Inadmissible Passengers in International Air Transport: Challenges, Impacts and Policy Recommendations

Disclaimer

The information contained in this report is provided for general informational purposes and reflects the regulatory frameworks and practices reviewed at the time of the study.

Laws, regulations, policies and practices may change over time and may be subject to differing interpretations and application. This report does not constitute legal advice and should not be relied upon as a substitute for advice on the laws and requirements applicable in a particular jurisdiction.

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Executive Summary

In recent years, the number of Inadmissible Passenger (INAD) cases at international borders has increased, reflecting the growing complexity of international travel and border management. At the same time, evolving security considerations, changing migration patterns, and shifting entry requirements have created new challenges for both States and airlines, highlighting the need for greater coordination, information sharing, and operational agility. This report examines the prevention, management, and removal of Inadmissible Passengers through quantitative surveys and stakeholder interviews on legal and regulatory frameworks across jurisdictions. It analyses the regulatory, operational, and financial implications of INAD cases for both carriers and States, while also exploring broader facilitation and border management factors that influence admissibility outcomes. In addition, the report reviews the effectiveness of existing preventive measures, including digital verification tools, State support mechanisms, and escalation procedures for complex cases.

The findings show that effectively managing inadmissible passengers requires a shared-responsibility approach involving airlines, States, and other border management stakeholders. While airlines play an important role in verifying travel documents and supporting compliance with entry requirements, many INAD cases may arise from factors that carriers find difficult to assess or control. These include complex or rapidly changing entry requirements, information available only to government authorities, discretionary border decisions, passenger fraud or misrepresentation, and wider geopolitical and migration-related developments.

The analysis highlights the importance of stronger cooperation between governments and industry and greater use of preventive tools and technologies to reduce inadmissibility cases and support more efficient border management processes.

Drawing on these findings, the report presents policy recommendations to promote a balanced, risk-based, and collaborative approach to INAD management, consistent with ICAO Annex 9 – *Facilitation*, particularly the Standards and Recommended Practices (SARPs) contained in Chapter 5 on Inadmissible Persons and Deportees.

The report calls for enhanced cooperation and shared accountability among States, carriers, and other stakeholders; proportionate and effective compliance frameworks; improved access to timely and accurate information; wider adoption of digital verification tools; and clearer procedures for notification, custody, and removal of INADs. It also emphasises the importance of ensuring that liability and cost-allocation mechanisms remain fair and proportionate, particularly where carriers have exercised due diligence and inadmissibility results from circumstances beyond their reasonable control.

By promoting regulatory clarity, transparency, and cooperation, these measures can strengthen border security and immigration objectives while facilitating safe, efficient, and predictable international air travel.

Chapter 1. Who are the 'Inadmissible Passengers'?

An inadmissible passenger (INAD) is an individual who is denied entry into a country by border control authorities because they do not meet that country's immigration, documentation, security, or other entry requirements. Inadmissible persons may include both passengers and crew members arriving

on international flights. ICAO Annex 9 – Facilitation provides the international framework for managing INADs, including the respective responsibilities of States and air carriers[1].

ICAO Annex 9 distinguishes between improperly documented persons and other categories of inadmissible persons:

1) Persons with Document or Travel Authorization Issues: These are individuals who do not meet a state's entry requirements because of problems with their travel documents or required authorizations. Examples include persons who:
   a. Travel with an expired or otherwise invalid travel document;
   b. Use counterfeit, forged, altered, or fraudulent travel documents or visas;
   c. Use another person's travel document or visa (sometimes referred to as an "impostor");
   d. Travel without a required travel document; or
   e. Travel without a required visa or other entry authorization.

In many cases, these individuals attempt to enter a country using documents that are invalid, fraudulent, or not theirs.

2) Persons Refused Entry for Other Reasons: some persons may possess valid travel documents and visas, where required, yet still be denied entry by border authorities. In these cases, the individual has generally met the document verification requirements carried out by the airline before departure but is refused admission for reasons that are outside the airline's control.

Reasons for refusal may include insufficient supporting documentation, concerns identified through government border control systems, failure to meet financial or other entry requirements, or other decisions made by the destination State's authorities. In some cases, airlines do not always receive full disclosure of the reasons for refusal, which can confuse them about the best approach to adopt.

Chapter 2. Inadmissibility Factors

The study examines inadmissibility cases across two broad categories: factors within the airline's control and those beyond the airline's control.

Factors within the airline's control include situations where persons:

- Travel without acceptable documents for entry or transit;
- Travel with an expired passport, visa, or residence permit;
- Do not meet the entry requirements of the transit or destination country; or
- Hold travel documents that do not meet validity or passport-page requirements.
- Use a travel document that does not match the holder; and
- Use fraudulent documents where the irregularity is reasonably detectable without specialized equipment.

[1] Under ICAO Annex 9 (Facilitation), an inadmissible person is defined as "a person who is or will be refused admission to a State by its authorities."

Factors beyond the airline's control include situations involving:

- Refusal reasons that are not disclosed by immigration authorities;
- Government decisions based on information unavailable to airlines;
- Passengers identified on national or international watchlists;
- Immigration or security risk assessments conducted by State authorities; and
- Sophisticated fraudulent or counterfeit travel documents that cannot reasonably be detected during standard airline document checks.

