

GUIDANCE FOR KNOWN CONSIGNORS

This guidance will help you to assess your existing security arrangements against the required criteria for known consignors as described in Regulation (EC) No 300/2008 of the European Parliament and of the Council on common rules in the field of civil aviation security and its implementing acts. This should enable you to ensure that you meet the requirements before arranging an official on-site validation visit.

It is important that the validator is able to talk to the right people during the validation visit (e.g. person responsible for security and person responsible for recruitment of staff). An EC checklist will be used to record the validator's assessments. The checklist is not publicly available and is for the validator's use only. Once the validation checklist is completed, the information contained in the checklist will be handled as classified information.

Please note that questions on the EC checklist are of two types: (1) those where a negative response will automatically mean that you cannot be accepted as a known consignor and (2) those which will be used to build up a general picture of your security provisions to allow the validator to reach an overall conclusion. The areas where a 'fail' will automatically be recorded are indicated by the requirements indicated in bold type below. If there is a 'fail' on the requirements indicated in bold type, the reasons will be given to you and advice on adjustments needed to pass.

Introduction

The cargo must be originated by your company on the site to be inspected. This covers manufacture on the site and pick and pack operations where the items are not identifiable as air cargo until they are selected to meet an order. (See also Note.)

You will have to determine where a consignment of cargo/mail becomes identifiable as air cargo/air mail and demonstrate that you have the relevant measures in place to protect it from unauthorised interference or tampering. This will include details concerning the production, packing, storage and/or despatch.

Organisation and responsibilities

You will be required to provide details about your organisation (name, VAT or Chamber of Commerce number or Corporate registration number if applicable), address of site to be validated and main address of organisation (if different from the site to be validated). The date of the previous validation visit and last unique alphanumeric identifier (if applicable) are required, as well as of the nature of the business, the approximate number of employees on site, name and title of person responsible for air cargo/air mail security and contact details.

Staff recruitment procedure

You will be required to provide details of your recruitment procedures for all staff (permanent, temporary or agency staff, drivers) with access to identifiable air cargo/air

mail. The recruitment procedure shall include a pre-employment check or a background check in accordance with point 11.1 of Regulation 185/2010. The on-site validation visit will involve an interview with the person responsible for the recruitment of staff. He/she will need to present evidence (e.g. blank forms) to substantiate the company procedures. This recruitment procedure shall apply to staff recruited after 29 April 2010. .

Staff security training procedure

You will need to demonstrate that all staff (permanent, temporary or agency staff, drivers) with access to air cargo/air mail have received the appropriate training on security awareness matters. This training shall take place in accordance with point 11.2.3.9. of Regulation 185/2010. Individual training records should be kept on file. In addition, you will be required to show that all relevant staff have received training or recurrent training in accordance with chapter 11 of Regulation 185/2010.

Physical security

You will be required to demonstrate how your site is protected (e.g. a physical fence or barrier) and that relevant access control procedures are in place. Where applicable, you will be required to provide details of any possible alarm- and/or CCTV system. It is essential that access to the area where air cargo/air mail is processed or stored, is controlled. All doors, windows and other points of access to air cargo/air mail need to be secure or subject to access control.

Production (where applicable)

You will need to demonstrate that access to the production area is controlled and the production process supervised. If the product can be identified as air cargo/air mail in the course of production then you will have to show that measures are taken to protect air cargo/air mail from unauthorised interference or tampering at this stage.

Packing (where applicable)

You will need to demonstrate that access to the packing area is controlled and the packing process supervised. If the product can be identified as air cargo/air mail in the course of packing then you will have to show that measures are taken to protect air cargo/air mail from unauthorised interference or tampering at this stage.

You will be required to provide details of your packing process and show that all finished goods are checked prior to packing.

You will need to describe the finished outer packing and demonstrate that it is robust. You also have to demonstrate how the finished outer packing is made tamper evident, for example by the use of numbered seals, security tape or special stamps. You also need to show that you hold those under secure conditions when not in use and control their issue.

Storage (where applicable)

You will need to demonstrate that access to the storage area is controlled. If the product can be identified as air cargo/air mail while being stored then you will have to show that measures are taken to protect air cargo/air mail from unauthorised interference or tampering at this stage.

Finally, you will have to demonstrate that finished and packed air cargo/air mail is checked before despatch.

Despatch (where applicable)

You will need to demonstrate that access to the despatch area is controlled. If the product can be identified as air cargo/air mail in the course of despatch then you will have to show that measures are taken to protect air cargo/air mail from unauthorised interference or tampering at this stage.

Transportation

You will have to provide details concerning the method of transportation of cargo/mail to the regulated agent.

If you use your own transport, you will have to demonstrate that your drivers have been trained to the required level. If a contractor is used by your company, you will have to ensure that a) the air cargo/air mail is sealed by you or b) the haulier declaration as contained in Attachment 6-E has been signed by the haulier.

If you are responsible for the transportation of air cargo/air mail, you will have to show that the means of transport are securable, either through the use of seals, if practicable, or any other method. Where numbered seals are used, you will have to demonstrate that access to the seals is controlled and numbers are recorded; if other methods are used you will have to show how cargo/mail is made tamper evident and/or kept secure. In addition you will need to show that there are measures in place to verify the identity of the drivers of vehicles collecting your air cargo/air mail. You will also need to show that you ensure that cargo/mail is secure when it leaves the premises. You will have to demonstrate that air cargo/air mail is protected from unauthorised interference during transportation.

You will not have to provide evidence about driver training or a copy of the haulier declaration where a regulated agent has made the transport arrangements for collecting air cargo/air mail from your premises.

Consignor's responsibilities

You will need to declare that you will accept unannounced inspections by the appropriate authority's inspectors for the purpose of monitoring these standards.

You will also need to declare to provide the Irish Aviation Authority with the relevant details promptly but at least within 10 working days if:

- a) the overall responsibility for security is assigned to anyone other than the person named
- b) there are any other changes to premises or procedures likely to significantly impact on security
- c) your company ceases trading, no longer deals with air cargo/air mail or can no longer meet the requirements of the relevant EC legislation.

Finally, you will need to declare to maintain standards of security until the subsequent on-site validation visit and/or inspection.

You will then be required to accept full responsibility for the declaration and to sign the validation document.

NOTES

Explosive and incendiary devices

Assembled explosive and incendiary devices may be carried in consignments of cargo if the requirements of all safety rules are met in full. Explosive and incendiary devices, whether assembled or not, shall not be carried in consignments of mail.

Consignments from other sources

A known consignor may pass consignments which it has not itself originated to a regulated agent, provided that:

- (a) they are separated from consignments which it has originated; and
- (b) the origin is clearly indicated on the consignment or on accompanying documentation.

All such consignments must be screened before they are loaded on to an aircraft.

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