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ADDITIONAL GUIDANCE ON THE DETERMINATION OF HIGH-RISK CARGO AND MAIL

(Presented by Bangladesh)

EXECUTIVE SUMMARY

This paper provides information on the need for additional ICAO guidance concerning the determination and classification of High-Risk Cargo and Mail (HRCM). The existing provisions in Annex 17 and associated guidance materials such as Doc 8973 establish general requirements. **However, some States, particularly developing ones, face challenges when outbound cargo is designated as high-risk by other States based on specific intelligence or risk categorization of the origin State.**

Such designations often result in increased costs, operational delays, and economic impacts on the affected States' air cargo sector. This paper highlights the importance of additional ICAO guidance to support a consistent, evidence-based, and risk-informed approach for identifying high-risk cargo and mail, particularly when cargo originates in other States.

<i>Strategic Goals:</i>	This information paper relates to the Strategic Objective: Security and Facilitation.
<i>Financial implications:</i>	Not Applicable.
<i>References:</i>	Annex 17 — <i>Security</i> Doc 8973 — <i>Aviation Security Manual</i>

1. INTRODUCTION

1.1 Amendment 13 to Annex 17 introduced the formal classification of high-risk cargo and mail (HRCM), requiring States to apply enhanced security measures to such consignments. A consignment is deemed high risk if it poses a threat to civil aviation due to specific intelligence, or if it shows anomalies or signs of tampering that give rise to suspicion. Regardless of whether the cargo originates from a known or unknown consignor, intelligence-based risk assessments by receiving States may trigger the application of HRCM protocols.

2. DISCUSSION

2.1 **Current ICAO Framework on HRCM:** Annex 17 Standard 4.6.4 requires States to apply enhanced security measures to HRCM. Doc 8973 provides general guidance and examples of enhanced screening methods such as Explosives Detection Systems (EDS), Explosives Trace Detection (ETD), and detection dogs. However, the current guidance does not provide sufficient detail on determining HRCM status, particularly for cargo originating in other States. This has led to inconsistencies in implementation.

2.2 **Practical Challenges for Sending States:** Some States encounter significant challenges when outbound cargo is designated high-risk by receiving States:

2.2.1 **Economic Burden:** Advanced screening technologies such as EDS, ETD, or EDD create substantial financial costs, particularly for developing States.

2.2.2 **Operational Constraints:** Limited availability, certification, and maintenance of screening equipment and detection dogs can cause shipment delays or disruptions.

2.2.3 **Trade Impacts:** Export-oriented economies face reduced competitiveness due to delays and higher costs, particularly affecting time-sensitive goods such as perishables, textiles, and pharmaceuticals.

2.3 **Need for Enhanced ICAO Guidance:** There is a clear need for ICAO to provide more detailed guidance on:

2.3.1 Structured, evidence-based risk assessments for determining HRCM status, especially for consignments originating in other States.

2.3.2 Continuous risk monitoring and reassessment of cargo streams.

2.3.3 Information-sharing protocols that support intelligence-based decision-making while ensuring facilitation and trade efficiency.

2.3.4 Without additional guidance, the inconsistent application of HRCM measures may create disproportionate burdens for certain States and pose challenges to global supply chains.

3. **CONCLUSION**

3.1 The classification of high-risk cargo and mail (HRCM) presents ongoing challenges for several Member States, particularly developing ones. Inconsistent risk assessments, economic burdens, and operational difficulties hinder effective and balanced implementation.

3.2 Additional ICAO guidance would help States adopt a more consistent, evidence-based, and risk-informed approach to HRCM designation and management. Such guidance could promote harmonization, strengthen aviation security, and reduce unnecessary impacts on international trade and supply chains, while balancing security with facilitation.

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