POSITION PAPER

Hold Baggage Reconciliation (2025)

Editorial Note: This document contains international guidance that should be disseminated as widely as possible, while following a "need-to-know" approach, to relevant industry stakeholders.

Executive Summary

In June 2025, ICAO released updated guidance on Hold Baggage Screening, Handling, and Processing, specifically clarifying procedures for accompanied versus unaccompanied baggage. This update aligns Annex 17 interpretation with existing standards, enabling risk-based security measures that improve throughput, operational efficiency, and economic sustainability. A public LinkedIn message, then an official ICAO Electronic Bulletin (EB 2025/26) has been released on 28 July and 5 August 2025 respectively.

— **The new guidance allows unaccompanied hold baggage, previously screened to a defined high standard using advanced methodologies, to remain onboard without mandatory offloading, supporting the wider adoption of One-Stop Security (OSS) and Recognition of Equivalence (RoE) agreements, particularly at major hubs equipped with advanced screening technologies.**

— **Appropriate authorities are strongly encouraged to update their national regulations and guidance to align them with the new ICAO material. They should clearly define the appropriate standards for screening for hold baggage (Annex 17 Standards 4.5.2 and 4.5.6) and support aircraft operator-driven proposals based on operational risk assessments.**

— **Aircraft operators are also encouraged to work with national regulators to develop performance-based security protocols, supported by the new international guidance and by operators' own "operational risk assessments" [1].**

This development addresses a long-standing misalignment wherein ICAO's Aviation Security Manual (Doc 8973) and Universal Security Audit Program protocol questions implied automatic offloading was necessary, despite Annex 17's 2011 revision removing this requirement. The outdated interpretation had caused unnecessary re-screening, operational inefficiencies, and hindered international agreements like OSS and RoE.

IATA has played a pivotal role since 2020 in leading industry advocacy through working papers, position statements, and detailed analysis challenging the outdated guidance. This advocacy has been instrumental in aligning ICAO guidance with evolving international standards and technological advancements, supporting ICAO's broader mandate under Article 44 of the Chicago Convention to promote safe, efficient, and economically sustainable international air transport.

[1] ICAO Doc 8973 – Hold Baggage Screening, Handling and Processing (June 2025), paragraph B3.12

Legal and Technical Background

The foundational aims and objectives of ICAO, as outlined in Article 44 of the Chicago Convention, include not only the development of principles and techniques to enhance safety and security, but also the regular, efficient and economically sustainable development of international air transport. These goals can only be effectively advanced through the recognition and proper consideration of industry's proposals in relevant ICAO bodies. This is especially critical when advocating for the continuous updating of ICAO Annex 17 and associated guidance materials to address implementation challenges identified by both operators and regulators.

A clear example on the need for better alignment between Annex 17 and its associated guidance material ensuring internationally harmonized implementation, is the question of Hold Baggage (HB) Reconciliation (HBR).

In many States, national regulations still reference an outdated version of Annex 17 "Standard 4.5.3", introduced in 2006. This standard required commercial air transport operators to not transport the HB of passengers who are not on board the aircraft unless that baggage is identified as unaccompanied and subjected to additional screening. The requirement for "additional" screening created an operational *synchronous* obligation to offload any HB newly identified as unaccompanied for performing additional screening. At the point of origin, this meant re-screening using the same detection technology. At transfer points, it required new screening regardless of existing One-Stop Security (OSS) or Recognition of Equivalence (RoE) arrangements.

Given the deployment of advanced detection technologies at points of origins, the actual benefit of "additional screening" on the level of security is debatable. However, the negative impacts on operational regularity, efficiency and economical sustainability were evident, especially considering the cascading effects caused by upstream delays at different transfer points. Interestingly, similar but *non-synchronous* security requirements already existed in Standard 4.5.5 (now 4.5.6) together with the acceptance for carriage by the airline and the traceability, or operational reconciliation of all HB (accompanied and unaccompanied), dating back to 2006.

