



Challenges of Non-Adherence to Passenger Data Standards

*This guidance material has been developed by the **IATA Control Authorities Working Group (CAWG)**. It is the outcome of collaborative working arrangements between governments and the airline industry to find mutually acceptable solutions for border management. For more information on the [IATA CAWG](#).*

Summary

This document highlights the data quality and compliance challenges for airlines when States deviate from passenger data's global regulatory framework and require non-standard elements to be included in operators' Advance Passenger Information (API) and/or Passenger Name Record (PNR) data.

With this document, the CAWG intends to raise awareness of the global framework pertaining to passenger data as States that require airlines to provide non-standard data may not be aware of the global standards or unfamiliar with how airlines' business processes and data systems work. It seeks to increase adherence by States with inter-governmental standards and internationally agreed best practices for the collection, storage, formatting and transmission of API, interactive API (iAPI) and PNR data. It finally intends to raise awareness of the existing formal process for consideration of the addition of new data elements to existing standards before requiring such information from airlines.

Its content is based on a Working Paper presented by The Netherlands and the United Kingdom on behalf of the CAWG to the Eleventh Meeting of the International Civil Aviation Organization (ICAO) Facilitation Panel (FALP). It led to the endorsement, by the FALP experts, of a new Standard and the modification to an existing Standard in Annex 9 – *Facilitation*, as per the following:

9.5 Contracting States shall not require airlines to provide non-standard data elements as part of API, iAPI and/or PNR provisions.

9.6 Contracting States shall, when considering requiring elements that deviate from the standard, submit a request to the WCO/IATA/ICAO Contact Committee in conjunction with the WCO's Data Maintenance Request (DMR) process via a review and endorsement process for inclusion of the data element in the guidelines.

1. International Framework

1.1 Airlines provide API, iAPI and PNR data to governments in compliance with legislative and regulatory requirements of border security, law enforcement, immigration and/or customs agencies based on existing international standards.

- 1.2 The global standards (PAXLST and PNRGOV) have been developed and agreed jointly by States and airlines within the frameworks of the World Customs Organization (WCO), IATA and ICAO.
- 1.3 In regard to API, the ICAO Annex 9 mandates States to “require only data elements that are available in machine readable form in travel documents” and that the information States require “shall conform to specifications for UN/DIFACT PAXLST messages found in WCO/IATA/ICAO API Guidelines” (Standard 9.10).
- 1.4 In regard to PNR, as per ICAO Annex 9, each State shall “align its PNR 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” (Standard 8.24 b).
- 1.5 Airlines’ systems have been developed to communicate and transfer API and PNR data to States in the PAXLST and PNRGOV formats, respectively, as per the standards.
- 1.6 Increasingly however, States are requiring airlines to provide non-standard data. The impact of additional non-standard data requirements on airlines and, in turn, their technical suppliers and customers is often not understood by States.
- 1.7 Since the standards are part of the [ICAO Universal Security Audit Programme](#), States are informed of the possible consequences of unintended non-compliance and thus with having a finding against the State in the ICAO security audit.

2. Types of Non-Standard Requirements

- 2.1 Airlines that are members of the IATA CAWG have collected information on non-standard data requirements made by States implementing and developing their API, iAPI and PNR systems around the world (refer to Appendix). The most prevalent types of non-standard requests identified as per the following sections.

2.1.1 Non-Standard Data Elements

The WCO/IATA/ICAO Guidelines on API state that airlines’ systems are not geared to collect additional or ad hoc data that is not otherwise collected as part of the normal course of business. The same holds true for the PNR Guidelines (ICAO Doc 9944), which notes that States should not require or hold an aircraft operator responsible for submission of PNR data that is not already collected or held in an operator’s Reservation or Departure Control Systems.

Some States are requiring that non-standard data be included in airlines’ reservation systems, even though the same data may already be in scope of existing industry standard message structures (SSR and OSI) within the existing UN/EDIFACT PNRGOV message structure.

In other instances, States are requiring non-standard data that is not collected for operators' own business purposes as typical reservation entries and as a result, may not be accommodated in the PNRGOV message format.

Examples of non-standard requirements made by States include:

- Emergency contact information
- Next of kin information
- Health-related information
- Estimated departure and estimated arrival times

2.1.2 Non-Standard Format and Transmission

States should adhere to receiving data only in standard formats, UN/EDIFACT PAXLST for API and iAPI, and PADIS-based EDIFACT for PNRGOV, as well as the related transmission protocols.

There are States that have required transfer of API and PNR data by email, which is unmanageable and unpractical for several reasons, including data security and privacy.

There are also States that have placed requirements on operators to engage third-party service providers to reformat global-standard compliant data into proprietary government formats at the airlines' expense.

2.1.3 Non-Standard Timing

Some States have adopted national legislation requiring airlines to collect non-standard data when reservations are made. Often, aircraft operator tickets are sold internationally through agents, and therefore it is not possible to enforce data collection.

