SUMMARY

Airlines are experiencing a growing number of inadmissible passengers (INADs). An initial IATA survey of 49 airlines recorded approximately 111,800 INAD cases in 2024, exhibiting significant variation across regions and carrier sizes. This increase results in administrative, operational, safety, and financial burdens on both state regulators and air carriers. Concurrently, many States often fail to fulfil their obligations under Annex 9 — *Facilitation*, thereby imposing excessive responsibilities on airlines on one hand and complicating the safe and efficient management and removal of INADs on the other. This paper outlines the challenges and proposes actions to enhance cooperation, ensure adherence to existing ICAO Standards and Recommended Practices (SARPs), and digitalise the admissibility process to reduce INAD rates and related burdens.

Action by the FAL Panel: The Panel is invited to review the challenges outlined, support greater State compliance with Annex 9 SARPs relating to inadmissible passengers, and consider the proposed recommendations for ICAO to:

- a) urge Member States to fully comply with relevant Annex 9 SARPs governing inadmissible persons, particularly Standards 3.44–3.48 and 5.1-5.16, which define State responsibilities for acceptance and return processes, notification to aircraft operators, cooperation, escort provision, the treatment and care of inadmissible passengers, and the proportionate and transparent application of liability measures to enable timely and coordinated removals;
- b) invite States and Industries to improve data-sharing mechanisms for the benefit of the states and the business;
- c) encourage Member States to develop and implement pre-travel verification tools and single government portals for admissibility; and
- d) develop updated guidance material on the cooperative handling of INADs, including inter-airline removals.

1. INTRODUCTION

1.1 Inadmissible passengers (INADs) are travellers who are denied entry to a State upon arrival or during transit due to non-fulfilment of entry requirements, visa mandates, documentation problems, or other immigration or security criteria requirements.

1.2 The number of INADs refused entry at international borders has risen sharply since the COVID-19 pandemic. At the same time, the geopolitical environment—characterised by conflict, instability, complex migration flows, and fluctuating entry requirements—has made border management more unpredictable.

1.3 With the aim of identifying the causes and the numbers associated with an increase in INAD cases, IATA has launched a survey with airlines and States.

1.4 Airlines reported more than 111,800 incident reports from some 50 operators and over 32,100 reports from 17 jurisdictions globally, with wide dispersion by region and carrier size.

1.5 Costs per case were reported up to USD 14,000 (Europe), with State-imposed penalties and fees identified amongst key cost drivers. Escort-related costs were reported at up to USD 4,000 per case, while an average annual global spend of USD 1.1 million was identified per airline.

1.6 The survey was not able to capture comparable cost data from border control authorities, as INAD-related expenditures are not systematically recorded or reported across the majority of the surveyed jurisdictions.

1.7 53% of airlines reported an increase in INADs from 2023 to 2024; among the authorities that saw growth, the average increase was 41%.

1.8 Common reasons for inadmissibility reported in the survey include fraudulent or invalid documents, absent or expired visas, and other entry-compliance issues. Both airlines and States have lamented that “false credentials,” “undocumented travel,” and “invalid/expired documents” are among the most frequent causes of inadmissibility. Respondents also referenced significant numbers of inadmissibility cases linked to watchlisting, intelligence-led determinations, post-arrival immigration and security risk assessments. In many cases, authorities did not disclose the reasons to airlines, rendering it impossible to target prevention and implement corrective measures.

1.9 Airlines and State Authorities concurred that addressing these challenges requires improved intergovernmental coordination, greater adherence to ICAO SARPs, and interoperable (digital) tools for verifying admissibility before passengers’ travel.

1.10 Airlines have reported that, while they are accountable for specific obligations related to INADs, they increasingly encounter burdens exceeding the scope of Annex 9. States frequently impose additional responsibilities, dictate the place of removal, delay removals or expedite them beyond airlines’ capabilities, or fail to provide adequate support or guidance.

1.11 Airlines and State Regulators concurred that addressing the issue of inadmissible passengers necessitates a comprehensive strategy that includes strengthening international collaboration between States and the aviation industry and improving the prevention and management of such cases.

2. CHALLENGES IDENTIFIED BY THE AIRLINES IN THE IATA SURVEY

2.1 During the survey, airlines reported that while each INAD case is unique, their management consistently presents significant challenges. Key difficulties include:

2.1.1 Financial Liability — Airlines are generally responsible for the full cost of returning inadmissible passengers to their point of origin or another admissible point, when these costs cannot be recovered from passengers. This typically occurs even when the passenger does not hold a return ticket or when the removal requires purchasing a ticket with a different carrier. In addition, airlines face considerable fines and penalties imposed by immigration authorities for cases considered outside the airline's control, although their application and amounts vary across jurisdictions. Other associated costs include custody, meals, and accommodation during delays; escort services (often costly and logistically complex due to external arrangements); removal flights or re-routing; administrative and legal costs; and difficulties recovering expenses from the individuals concerned. These obligations often arise even when the cause of inadmissibility is outside the airline's control and is determined through post-arrival border assessments.

