



Aviation Facilitation and Security Priorities for Enhancing the Passenger Journey at Airports in India

The International Air Transport Association (IATA) is the trade association for the world's airlines, representing 290 airlines and 82% of total global air traffic. Our members include Air India, Jet Airways and Vistara as well as many other scheduled airlines that operate services in India. We support many areas of aviation activity and help formulate industry policy on critical aviation issues.

Background

IATA forecasts global passenger numbers will double in 20 years and India is even looking at trebling of passenger numbers by 2037 when some 500 million people are expected to fly to, from or within India. And India has vision to be prepared to accommodate a billion passengers by 2040. In response to this growth in demand, improving processes should be considered a primary solution as infrastructure capacity expansion cannot keep up with the speed of traffic growth. However, in most of Indian airports, a number of processes remain manual and are not so efficient, e.g. requiring stamping on boarding pass at multiple touchpoints. When it comes to security, while today's aviation security measures work, it is an archaic one-size-fits-all platform that comes at great cost to airlines, airports, authorities and passengers. Imposing new and/or additional measures, or simply replacing screening equipment, are not robust enough to ensure security and facilitation effectiveness and will not be adequate to cater to the increased number of travellers in the coming years.

This paper highlights Aviation Facilitation and Security priorities for India and invites the Bureau of Civil Aviation Security (BCAS), the Bureau of Immigration (BOI) and Central Board of Indirect Taxes & Customs (hereinafter Customs) to support improved facilitation and security by adhering to global standards and best practices and by embracing new technologies and innovation in processes to handle this growth and meet passenger experience expectations.



Facilitation and Security Priorities

The following summarizes key priorities and IATA's recommended actions for the respective authorities:

Priorities and Actions		Government authorities
1.	Do away with stamping procedures at touch points and allow Mobile Boarding Pass (MBP) <ul style="list-style-type: none"> Remove stamping at security and immigration 	BCAS, BOI
2.	Support off-airport self-tagging options, such as Home Printed Bag Tag (HPBT) and Electronic Bag Tag (EBT) <ul style="list-style-type: none"> Support HPBT and EBT 	BCAS
3.	Adopt automation in border control process, for both departure and arrival <ul style="list-style-type: none"> Take a phased approach, starting with using national ID or pre-enrolment Allow for future e-Passport rollout for greater capabilities and advantages 	BOI
4.	Adhere to global standards for Advance Passenger Information (API) transmission <ul style="list-style-type: none"> Adopt UN/EDIFACT PAXLST for API 	BOI
5.	Adopt risk-based outcome-focused approach to aviation security	BCAS
6.	Relocate hand luggage screening (for International Arrivals) and adopt risk-based approach instead of 100% screening <ul style="list-style-type: none"> Utilize API information and other data sources in combination with new technology, e.g. biometric, to detect and identify suspicious persons in advance 	Customs, BOI



1. Doing away with stamping procedures at touch points and allowing MBP

IATA understands stamping on boarding pass is required at security and immigration for different purposes. This stamping procedure prevents passengers from using Mobile Boarding Pass (MBP), eliminating the mobile check-in option. According to IATA's 2018 Global Passenger Survey¹, mobile check-in is considered the most preferred means of checking in by passengers. However, this option is not available to passengers flying from India today and they cannot enjoy the same convenience as they could in other airports in the world.

IATA expects this stamping procedure to be gradually removed once the Digi Yatra process is implemented in airports across India. IATA fully supports the Ministry of Civil Aviation (MOCA)'s Digi Yatra initiative and has been working with Bengaluru International Airport Limited (BIAL) from an early stage on many of the concepts and processes and in line with the Digi Yatra vision. The Digi Yatra process is fully aligned with IATA's One ID concept², a prime aviation industry initiative which IATA is leading, and which enables a biometric single token process supported by integrated identity management throughout the passenger journey.

With this future trend in mind, IATA strongly urges BCAS and BOI to remove the stamping procedures and allow MBP to be processed. IATA will be happy to provide assistance in MBP implementation if needed.

2. Regulatory support for off-airport self-tagging options, such as Home Printed Bag Tag (HPBT) and Electronic Bag Tag (EBT)

Hold baggage self-tagging and self-drop is a common self-service solution for many airlines and airports in the world today. Among the variety of self-tagging options, IATA would like to seek BCAS' regulatory support for HPBT and EBT. These two options will help to move part of the passenger processes off airport by enabling passengers to tag their own hold baggage before arriving at the airport. IATA has developed EBT standards and implementation guides for airlines; a number of airlines have since implemented, or are exploring, EBT. IATA believes EBT will be the future in bag tags and has been engaging governments for their support to ensure a favourable regulatory environment for airlines to deploy EBT. Global regulatory approval status can be found in IATA's Fast Travel map³.