The study found that both controllable and non-controllable factors drive inadmissibility. However, airlines have reported that most INAD cases arise from circumstances outside their visibility and control.

In particular, survey results revealed a significant number of cases involving false or fraudulent credentials. Follow-up interviews indicated that these cases are frequently linked to broader challenges such as irregular migration, document fraud, and refusals based on government immigration, security, or protection-related assessments. These findings suggest that the causes of inadmissibility increasingly extend beyond traditional document or visa compliance issues. Instead, they reflect a more complex border management environment in which inadmissibility decisions are often influenced by migration, security, and protection considerations that airlines cannot assess or prevent.

Improperly Documented Persons

ICAO Annex 9 defines an improperly documented person as an individual who travels, or attempts to travel, with no travel document or an invalid travel document (i.e., a counterfeit, forged, or altered travel document or visa; another person's travel document or visa; or without a required visa). These cases generally involve failures to meet basic travel document or entry requirements and are traditionally considered within the airline's sphere of responsibility.

The study confirmed that such cases continue to occur and are most linked to visa and travel document issues identified at check-in. Examples include missing or expired visas, problems related to electronic visa proofs, and errors in assessing entry requirements, such as whether a national identity document may be used in place of a passport or whether a travel document meets validity requirements.

Airlines reported cases where passengers appeared to meet documentation requirements at departure but were subsequently deemed inadmissible because specific entry conditions were not fully understood or correctly applied. For example, a country may require proof of onward travel but only accept an onward airline ticket. A passenger may therefore travel by air based on an onward land transportation ticket that appears to satisfy the requirement yet be found inadmissible upon arrival because the state does not consider it sufficient proof of onward travel. Where these details are not clearly reflected in operational guidance or are not well understood by frontline staff, errors may occur.

Most airlines reported that frontline personnel are generally well trained and supported by document verification tools, including IATA Timatic[2]. Nevertheless, mistakes can still arise, particularly in high-pressure operational environments, during periods of heavy passenger volumes, or in complex interline and codeshare arrangements where boarding decisions must be made quickly.

Another category involves passengers who appear to be properly documented but whose information is incorrectly transmitted to government authorities through Advance Passenger Information (API) systems. These situations may result from manual data-entry errors, multiple document updates, or technical and process issues involving departure control systems or third-party service providers.

For example, authorities reported cases where a passenger was incorrectly presented as a transit passenger rather than an arriving passenger. While these incidents may lead to inadmissibility outcomes, they are fundamentally data-quality and system-integrity issues rather than documentation failures.

Airlines operating in certain regions such as the Middle East and Africa identified recurring cases involving expired or cancelled residence permits; visa information entered without verifying current validity; or inaccurate passenger information. In instances where airline staff or handling agents intentionally alter passenger data to obtain a favourable boarding response, such as by modifying nationality or document information to trigger visa exemption or visa-on-arrival eligibility, the issue constitutes deliberate data manipulation rather than an error in document verification. These cases fall within airlines' legitimate responsibility, and airlines should maintain robust policies to minimise their occurrence. However, the study found that these cases represent only one component of the broader inadmissibility landscape. Most surveyed airlines estimated that documentation and processing errors account for approximately 20% to 30% of their total inadmissibility cases.

This distinction matters because some national regulatory frameworks still classify a broad range of inadmissibility outcomes as airline failures in document verification. The study points to a more nuanced reality: even when cases are considered controllable, travel requirements may be unclear, interpreted inconsistently, or insufficiently digitised.

These challenges are especially pronounced when visas are not machine-readable, local documentation practices vary, or entry requirements change frequently, increasing the risk of errors despite airlines' reasonable compliance efforts.

Visa and Visa-Waiver Overstays

One category of INADs identified in the study involves visa and visa-waiver overstays. Differences in how countries detect and enforce these overstays can add further uncertainty for airlines.

For example, several airlines operating flights to the Schengen Area identified visa overstays as one of the most challenging causes of inadmissibility. Under the Schengen 90-180-day rule[3] non-EU nationals can enter Schengen Area countries as many times as they want, but can stay for a total of 90 days every 180 days across all Schengen countries combined. For an airline, determining whether

[2] The IATA Travel Information Manual Automatic (Timatic) is a database containing documentation requirements for passengers travelling internationally via air, e.g. passport and visa requirements.
[3] https://home-affairs.ec.europa.eu/policies/schengen/visa-policy_en

a passenger has exceeded this limit requires manually reviewing their previous travel history through entry/exit stamps, often across multiple countries. Airlines reported that this can be difficult to assess during the time-sensitive check-in or boarding process because manually reviewing passport stamps can be recourse and time-sensitve, and airlines may not have access to complete travel records. As a result, a passenger may hold valid travel documents but still be found inadmissible on arrival if authorities determine that the permitted stay has been exceeded.

False or Fraudulent Travel Documents

The study identified the use of false or fraudulent travel documents as a leading cause of inadmissibility4. These cases include counterfeit or altered passports, fraudulent visas, swapped boarding passes, and travel documents used by impostors.