Since 2011, Standard 4.5.3 has been revised replacing the term "passengers" by "persons" and more importantly "additional" by "appropriate" screening, meaning that the automatic offloading of unaccompanied HB for performing additional screening was no longer an international requirement under Annex 17.

However, the associated guidance contained in the ICAO Aviation Security Manual (Doc 8973, Restricted) continued to reflect an outdated interpretation with an automatic offloading of HB when its owner failed to board. This misalignment exists with some USAP-CMA Protocol Questions[2] still outdated.

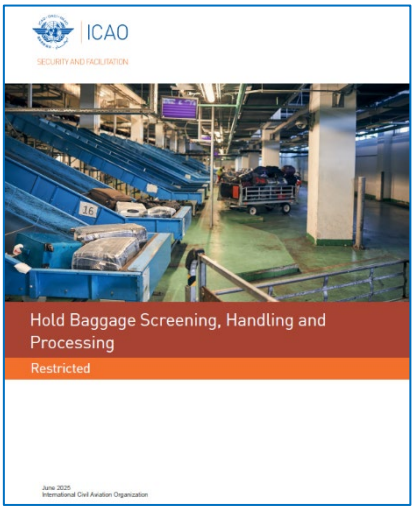
IATA challenged that outdated interpretation which was hindering potential Innovation in Security such as 100% Hold Baggage Screening One-Stop Security Initiative (100% HBS OSS)[2] and requested an urgent update of ICAO guidance via one ICAO AVSEC Panel Working Paper (2023) questioning the need to offload appropriately identified and screened hold baggage[3]. In addition, IATA published public position papers on Hold Baggage (HB) Security Procedures (2024) and Hold Baggage (HB) Security (2025) as well as related content in the IATA Annual Security Report (2023) and IATA Annual Security Report (2024).

— **These advocacy efforts delivered tangible results, culminating in ICAO's publication of new guidance material on *Hold Baggage Screening, Handling and Processing* in June 2025, including a dedicated section on "*Hold Baggage Reconciliation – the accompanied versus unaccompanied process*", accessible by States via ICAO AVSEC Portal. ICAO subsequently issued an official Electronic Bulletin (EB 2025/26) on 5 August 2025 to announce and promote the release of this material.**

[2] USAP-CMA PQ 6.215 (2025) still mentions '*[…] retrieving and offloading baggage […] if a person with baggage does not board […]*'
[3] request access to the SeMS Aviation Community in contacting aviationsecurity@iata.org

New ICAO Hold Baggage Guidance Material (June 2025)

Aircraft and airport operators should contact their respective appropriate authorities to obtain a copy of the new ICAO guidance material, which is made available to States via the ICAO secure portal.



In the meantime, operators could retrieve all technical information in two IATA position papers already available Hold Baggage (HB) Security Procedures (2024) and Hold Baggage (HB) Security (2025) that are totally aligned with the newly developed guidance material reflected in the ICAO Aviation Security Manual (Doc 8973, June 2025). This is worth mentioning the **IATA concept of UNAR** introduced in the PSCRM Edition 40 (2020), currently in the Recommended Practice 1745a) in PSCRM Edition 42 (2022), which allows the secure acceptance of HB in different flight (as for Unaccompanied Baggage - UNAC or RUSH bags) but ahead of its owner board an aircraft.

In addition, IATA launched a 10-year Global Baggage Roadmap to modernize baggage operations, built around three pillars: baggage Information Exchange and Data Standardization, Baggage Tracking and Automation, and Streamlining the baggage claim process, combatting fraud, and enhancing the customer experience. Please visit the IATA Baggage Operations website for more information.