The deployment of HPBT and EBT offer passengers a seamless bag check-in process; and not only do they allow airlines to fulfil existing national civil aviation security requirements, such as passenger-baggage reconciliation, airlines and airports also observe efficiency improvements in their processes as well as cost savings in provision of tagging facilities. As such, IATA strongly encourages BCAS to explicitly support HPBT and EBT.

¹ IATA Global Passenger Survey 2018 Highlights: <https://www.iata.org/publications/store/Documents/GPS-2018%20Highlights.pdf>

² IATA One ID concept paper: <https://www.iata.org/whatwedo/passenger/Documents/OneID-concept-paper.pdf>

³ IATA Fast Travel Map: <https://www.iata.org/whatwedo/passenger/fast-travel/Pages/maps.aspx>



3. Adopting automation in border control process, for both departure and arrival

Automated Border Control (ABC) is recommended for improved aviation facilitation in accordance to ICAO Annex 9⁴. Back in 2012, IATA saw the need to proactively promote ABC solutions to expedite border crossing in response to rapid passenger growth. IATA has engaged Immigration authorities in the world and jointly developed the ABC Implementation guide with industry partners⁵. As a result, ABC adoption has increased significantly over the years. Today, more States are opening ABC, without the need to pre-register, to more nationalities. The global ABC implementation status can be found on IATA's website⁶.

IATA understands there is no ABC yet in India but expects it to be implemented in line with Digi Yatra initiative. Given its current focus on domestic flights, and the longer time needed for roll-out on international flights, IATA urges BOI to explore more immediate ABC implementation options, rather than in tandem with the launch of the Digi Yatra process. BOI may consider taking a phased approach, starting for instance with utilization of its national ID cards as biometric token or requiring passengers to pre-enrol, and enabling ABC for only Indian citizens in its initial phase. IATA would like to further encourage BOI to be ready to cater to future ePassport rollout, which will accelerate wider adoption of ABC and facilitate the Digi Yatra process by enabling biometric identification of passengers.

4. Alignment with global standards and best practices for Passenger Data Programs

Adoption of passenger data programs is accelerating. In order to ensure efficient, accurate and secure data transmission, industry has built on standards around the implementation of passenger data programs over the past decades. ICAO Annex 9 Chapter 9, containing enhanced provisions related to passenger data exchange systems, requires States to follow internationally recognized standards for Advance Passenger Information (API)⁷ and Passenger Name Record (PNR)⁸. Most States implementing API and PNR programs follow these standards; and most airlines have the capability of transmitting UN/EDIFACT PAXLST and PNRGOV messages.

Currently in India, Excel CSV files is the only accepted format for API. This causes poor data quality due to errors made during the conversion process. Moreover, converting files adds significant administrative and financial burden on airlines. To be aligned with global standards, IATA requests BOI to immediately work on building the capability to accept UN/EDIFACT PAXLST messages.

IATA also understands that recently there have been discussions among government agencies on introducing a PNR program. IATA applauds the State's collaborative approach in engaging all relevant authorities and involving IATA from the beginning. IATA would like to take this opportunity to remind the following principles in PNR implementation:

- Alignment with global standards: ICAO Doc 9944, Guidelines on Passenger Name Record (PNR) Data and PNRGOV message implementation guidance materials published and updated by the WCO and endorsed by ICAO and IATA.

⁴ 3.34.4 **Recommended Practice.**— *Each Contracting State should consider the introduction of Automated Border Control (ABC) systems in order to facilitate and expedite the clearance of persons entering or departing by air.*

⁵ ABC Implementation Guide: <https://www.iata.org/whatwedo/passenger/Documents/ABC-Implementation-Guide-2nd-Edition.pdf>

⁶ ABC Implementation interactive map: <https://www.iata.org/whatwedo/passenger/Pages/automated-border-control-maps.aspx>

⁷ 9.6 The API system of each Contracting State shall be supported by appropriate legal authority (such as, inter alia, legislation, regulation or decree) and be consistent with internationally recognized standards for API.

Note 2.— The UN/EDIFACT PAXLST message is a standard electronic message developed specifically, as a subset of UN/EDIFACT, [...].

⁸ 9.22 Each Contracting State requiring Passenger Name Record (PNR) data shall align its data requirements and its handling of such data with the guidelines contained in ICAO Doc 9944, *Guidelines on Passenger Name Record (PNR) Data*, and in PNRGOV message implementation guidance materials published and updated by the WCO and endorsed by ICAO and IATA.



- No charge on airlines or passengers: Just like API, PNR is also a border security requirement. States should not charge airlines or passengers in a bid to subsidize their own security development costs as suggested in ICAO Doc 9082⁹.
- Cooperation with industry, International Organizations and other States: Industry can share experiences and insights from their past experiences; International Organizations can provide technical and policy support, but also can assist with utilization of global watch lists and database; Cooperation with other States is needed in view of potential data protection issues.
- Efficiency: Passenger data exchange programs are expensive. Thus, only necessary data should be requested; Also, using Single Window, a common data transmission entry point, is strongly recommended as described in ICAO Annex 9¹⁰.