Several airlines reported an increase in fraudulent travel documents, and in some locations, particularly those affected by geopolitical instability, detection of document fraud accounted for a significant number of immigration refusals.

Airlines consistently noted that fraudulent documents are becoming increasingly sophisticated and difficult to detect in the fast-paced airport environment. Frontline personnel often have limited time to make decisions and lack access to the verification tools available to government authorities. Nevertheless, several airlines reported that specialised document-fraud training, sometimes delivered jointly with government agencies, has improved detection rates. However, these programmes may require significant investment and resources.

These findings are particularly relevant in light of ICAO Annex 9, which distinguishes between the check's airlines are expected to perform before boarding and the broader determination of a passenger's admissibility, which remains the responsibility of States. ICAO provisions recognise that while aircraft operators must take necessary precautions to verify prescribed travel documents at embarkation, the competent State authorities remain responsible for determining whether a traveller is admissible.[5]

ICAO Standards also require States to seize fraudulent, falsified, or counterfeit travel documents, as well as documents used by impostors.[6] This helps prevent reuse of such documents for irregular migration or other unlawful purposes. In response, some States have implemented targeted awareness campaigns and route-specific support measures, including real-time document verification assistance for airlines operating on identified high-risk routes.

These initiatives demonstrate the benefits of cooperation between governments and industry. However, they also highlight an important principle: while airlines play a critical role in screening travel documents before boarding, airlines cannot replace States' responsibilities for verifying document authenticity and determining admissibility.

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[4] Among surveyed airlines, 46 out of 49 reported cases involving false credentials, while 20 out of 22 government authorities indicated they had encountered similar incidents.

[5] ICAO Annex 9, Chapter 3, Standard 3.35.3.

[6] ICAO Annex 9, Chapter 3, Standard 3.35.1.

The prevalence of false credentials appears to be primarily linked to irregular migration and protection-seeking movements rather than shortcomings in airline screening processes. Certain international routes, particularly those associated with established migration flows, have been identified as higher risk. One airline, for example, reported recurring cases involving counterfeit or substituted documents on routes into Europe, including some operated under codeshare arrangements where the operating carrier has limited visibility over boarding procedures at the point of departure. These situations create complex operational and legal challenges, as airlines may still be held liable for transporting inadmissible passengers despite limited ability to detect sophisticated fraud across fragmented network operations.

Migration Trends and Inadmissibility

Migration-related issues emerged as major, growing drivers of inadmissibility cases that airlines considered beyond their control. Rather than isolated incidents, many cases reflected broader and evolving migration patterns affecting particular routes. Airlines reported that visa regimes, protection and asylum systems, smuggling networks, and broader geopolitical developments influence these trends. The routes and nationalities most affected tend to change over time in response to conflicts, migration pressures, and adjustments to national immigration policies.

One commonly reported trend involves the misuse of transit and visa-free travel arrangements. Airlines described situations where passengers hold valid documentation for transit or onward travel, but indications suggest they do not intend to complete their planned journey. Instead, they may seek to remain irregularly in the transit country, continue their journey through alternative means, or apply for asylum or other forms of protection at the transit point.

Another recurring issue concerns onward or return ticket requirements. Airlines reported cases in which passengers obtain return or onward tickets solely to meet boarding requirements, often through third-party facilitators. These tickets may be cancelled after travel has commenced, leaving passengers without valid onward travel arrangements and increasing the risk of inadmissibility at transit or destination points.

Airlines also identified certain routes and travel flows that, during the study period, were associated with increased risks of irregular migration, document fraud, and protection claims. These patterns were observed across Europe, the Asia-Pacific region, and the Americas and involved passengers travelling from a range of countries in Asia, Africa, and Latin America. Airlines emphasized that such trends are highly dynamic and can shift rapidly in response to geopolitical developments, economic conditions, and changes in migration policies.

Airlines operating in Central and South America reported cases of passengers travelling through the region with plans to continue overland toward the United States. At the same time, some airlines observed an increase in attempted irregular entry and protection claims in Europe, which interviewees linked to changing migration controls and enforcement measures elsewhere.

North American airlines highlighted additional challenges involving travel to Mexico and certain Central American countries. In some cases, third-country nationals use these routes to extend or reset temporary stay arrangements. While destination countries may initially accept visas issued by another State for entry, passengers may later be deemed inadmissible and have difficulty returning to their point of departure because of visa expiry, cancellation, or concerns about misuse. This can create significant operational challenges for airlines, particularly where passengers cannot be returned to their previous point of departure and must instead be transported to their country of nationality or another State willing to admit them.

Some airlines noted that these situations appear inconsistent with international principles that generally require the State of departure to re-admit passengers for further examination.

A related concern involves the deliberate destruction of travel documents and false nationality claims. Airlines reported cases in which passengers destroyed documents during or shortly after a flight, making identification more difficult and, in some instances, supporting claims of protection under alternative identities. Airlines noted that these cases often show recurring indicators, including one-way or last-minute bookings, limited baggage, and other travel patterns associated with irregular migration. They stressed that such incidents are rarely isolated and may be linked to organised criminal networks.

In some cases, airlines identified travel agents or intermediaries suspected of facilitating such activity by advising passengers on travel documentation, expected behaviour, and responses to immigration questioning. Where appropriate, airlines shared relevant information with authorities to support further investigation.