Acceptance Principles for Hold Baggage (2025)

In 2025, the following principles shall apply for all HB engaged in commercial air transport operations:

1. be accepted only from passengers who have checking in for a flight, or from a crew on duty,
2. be accepted by a responsible agent or authorized representative of the aircraft operator,
3. may also be accepted at an automated self-service baggage drop station, in compliance with the national security requirements,
4. only be loaded onto an aircraft when it has been screened at their point of origin using security systems and appropriate standards capable of detecting the presence of explosives and explosive devices with standard of screening defined by authorities,
5. be protected from unauthorized interference from the point of screening (or acceptance into the care of the airline) until departure of the aircraft in security restricted areas,
6. be rescreened if the integrity of the protection is jeopardized,
7. be identified as accompanied or unaccompanied depending on the presence of their owner on board

Unaccompanied Hold Baggage Reconciliation (HBR)

8. When the owner of the HB is not on board the aircraft, States may consider accepting the implementation of the following measures to a newly becoming unaccompanied HB:
    a. require that any HB that becomes unaccompanied should be offloaded. However, exceptions may be made when factors that are clearly beyond the owner's control led to HB becoming unaccompanied, and/or
    b. **permit exceptions where the HB has already been screened to a defined high standard before it became unaccompanied (for example using the most advanced and effective screening methodology)**, and/or
    c. allow virtual rescreening via the review of the original screening image by a screener, considering the additional risk inherent in an HB becoming unaccompanied,

9. **All decisions should be based on an operational risk assessment[1] conducted by the aircraft operator**,
10. When HB is properly (re)identified and screened to the appropriate standard as determined by the authorities, it could be accepted (or not) for carriage by the aircraft operator, and
11. If accepted for carriage, HB must be operationally tracked (on the ground and during the journey) with the ultimate operational objective of reconciling them with their respective owners in the end of the journey.

Operational Risk Assessment for Unaccompanied Hold Baggage

As stated in ICAO Annex 17 Standard 4.5.6 (*2022, same wording since 2006*) which serves as the primary reference in IATA documents, all appropriately screened and identified HB must be accepted for carriage by the air carrier, or aircraft operator.

4.5.6 Each Contracting State shall ensure that commercial air transport operators only transport items of hold baggage which have been individually identified as accompanied or unaccompanied, screened to the appropriate standard and accepted for carriage on that flight by the air carrier. All such baggage should be recorded as meeting these criteria and authorized for carriage on that flight.

Furthermore, as outlined in the latest ICAO guidance material for Hold Baggage (HB) and Hold Baggage Reconciliation (HBR), all decisions related to the security controls applied to HB that becomes newly unaccompanied HB should be based on both the results of national risk assessment conducted by the authorities[4] and operational risk assessment performed by the aircraft operator[4].

To support aircraft operators, and their External Service Providers (ESPs) implementing HB security measures on the aircraft operators' behalf, IATA has developed one example of harmonized checklist covering all steps from the acceptance of the hold baggage to the operational considerations for offloading decisions. These decisions should be based on the operational and/or security risk assessments performed by the aircraft operator and aligned with the national risk assessments issued by the authorities. The proposed checklist is available in the SeMS Aviation Community[2], under the dedicated SeMS Toolkit for ESPs folder. This checklist should be adapted and integrated into operational checklists within Standard Operating Procedures (SOPs) to be followed by the ESPs responsible for performing ground security measures on operators' behalf under outsourcing agreements.

Finally, the definition of outsourcing should be reminded as "*the business practice whereby one party (e.g. an operator or provider) transfers, usually under the terms of a contract or binding agreement, the conduct of an operational function to a second party (e.g. an external service provider). Under outsourcing, the first party retains responsibility for the output or results of the operational function even though it is conducted by the second party*" (IATA Reference Manual, IRM Edition 15, 2026).

In this context, outsourcing security measures to ESPs does not remove the aircraft operator's responsibilities outlined in international, regional and national security requirements.

[4] ICAO Doc 8973 – Hold Baggage Screening, Handling and Processing (June 2025), paragraph B3.9