

Hold Baggage (HB) Reconciliation (2025) Legal Background

The international security provisions applicable to Hold Baggage (HB) are contained in the Chapter 4.5 of ICAO Annex 17. These provisions start with the screening of all originating HB being loaded onto an aircraft engaged in commercial air transport operators (Standard 4.5.1) using appropriate screening methods capable of detection the presence of explosives and explosive devices, and appropriate standards of screening as defined by the appropriate authorities (Standard 4.5.2). All HB shall be protected from unauthorized interference from the point of screening (or acceptance into the care of the airline) until departure of the aircraft (Standard 4.5.3).

In addition, all HB of passengers (or other persons such as crew members) must be individually identified as accompanied or unaccompanied, screened to the appropriate standard before being accepted for carriage on the flight by the airline. Airlines must not transport the HB of a person who is not on board the aircraft unless that HB has been properly identified as unaccompanied and screened to the appropriate standard. (Standards 4.5.4 and 4.5.6).

Finally, all transfer HB shall also be screened prior to being loaded onto an aircraft and protected from unauthorized interference, unless Recognition of Equivalence collaborative arrangements (also known as One Stop Security) are established (Standard 4.5.5).

Current Standard 4.5.4 (Annex 17, 2022) is the heritage of the former Standard 5.1.4 introduced in Annex 17, back in 1986, as a response to the sabotage of Air India 182 (23 June 1985). This standard has been modified and renumbered in 1989, 2002 and 2006, with Amendment 11 to Annex 17 introducing the predecessor of Standard 4.5.6, as well as the 100% screening all originating HB with Standard 4.5.1.

In 2006, Standard 4.5.4 (at that time 4.5.3) requested that commercial air transport operators do 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 established an operational "synchronic" need for offloading any HB newly identified as unaccompanied for performing additional screening. The very same, but "non-synchronic" security requirements were present in Standard 4.5.5 together with the acceptance for carriage by the airline and the traceability, or operational reconciliation of all HB (accompanied and unaccompanied) in the last sentence of the very same Standard 4.5.5 (now 4.5.6).

In 2011, and Amendment 12 to Annex 17, Standard 4.5.3 has been adjusted with "passengers" changed by "persons" and "additional" by "appropriate" screening. These adjustments were intended to cover a potential vulnerability liked to the placement of an IED by a crew member.

Unfortunately, the proposed wording for new 4.5.3 (2011) remained too vague with "baggage of persons" and "appropriate screening" that are both already present in Standard 4.5.5 (since 2006) with "hold baggage" and "screened to the appropriate standard". The differences, nuances or change of purpose between the requirements in new 4.5.3 and existing 4.5.5 are difficult to identify for anyone not privileged to access to AVSEC Panel Working Papers, meaning almost all aviation stakeholders.

Since 2020, and Amendment 17 to Annex 17 requesting all staff (including crew members) to be screened when entering into the Security Restricted Areas (Standard 4.2.6 at that time, 2.4.5 in 2022), the specific vulnerability on crew member could be considered as mitigated. Consequently, the overlap and duplication between Standards 4.5.4 and 4.5.6 has been recognized by ICAO AVSEC Panel since 2020.



General Objectives for HB Security Procedures

Regardless the potential merging of Annex 17 Standards 4.5.4 and 4.5.6, these two standards are duplicative with Standard 4.5.4 mainly focusing on no-shows (and is emotionally charged as initially linked to a sabotage), while Standard 4.5.6, unchanged since its inception in 2006, is more holistic and covers all the security operational constraints linked to the transport of all items of hold baggage in commercial air transport operations. **ICAO Annex 17 Standard 4.5.6 (2022) is the main reference in IATA reference documents.**

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.

Acceptance principles for HB

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

- 1. HB should be accepted only from passengers who have checking in for a flight, or from a crew on duty,
- 2. HB should be accepted by a responsible agent or authorized representative of the aircraft operator, who should verify the identity of the person checking the HB. Along with a valid boarding pass (or crew ID),
- 3. HB must 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,
- 4. HB must 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,
- 5. HB must be rescreened if the integrity of the protection is jeopardized,
- 6. HB must be identified as accompanied or unaccompanied depending on the presence of their owner on board,
- 7. When the owner of the HB is not on board the aircraft, States may adopt different approaches when applying specific security control to newly becoming unaccompanied HB:
 - some States 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 the HB becoming unaccompanied,
 - b. Some States may 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,
 - c. Other States may allow virtual rescreening via the review of the original screening image by a screener, considering the additional risk inherent in an HB becoming unaccompanied,
- 8. All decisions should be based on an operational risk assessment conducted by the aircraft operator,
- 9. 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
- 10. 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.

All the above principles are aligned with the newly developed guidance material reflected in the ICAO Aviation Security Manual (Doc 8973, 2025) and the current IATA guidance as summarized in the position paper <u>Hold Baggage (HB) Security Procedures</u>.

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.