Although airlines reported increased awareness of these issues and strengthened training and prevention measures, they also highlighted important limitations. Denying boarding based solely on perceived risk indicators may expose carriers to discrimination claims, legal challenges, and reputational damage. As a result, cooperation with Immigration Liaison Officers (ILOs)[7] and other government authorities remains essential, particularly where States have intelligence on emerging migration trends and risk indicators that airlines cannot access independently.

Inadmissibility Based on Immigration and Security Assessments

Not all inadmissible passengers are identified during document verification. In some cases, travellers present valid passports, visas, and other required travel documents but are still refused entry on arrival after an assessment by border authorities. These decisions fall within States' sovereign authority and are beyond airlines' competency.

The study found that a substantial proportion of inadmissibility cases arise from immigration or security assessments conducted by government authorities. These decisions may be based on a range of factors, including the traveller's stated purpose of travel, insufficient financial means, previous immigration violations, entry bans, security concerns, or other risk indicators.[8]

As a result, a passenger may appear to meet entry requirements at departure, leave the country, and still be denied admission after an interview or further examination by border officials at the destination. For example, a traveller with a valid tourist or student visa may be refused entry if

[7] ICAO Annex 9 does not define ILO, which are defined by the International Organization for Migration as a " representative of a State or authority posted abroad to help prevent irregular migration, manage legal migration routes, and facilitate the return of irregular migrants'. However, ICAO Annex 9 Recommended Practice 3.34 cites: "Contracting States should consider making arrangements with other Contracting States to permit the positioning of liaison officers at airports in order to assist aircraft operators to establish the validity and authenticity of the travel documents of embarking persons".

[8] In the quantitative survey, these cases correspond to the categories *"immigration or security risk assessment"* and *"passenger is blacklisted"*, reported by 20 of the 22 surveyed authorities and 35 of the 49 responding airlines.

authorities find that the declared purpose of travel is not credible or does not match the conditions of the visa.

Such cases pose significant operational and financial challenges for airlines, which are often required to arrange and facilitate the return of passengers deemed inadmissible.

Limited Access to Reasons for Refusal

Despite the distinction of responsibilities established in ICAO Annex 9, airlines frequently receive limited information regarding the reasons for a passenger's refusal of entry. Many carriers reported that authorities simply notify them that a traveller has been deemed inadmissible and must be returned, without providing additional details.[9]

Interview findings suggest that authorities are more likely to share detailed explanations when they believe the airline contributed directly to the inadmissibility outcome. In other circumstances, however, carriers often receive only a notification that a passenger has been refused entry and must be removed. Some airlines reported receiving instructions prior to departure not to board passengers without explanation, while others described post-arrival cases in which travellers were classified as "undesirable" or denied entry following an interview, again with little or no supporting information.

While legitimate security and intelligence considerations may justify restricting disclosure of certain information, withholding non-sensitive information can create practical difficulties for airlines. Greater transparency, where operationally and legally feasible, would help airlines identify recurring trends, enhance preventive measures, and better distinguish between inadmissibility cases linked to documentation issues and those arising primarily from sovereign immigration or security decisions.

Chapter 3. Regulatory Frameworks Governing INAD Cases

While the ICAO Annex 9 Standards and Recommended Practices (SARPs) provide a common global baseline, their application in national regulations varies significantly across jurisdictions. A key finding is that national frameworks differ in how they allocate responsibilities between States and airlines. Consequently, airlines may face inconsistent obligations, procedures, costs, and enforcement measures for comparable INAD cases, depending on the country concerned.

A growing issue is the lack of cooperation and communication between border control authorities of the States dealing with INADs. This can result in people being shuttled back and forth between States because of disagreements about their status[10] and the governing regulations. For example, a passenger who is not accepted in another country and cannot be transported back as inadmissible will be “stuck” as inadmissible, and the burden still falls on the airline deemed to transport the person. ICAO Annex 9, Standard 5.1, requires States to communicate and cooperate to resolve their

[9] Forty of the 49 responding airlines reported instances in which immigration authorities did not disclose the underlying reasons for a passenger's inadmissibility.

[10] Doc 9957 – Facilitation Manual Edition 2023

differences promptly. It is intended to prevent situations in which the States concerned shift responsibility for inadmissible persons onto the aircraft operators, who cannot resolve the issue without the States' involvement.

The study also identified collaborative and risk-based approaches. Some national regulatory frameworks limit carrier liability to issues that can be readily identified during check-in or boarding. Cooperative arrangements, including Memoranda of Understanding (MoUs) between governments and airlines, also clarify expectations, facilitate information sharing, and promote more predictable compliance and cost-allocation practices. In these cases, airlines may avoid penalties or receive reduced penalties by demonstrating due diligence and making reasonable efforts to verify travel documentation.