Furthermore, as flights open for reservation up to 331 days prior to departure, some information being required may simply not exist or be available at the time of booking or may change extensively in the period prior to departure.

States need to acknowledge that data provided by customers, or their agents, during the time of booking, is unverified and may be unreliable.

Requirements for non-standard or ad-hoc data often means that airlines have to collect this information verbally at the airport which necessitates manual data input. This either results in two-step check-in processes, initially and partially remotely using self-service online tools and a second on arrival at the airport thereby negating the ability entirely to check-in remotely.

2.1.4 Inefficient Use of Data / Formats

Some States are requiring airlines to provide API, iAPI and/or PNR data, when the State does not review or use the data. This is especially evident where States have iAPI but provide a blanket positive boarding directive, interspersed with unsolicited no board messages, which means airlines are not relieved from manual eligibility checks and not reaping the expected benefits of implementing a costly iAPI system.

Similarly, it has become apparent that most States requiring both API and PNR, or iAPI and PNR data do not review or use the two together. API/iAPI and PNR are often received by different agencies that may be restricted from sharing information with each other. As a result, airlines are expected to review PNR data and identify potential 'issues' even when receiving an iAPI 'ok to board'. This creates a gap in border risk assessment as the information being provided by airlines is not being used to its maximum opportunity, yet airlines are held to high standards of data provision investment and compliance. This goes against the single window concept, as per the Standard 9.1 of ICAO Annex 9.

3. Challenges for Airlines to Manage Government's Non-Standard Requests

There are various challenges for airlines associated with adapting to States' non-standard data requirements.

Airlines' processes are moving away from airport-based face-to-face transactions with passengers. Similarly, to State-implemented automated border controls, airlines are deploying self-service applications, including check-in via kiosks, online and mobile apps. Any direction by States to increase the extent and amount of passengers' personal data which must be collected by airlines simply impedes that evolution in business practices being demanded by their customers.

In fact, this trend could cause a renewed focus on the manpower-intensive, far less efficient, individual manual check-in transactions of the last decade and century. Such requirements are not aligned with current design and planned capacity of new and modern airport terminals. In addition, they do not recognise the existence of 'front of house' security threats which target high-visibility locations with large crowds, like airport check-in halls.

4. Recommendations

4.1 The following recommendations to achieve adherence to standards and cease non-standard requests are based on two principles:

4.1.1 Raise awareness of current standards with States

- ✓ Security and Border Control Agencies to be better informed of the existing standards and internationally agreed best practices that have been developed and approved relating to the collection, formatting and transmission of API, iAPI and PNR data.
- ✓ WCO, ICAO and IATA have developed guidance documentation – the [API-PNR Toolkit](#) - which provides comprehensive references for all stakeholders working with passenger data.

4.1.2 New data elements may only be requested after inclusion in a future amended ICAO/IATA/WCO standard through a formal approval process. In doing so:

- ✓ States need to demonstrate that any new data element being requested is necessary for border security or other critical border risk purposes.
- ✓ States must follow the formal request and approval process to include any new data elements into the existing standards for API and PNR via the WCO/IATA/ICAO Contact Committee, before imposing the requirement on airlines.
- ✓ States to allow airlines and their system providers sufficient time to implement changes based on new standards in order to minimise the impact on airlines systems and customer facilitation and to increase compliance

Appendix
Non-Standard Data Requests
(States names removed for confidentiality)

Issue	Data type	Variation
1	iAPI/API	Unclear request, not sure if interactive or not, no clear specification
2	iAPI	Document type code Q - traveller is exempt from prescribed IRPA document requirements
3	API	Eticket number requested as part of API
5	iAPI	Providing default 'ok to board'
6	API	Aircraft Tail number
7	API	Fake visa number is requested
8	API	Secondary documents are mandatory
9	iAPI	Non standard document types
10	API	Channel processing information
11	API	Require fake e-ticket number if carrier does not generate one as part of business process from LCC
12	API	Secondary document to be reported as an 'O'
13	API	Enter API data manually to be uploaded to a in-house portal
14	iAPI	Airlines to send Country of Arrival rather than Airport code
15	API	Must send to two different addresses - no single window
16	API	Does not accept a UN/EDIFACT formatted message directly from carriers as it has its own proprietary format. Carriers must pay a third party to convert standard UN/EDIFACT formatted message into the government's proprietary format.
17	API	Not adhering to single window API needs to be sent to multiple sources
18	API	Request passenger manifest (API/PNR) via mail address
19	iAPI	Providing default 'ok to board'
20	API	Only the following primary travel documents are supported by this system: P, O, N and I. If a passenger is traveling with a military ID or a Refugee Document, as a primary travel document, Countries that use the APP system expect to receive code "O" and countries which use the official
21	API	Bag tag numbers required as part of API
22	iAPI	Require ticketed bookings to contain a date of birth 72 hours before travel.
23	iAPI	Require emergency contact details
24	iAPI	Full address in the destination country
25	iAPI	Country of residence
26	API	Bag weights required