5. Adopting Risk-Based Outcome-Focused Approach to Aviation Security

To sustain traffic growth in a continuously evolving threat environment and to ensure that capabilities and scarce resources are concentrated where the risk is highest, IATA believes in risk-based outcome-focused frameworks, balanced against industry stakeholders and governments' capability, to manage threats.

IATA fully supports aviation security moving away from a one-size-fits-all prescriptive approach to a risk-based, results-driven model and effective implementation of ICAO's Annex 17 Standard and Recommendations (SARPs). In the framework of a risk-based, outcome-focused approach to aviation security, risk assessment of potential concerns and threats should be carried out to develop mitigation actions that the Government of India may implement to achieve risk-based security programmes. Risk assessments are essential to determining mitigating measures aimed at countering the threat to civil aviation. The ICAO Global Risk Context Statement (RCS) provides more details on risk assessment method and a process map.

Additionally, IATA recommends implementation of a Security Management System (SeMS), which is based on proven principles of Annex 19 Safety Management System (SMS) and provides the necessary organizational structure, accountabilities, policies and procedures to ensure effective security oversight. The SeMS Manual provides guidance on implementing efficient, accurate and cost managed controls via a systematic, data-driven reporting and risk assessment approach. The implementation of a SeMS framework will enable States to foster a risk-based, outcome-focused approach to security.

IATA understands that in India there is a 100% pat-down of passengers being performed following the primary screening processes through the Walk-Through Metal Detector (WTMD). While this may be performed to strengthen security screening which IATA fully supports, it is recommended that the pat-down and/or secondary search be performed on a random basis for passengers who do not trigger the WTMD alarm. It is our understanding that airports in India are deploying body scanners from 2019. In view of the above and regardless of the deployment model of the body scanners, either as a primary method or to complement the WTMDs, the principles of randomness and unpredictability should be applied on a number of passengers who do not activate the body scanner or WTMD alarm, whereby they and their carry-on items are subjected to secondary screening including manual search. In doing so, airports are ensuring that randomness and unpredictability are introduced in security measures in accordance with ICAO Annex 17 Recommendation 4.1.2. The proportion of passengers selected for random search should be determined based on threat level and risk assessments carried out and

⁹ 7. iv) Civil aviation should not be charged for any costs that would be incurred for more general security functions performed by States such as general policing, intelligence gathering and national security.

¹⁰ 9.1 **Recommended Practice.**— *Contracting States requiring the exchange of Advance Passenger Information (API), interactive API (iAPI) and/or Passenger Name Record (PNR) data from aircraft operators should create a Passenger Data Single Window facility for each data category that allows parties involved to lodge standardized information with a common data transmission entry point for each category to fulfil all related passenger and crew data requirements for that jurisdiction.*



approved by appropriate authority/government of India. Randomness and unpredictability should also be applied to reinforce the deterrent effect of security measures. Additional details on random and unpredictable screening of passengers is also provided in ICAO Doc 8973 Security Manual and Smart Security's Alternative Methods for Cabin Baggage and Passenger Screening document provide deployment guidance and best practices.

6. Relocating hand luggage screening (for International Arrivals) and adopting risk-based approaches instead of 100% screening

IATA understands that there is 100% hand luggage screening performed right after the arrival border control in some airports in India. This process creates a bottleneck in the overall inbound flow and the situation will worsen with increased traffic.

ICAO Annex 9 requires States to adopt the dual-channel system or other selective process based on risk management^[1]. IATA understands each country has different risk and threat perception, and thus each location has different set-up and procedures. The current screening procedure at select-airports in India as well may have its own purpose, but it can be done differently without compromising passenger facilitation, while still meeting Customs' objectives.

IATA recommends that the checks at such airports, should be relocated to after baggage claim while adopting random screening based on risk management. One of the recommendations is to utilize API information and other data sources in combination with new technology, e.g. biometric, to detect and identify suspicious persons in advance. This will require strong coordination and cooperation between government agencies, including BOI. Through this effective data sharing and utilization, Customs can also perform random screening after baggage claim. Customs can limit its searches to suspicious persons and random screening – this will be a much more targeted approach leading to better outcomes with lesser resource requirements.

^[1] 3.49 Contracting States shall adopt the dual-channel system or other selective process for customs and quarantine inspection based on risk management, as appropriate to the conditions and traffic volumes at the airport concerned.

Note.— See Appendix 6, Recommendation of the Customs Co-operation Council (now the World Customs Organization) for a simplified customs control based on the dual-channel system.