Common Enforcement Practices and Challenges

Countries use a range of enforcement measures to ensure compliance with immigration and border control requirements. While approaches differ, the most common practices include:

- Administrative fines and penalties imposed on airlines when passengers arrive without the required travel documents, visas, or other entry authorisations.
- Carrier removal obligations, requiring airlines to transport inadmissible passengers out of the country, often at the airline's expense.
- Recovery-related costs, such as accommodation, meals, medical assistance, security arrangements, detention costs, or supervision of pending removal.
- Inspection and audit programs to assess whether airlines have effective document verification and compliance procedures in place.
- Risk-based enforcement, where penalties may be reduced or waived if an airline can demonstrate that it exercised due diligence and took reasonable steps to verify passenger documentation.
- Cooperative compliance arrangements, such as Memoranda of Understanding (MoUs) or trusted-carrier programs, encourage collaboration between border authorities and airlines and may provide greater flexibility in the application of penalties.
- Operational directives or corrective actions, requiring airlines to strengthen training, revise procedures, or implement additional controls to prevent future incidents.
- Enhanced government oversight and monitoring, including the use of Advance Passenger Information (API) and Passenger Name Record (PNR) data to assess compliance and identify trends.
- Restrictions or sanctions in serious or repeated cases, which may include increased scrutiny of flights, suspension of certain operational privileges, or other regulatory measures.

Airlines have reported that ICAO Annex 9 SARPs are applied differently across States and, in some cases, even at individual airports within the same State. Examples included inconsistent interpretations of issues such as missing signatures, faded stamps, and damaged passport pages. Airlines and State representatives that participated in the study suggested that clearer guidance, consistent enforcement, and closer cooperation between governments and airlines would increase certainty, support compliance, and help prevent avoidable inadmissible passenger cases. As this report repeatedly notes, enforcement is most effective when it balances accountability with

cooperation and recognizes when airlines have acted diligently and some INAD cases may result from factors beyond their reasonable control.

Chapter 4. Notification, Custody, and Removal

Removal Procedures and Operational Challenges

Under ICAO Annex 9, Standard 5.4, once competent authorities determine a passenger is inadmissible, they must notify the aircraft operator and consult with it on the timing of the removal. This consultation is intended to provide the airline with sufficient flexibility to make the necessary operational arrangements, whether through its own services or, where appropriate, through another carrier. The objective is to facilitate an orderly and practical removal process while taking into account both regulatory requirements and operational realities.

To support the removal process, States must provide the aircraft operator with the necessary documentation. As per ICAO Annex 9 - Facilitation, Standard 5.5, this includes a removal order, which formally instructs the airline to remove the inadmissible person from the State's territory and serves as evidence of the administrative decision requiring removal. In certain circumstances, for example, when a passenger has lost or destroyed the travel document (ICAO Annex 9, standard 5.6), States must also provide supporting documentation, such as cover letters containing information about the individual and the circumstances of the case. These documents are intended to facilitate processing by the destination State and are recognised under ICAO Annex 9 - Facilitation as sufficient documentation for examination upon arrival.

The study found significant variation in how States implement procedures for notifying, holding, and removing inadmissible passengers. While airlines generally arrange transportation for removal, the associated requirements, timelines, and operational expectations differ considerably across jurisdictions. Some States require removal on the first available flight or within a prescribed period, whereas others adopt a more flexible approach that accounts for operational constraints and available transportation options.

A recurring theme in interviews was the pressure on airlines to expedite removals. Participants described cases in which authorities held, or threatened to hold, aircraft on the ground until removal arrangements were confirmed. Interviewees said authorities sometimes invoked the prospect of operational delays to encourage same aircraft returns or immediate removal solutions, even when seats, security escorts, travel documents, or practical routing options were unavailable.

