

CHECKLIST

HOW TO SET UP A PASSENGER DATA EXCHANGE PROGRAM



Public authorities should consider the following steps:

Determine your needs - Is the data necessary? What data is necessary?



What are your objectives behind obtaining passenger data? Batch API, interactive API and PNR data provide different benefits to border management and/or aviation security. Receiving the data also involves the creation of systems that range from simple (standard Batch API) to complex (PNR) and very complex (interactive API). Public authorities should make sure that data requested from airlines forms part of an overall risk assessment / border management program and is

sufficient to meet their needs. The reasons for requiring data should be laid out in official documentation. Please refer to the Toolkit videos on Batch API, Interactive API and PNR for more information on their respective uses and benefits. Finally, authorities should make sure that infrastructure and resources will be in place before embarking on a data exchange program, so that the large amounts of data coming in can be used effectively and efficiently.

Familiarize yourself with global standards



This Toolkit provides high level information summarizing the global standards and guidelines for passenger data exchange, and explains the basics of airlines' IT systems and capabilities. Public authorities are invited to refer to the detailed official international provisions for passenger data exchange, which can be accessed in

the Toolkit's Document Library. The main provisions are contained in ICAO Annex 9 – Facilitation, in the WCO/IATA/ICAO Guidelines on Advance Passenger Information and in the Guidelines on Passenger Name Records (ICAO Document 9944

Include stakeholders early



Public authorities should communicate as soon as possible with various stakeholders on their intentions to set up a passenger data program, even when the details are not yet fully known. While airlines are usually first informed of new programs locally through airport-based Airline Operating Committees (AOCs), it is recommended that public authorities also notify airlines' headquarters by sending an email to IATA at passengerdata@iata.org. You may consider creating a Stakeholder Consultation Group including other agencies / Ministries in your

country that may be interested in utilizing the same passenger data, as well as airlines flying into or out of your country (this includes foreign international airlines). The Stakeholder Consultation Group should be informed of plans and progress towards a passenger data program, and can help develop the detailed technical specifications that meet your needs and fit with airlines' capabilities. IT suppliers and commercial vendors should be involved once requirements have been defined, and constitute important stakeholders in the development of an efficient, sustainable solution.

□ Approach foreign States for any data protection issues

↗ Passenger data may contain personal data concerning passengers that is considered “sensitive” under national law or under the laws of third countries. For instance, meal preferences, credit card information and health issues can be captured as part of the PNR but cannot be shared with third countries according to European Union Directives. Other types of personal data can only

be shared after establishing that it will be adequately protected. Airlines fly across borders and must observe the laws of both the States of departure and destination. Therefore, if these laws conflict, it is important that both States should enter into consultation, as soon as possible, to resolve this conflict of laws.

□ Check that appropriate legislation is in place

↗ Any requirement for the transfer of passenger data should be governed by explicit legal provisions explaining which type of data (API or PNR or both) will be requested, why and by when. The legislation should give public authorities the appropriate legal authority to process the data requested from aircraft operators, in a manner that observes these guidelines. States are invited to forward the full text of such legislation to ICAO for online

dissemination to other States for information. Once legislation is in place, it should be complemented by detailed technical specifications, issued at least 3 to 6 months prior to the passenger data transmission requirement's entry into force as authorized by the legislation to allow both authorities and airlines to program their systems, test connectivity and train staff.

□ Seek assistance from experts

↗ The International Civil Aviation Organization (ICAO), the World Customs Organization (WCO) and the International Air Transport Association (IATA) represent both States and industry, and are the owners of the international Standards and Guidelines on API and PNR. ICAO, WCO and IATA are available to answer your questions and to

provide individualized assistance. Please contact these organizations directly or send an email to passengerdata@iata.org. A number of regional Workshops will also be organized to learn more about the global framework for passenger data and build regional partnerships

□ Cooperate and remain flexible

↗ Cooperation with other national agencies, with foreign States, with industry and with international organizations should be maintained as much as practicable during the preparation (lead-up) phase, as well as during implementation. The Stakeholder Consultation Group should be

engaged whenever necessary. Public authorities should also remain flexible, particularly in the early phases of implementation. Certain technical aspects may reveal problems preventing full compliance by the airlines, in which case they should not be penalized as the issues are being resolved.