2.1.2 Reputational Risks — A high number of INAD cases—especially when amplified through social media—can damage an airline's reputation. Destinations associated with frequent inadmissibility issues may appear risky or unwelcoming, potentially discouraging customers and affecting route attractiveness, thus damaging both the airline and the destination.

2.1.3 Administrative Obligation — Managing INAD cases requires intensive coordination among multiple parties. Challenges include cases involving multiple carriers for removal; State authorities failing to cooperate or disregarding ICAO Annex 9 – Facilitation Standards; unclear or inconsistent communication regarding the reasons for inadmissibility; and lack of proportional cost-sharing arrangements across carriers and authorities.

2.1.4 Operational Complexity — Suitable return routes may not be immediately available, leading to prolonged stays and higher costs; passengers may no longer be admissible to their original point of departure, requiring identification of alternative removal destinations; and border authorities may impose instructions that disregard airline operational limitations or apply procedures that conflict with, or fall short of, relevant international Standards.

2.1.5 Flight and Airport Disruptions — INAD management often requires reallocation of staff, additional documentation processes, and coordination with airport authorities, leading to flight delays, missed connections, and increased workload for frontline staff.

2.1.6 Passenger Dissatisfaction — INAD cases can negatively affect the overall customer experience for both the individuals involved and other travellers, reducing loyalty and confidence.

3. DISCUSSION

3.1 As per ICAO Annex 9¹ – Facilitation, airlines must return the passenger to a point where they are admissible; ensure safety and well-being until departure; and coordinate with authorities on

¹ 1.1 In accordance with ICAO Annex 9, Standards 3.44–3.48, States are required to accept the return of inadmissible persons without delay, promptly notify airlines of inadmissibility decisions, cooperate in arranging removals, and ensure that law-enforcement escorts and custodial responsibilities remain State functions. Airlines should not be assigned duties beyond those defined in Annex 9, including detention or enforcement tasks, which fall strictly under State authority.”

removal. Effective INAD handling requires States to respect Annex 9 SARPs, ensure timely cooperation with carriers, and apply internationally harmonised procedures.

3.2 Despite the obligations established under Annex 9 (Standards 3.44, 3.45, 3.47, 3.48, and Standards 5.4, 5.9.1, 5.14), survey feedback and operational experience indicate that several States impose additional, non-compliant responsibilities on air carriers, including extended custody, provision of escorts, application of fines for cases beyond the expertise of airlines, penalising airlines when removals are considered to have occurred outside expected timelines, placing operational pressure to expedite removals, or absorbing removal-related costs that Annex 9 assigns to the State. Non-adherence to Annex 9 exacerbates operational disruption, increases financial burdens, and often delays coordination for removal.

3.3 In 2025, the Doha Declaration² tasked ICAO and States to strengthen mechanisms for establishing robust partnerships with immigration and border control agencies, customs, public health authorities and all stakeholders involved in the management of border crossing to foster a unified and comprehensive approach to air transport facilitation.

3.4 The Declaration also tasked ICAO and States to take measures and or actions to address air transport Facilitation issues related to inadmissible persons by partnering with national and international human rights institutions.

3.5 As pre-travel verification models mature, there is an opportunity to extend the functionalities of these digital platforms. Establishing a single travel platform that meets immigration, security, and customs requirements will improve passenger compliance with all entry requirements and reduce airlines' risk of carrying inadmissible passengers. In such settings, an airline's role would focus on informing its customers of the requirement to provide their information and credentials to governments in advance of travel and checking that travellers possess a digital approval to travel.

4. RECOMMENDATIONS

The Panel is invited to review the challenges outlined, support greater State compliance with Annex 9 SARPs relating to inadmissible passengers, and consider the proposed recommendations for ICAO to:

- a) urge Member States to fully comply with relevant Annex 9 SARPs governing inadmissible persons, particularly Standards 3.44–3.48 and 5.1–5.16, which define State responsibilities for acceptance and return processes, notification to aircraft operators, cooperation, escort provision, the treatment and care of inadmissible passengers, and the proportionate and transparent application of liability measures to enable timely and coordinated removals
- b) invite States and Industries to improve data-sharing mechanisms for the benefit of the states and the business
- c) encourage Member States to develop and implement pre-travel verification tools and single government portals for admissibility.
- d) develop updated guidance material on the cooperative handling of INADs, including inter-airline removals.

— END —

² <https://www.icao.int/sites/default/files/Meetings/FALC2025/Declaration/2501055En.pdf>