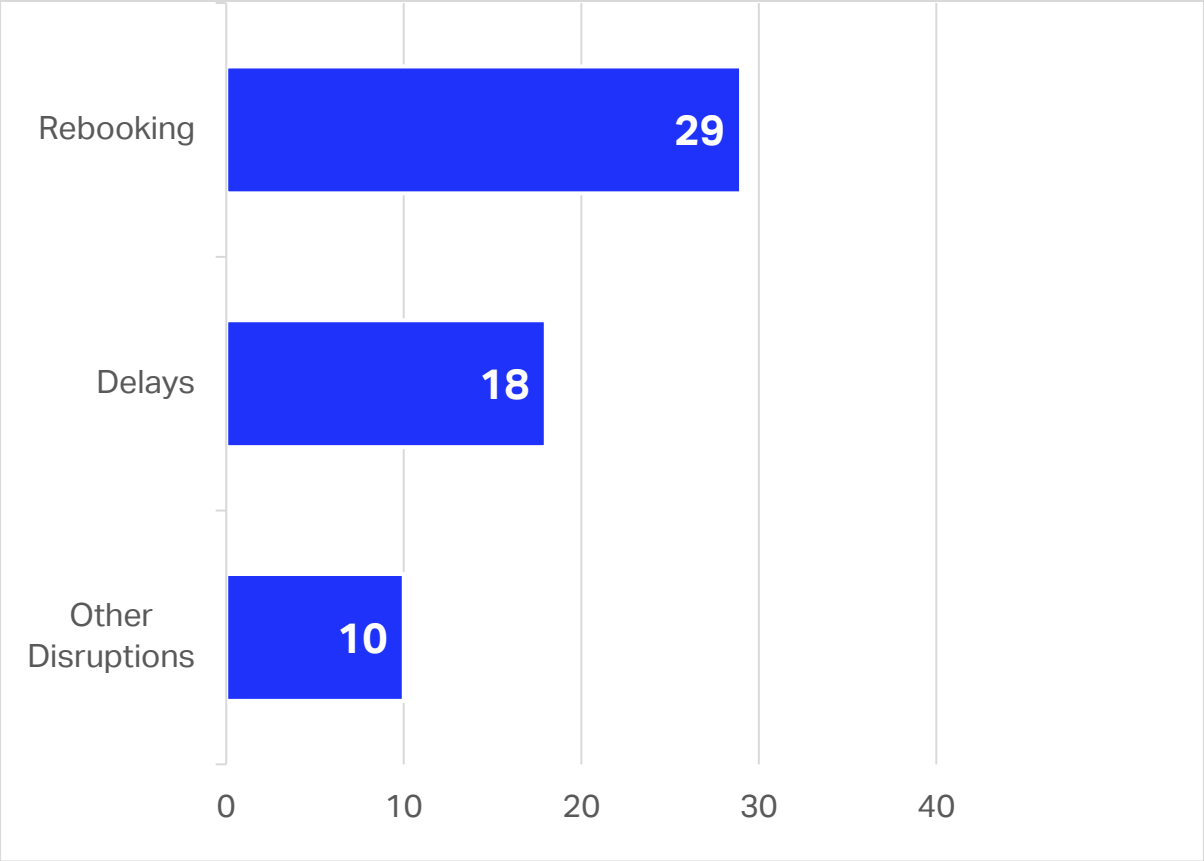
This practice was reported to be especially common at airports with limited facilities for accommodating inadmissible passengers in the sterile restricted area (SRA). In these locations, authorities may prioritize rapid removal because holding capacity is limited, despite the operational challenges this may create for airlines.

The study also highlighted the broader operational disruptions associated with managing inadmissible passengers (see Figure 1). Airlines reported impacts including delayed departures, aircraft held on the ground, passenger rebooking and rerouting, difficulties preserving revenue-generating seats during peak travel periods, and significant internal coordination efforts required to arrange security escorts, identify alternative routings, or secure last-minute acceptance by another carrier.

Airlines indicated that these situations could result in substantial operational and financial consequences. Reported impacts included missed passenger connections, disruption to aircraft and crew schedules, network-wide delays, crew duty-time limitations, increased administrative workload, and the loss of revenue-generating seats. Several carriers also reported that authorities encouraged them to arrange removals through third-party operators to accelerate the process, despite the additional costs and logistical complexities of coordinating transportation across multiple carriers.

Overall, the findings suggest that while ICAO Annex 9 - Facilitation promotes consultation and cooperation between States and aircraft operators, implementation practices vary widely. Greater alignment with Annex 9 - Facilitation procedures could help ensure removal requirements are applied in a way that balances border control objectives with operational feasibility, reducing unnecessary disruption and financial implications for both States and airlines.

Number of surveyed airlines that have reported INAD-related operational disruptions.



Data from the 2025 airline quantitative survey

Chapter 5 Transit, Return, and Cooperation Between States

ICAO Annex 9 establishes a framework to facilitate the orderly removal of inadmissible passengers and to ensure cooperation among States throughout the process. Under Standard 5.11, an aircraft operator must remove an inadmissible passenger either to the point where the individual's journey commenced or to any place where the individual is admissible.

To support practical and efficient removals, ICAO Annex 9 encourages States to consult with aircraft operators on the most appropriate removal destination. This allows authorities and airlines to identify solutions that meet immigration requirements while minimizing operational complexity and unnecessary costs.

ICAO Annex 9 also places obligations on States involved in the return process. Under Standard 5.12, a State must accept for examination a person removed from another State if the person's journey commenced in its territory. At the same time, the receiving State should not return that individual to the State where the inadmissibility determination was originally made. These provisions are intended to prevent situations in which inadmissible passengers are repeatedly transferred between States without a clear resolution.

In addition, Standard 5.13 requires States to accept the covering letters and supporting documentation provided under Annex 9 as sufficient evidence to facilitate the individual's examination upon arrival. This provision is intended to simplify administrative procedures and support the efficient processing of returned passengers.

Practical Challenges in Implementing ICAO Annex 9 - Facilitation

Despite the clarity of these provisions, the study revealed significant challenges in implementing ICAO Annex 9. A common concern raised by airlines was inconsistent cooperation among States in facilitating the return of inadmissible passengers.

Several carriers reported cases in which the State where the passenger journey originated was reluctant to accept the individual's return or imposed conditions that complicated the removal process. Examples included requirements for notification within very short time frames, refusal to accept returns after a specified period, insistence on original travel documents rather than ICAO Annex 9 covering letters or temporary documentation, and requests for proof of nationality that could be difficult or impossible to obtain when passengers had destroyed their documents.

Airlines also highlighted challenges associated with routing inadmissible passengers through third countries. In some cases, transit States refuse to accept inadmissible passengers altogether or require transit visas, even when the passenger is merely transiting during the removal process. Several carriers identified particular difficulties when routing passengers through major transit hubs, including in the Gulf region and Türkiye. As a result, airlines may be forced to use longer, less efficient, and more costly itineraries to complete the removal.

Additional complications arise where transit States require advance notification and detailed information regarding the reasons for inadmissibility before authorizing transit. As discussed elsewhere in this study, immigration authorities do not always disclose the grounds for inadmissibility to airlines. Consequently, carriers may be unable to satisfy the information requirements imposed by transit States, further delaying removal arrangements.

Interviewees also noted that direct communication and coordination between State authorities remain limited in many cases. Airlines frequently act as intermediaries between governments, despite having limited authority to resolve immigration, nationality, or transit-related issues. This can prolong the removal process and increase both operational complexity and costs.

Emerging Challenges in Migration Contexts

Several airlines, particularly those operating services to and from the Americas, reported growing challenges linked to complex migration movements. Interviewees described cases involving passengers, often Venezuelan nationals, who had been residing unlawfully in the United States and subsequently attempted to travel onward through Latin America. According to airlines, some of these passengers were later found inadmissible at transit points because they lacked valid travel documents or onward travel arrangements.

These cases can be especially difficult to resolve. Passengers may be unable to return to their previous location, may not qualify for entry into another State, or may be unwilling to cooperate with removal procedures. Combined with transit restrictions and limited routing options, these circumstances can lead to prolonged stays in detention facilities or airport holding areas while authorities attempt to determine a viable solution. Airlines reported that the associated costs of accommodation, security, welfare support, and transportation are often borne largely by the carrier.

Limited Flexibility in Removal Destinations

Interview findings also suggest that the flexibility provided by ICAO Annex 9 Standard 5.11 is not always fully reflected in operational practice.

Although the Standard permits removal either to the point where the journey commenced or to any location where the individual is admissible, several airlines reported instances in which authorities insisted on a single return option despite more practical alternatives.

One carrier cited a case involving an African continent national who was found inadmissible in France after travelling from Colombia. According to the airline, authorities required the passenger to be returned to Colombia within a strict timeframe, even though removal directly to the country of origin in Africa would have been operationally simpler and potentially less costly. Implementing the required itinerary required deploying escorts from Colombia and created additional logistical challenges that a more flexible application of ICAO Annex 9 principles might have avoided.

Missing Travel Documentation and Replacements

Removal delays become particularly acute when passengers have destroyed, lost, or surrendered their travel documents. ICAO Annex 9 addresses such situations through Standards 5.6 and 5.7, which require the State to issue a cover letter alongside the removal order and relevant supporting documentation. Standard 5.13 further provides that Contracting States should accept these cover letters and associated documents as sufficient for the purpose of examining the inadmissible passenger.

In practice, however, the acceptance of such documentation appears inconsistent. Airlines reported instances where third countries refused to accept cover letters during transit, as well as cases in which States of origin declined to readmit passengers without original or replacement documents, even when the journey had commenced from their territory. This challenge is particularly pronounced in situations involving missing identity documents or disputed nationality. In such cases, airlines often have limited means to verify citizenship while the passenger remains in airport facilities pending investigation by State authorities. These processes can be prolonged—sometimes extending over several weeks—during which airlines continue to incur costs related to care, custody, and associated obligations. The result is an administrative impasse in which airlines retain a formal obligation to remove the passenger but lack a legally and operationally viable way to do so.

These situations are frequently linked to asylum claims and broader protection dynamics. For example, carriers reported that in certain countries, some passengers destroy their documents and

resist removal, expecting that after a 21-day period in the airport's secured restricted area (SRA), they may be permitted to enter the national territory under domestic law. In such cases, airlines are expected to cooperate fully with ongoing investigations while simultaneously facing pressure to complete removal within the custody time limits. Interviewees noted that, in some instances, airlines may also face penalties if they do not complete removal within a prescribed timeframe.

Flight Safety and Disruptive Passenger Behaviours

Disruptive passenger behaviour was identified as a significant operational factor contributing to delays in removing inadmissible passengers. ICAO Annex 9 - Standard 5.8 requires the removing State to provide the operator with advance warning of any potential problems relating to an inadmissible passenger, including a security risk assessment where available, so the operator can take precautions to ensure flight security.

Interviews with both airlines and government authorities indicate that a passenger's conduct may deteriorate rapidly once removal becomes imminent. Airlines reported incidents involving refusal to board, physical aggression (including spitting and biting), self-harming behaviour, and other actions that may compromise the safety and security of the passenger and the overall flight. In such circumstances, the pilot-in-command may determine that the passenger cannot be carried safely and refuse transportation on operational safety or security grounds. Alternatively, authorities may need to arrange security escorts at short notice, which can delay the removal procedure and the flight's departure.

Although States are generally expected to take the pilot-in-command assessment into account, several airlines reported instances where penalties for delayed removals were nevertheless imposed, even when the delay arose from factors beyond the airline's control, including disruptive passenger conduct and safety-related operational decisions.

These challenges are frequently compounded by the limited availability of security escorts. Escorts may not be immediately available and, in some cases, must be deployed from another location, creating additional delays. Furthermore, when escorts are not law enforcement officials, national legal and procedural requirements may limit their ability to restrain or manage disruptive passengers. Such limitations may directly influence the flight crew's assessment of the risks associated with carriage and ultimately affect the final decision whether to transport the passenger.

Airlines also highlighted operational constraints associated with transferring inadmissible passengers between carriers. Some operators are reluctant to accept passengers from other airlines because of concerns about transit absconding, refusal to board, or disruptive behaviour during the journey. In addition, certain carriers impose limits on the number of inadmissible passengers that may be accommodated on a single flight. Interviewees noted that such restrictions are not always communicated in advance, reducing operational flexibility and limiting available routing options. As a result, these constraints can complicate removal arrangements and contribute to delays that are largely outside the control of the airline responsible for facilitating the passenger's return.

Overall, the findings demonstrate that flight safety considerations, passenger behaviour, escort availability, and carrier-specific operational limitations can significantly affect the timely removal of inadmissible passengers. These factors should therefore be considered when assessing accountability for delays in the removal process, as many arise from operational and safety considerations rather than airline non-compliance.

Chapter 6- Financial Impact of Managing Inadmissible Passengers

Allocation of Costs under ICAO Annex 9 - Facilitation

ICAO Annex 9 provides a clear framework for allocating responsibility for the custody, care, and removal costs associated with inadmissible passengers. Standards 5.9 and 5.9.1 define the respective obligations of aircraft operators and States in this area.

Managing inadmissible passenger cases creates a significant financial burden for airlines worldwide. Based on data from 49 participating carriers, the study estimates that airlines incurred an average annual cost of approximately USD 1.1 million per carrier in 2024 to manage and remove inadmissible passengers (see Figure 2)

The financial impact of these cases varies considerably across regions and jurisdictions. These differences mainly stem from variations in national legislation, sanction regimes, operational requirements, and the level of State support available during the removal process.

In some jurisdictions, government authorities provide services such as detention facilities, security escorts, accommodation, or other assistance at no cost to the airline. In other jurisdictions, carriers must bear some or all of these costs, in addition to transportation, administrative, and compliance-related expenses.

The legislative review further shows that many national legal frameworks either explicitly assign removal-related costs to airlines or do not clearly define the respective financial obligations of States and aircraft operators. As a result, airlines frequently absorb a substantial share of inadmissibility-related costs, regardless of the circumstances that led to the refusal of entry.

Regulatory analysis and stakeholder consultations indicate a widespread industry perception that the current allocation of responsibilities is often disproportionate. This concern is particularly acute where inadmissibility decisions are based on immigration, security, intelligence, or other government assessments that are not accessible to airlines and cannot reasonably be identified through document verification or passenger processing procedures.

Airlines reported a broad range of direct and indirect costs associated with managing inadmissible passengers, many of which are incurred in addition to fines or administrative penalties imposed by States. These costs include passenger transportation and re-routing, revenue losses from blocked or unavailable seats, custody and care expenses, accommodation, meals, translation services, security escorts, medical and welfare assistance, travel document replacement, and the administrative resources required to coordinate removal arrangements.

Across all regions, custody and care expenses, security escort costs, and government-imposed financial penalties were consistently identified as the most significant cost drivers. Airlines also highlighted the operational burden of managing INAD cases, including airline staff time, coordination efforts, and disruption to normal commercial operations.

These findings underline the substantial economic impact of inadmissibility management on airlines and point to the need for clear responsibilities, consistent procedures, and effective cooperation between States and aircraft operators to reduce unnecessary costs and operational inefficiencies.

The study indicates that current cost-allocation practices often extend beyond the principles established in ICAO Annex 9 - Facilitation. While aircraft operators are generally expected to facilitate removal once it has been ordered, many jurisdictions allocate a wider range of costs to airlines than envisaged under ICAO Annex 9 - Facilitation, particularly in cases arising from factors outside the airline's reasonable control.

Even where national legislation does not directly conflict with ICAO provisions, unclear rules on financial responsibility often lead airlines to absorb costs linked to State decisions, administrative delays, security assessments, and other circumstances beyond their control. These findings point to the need for clearer and more consistent application of cost-sharing principles to ensure a fairer balance of responsibilities between States and aircraft operators.

Figure 2. Average cost per INAD case per airline across IATA regions, including State penalties, custody and care, security escort, medical bills, administrative expenses, and other related costs.

IATA Region	Average Cost per INAD Case (USD)
Europe	$14,000
Africa & Middle East	$11,000
Americas	$9,500
Asia Pacific	$7,000
North Asia	$4,000

Data from the 2025 airline quantitative survey.

Physical Removal of Inadmissible Persons

The study revealed that airlines are generally responsible for arranging and financing the removal of inadmissible passengers, either by returning them to their point of departure or transporting them onward to another destination in accordance with ICAO Annex 9 – Facilitation provisions. While ICAO Annex 9 - Facilitation recognizes, through Standard 5.10, that aircraft operators may seek reimbursement of transportation costs from the passenger, airline interviews indicate that recovery is rarely achieved in practice, as many inadmissible passengers are either unable or unwilling to pay. Consequently, airlines frequently absorb the full cost of removal.

Several airlines reported that national requirements for passengers to hold a return or onward ticket can help mitigate some of these expenses, particularly when removal can be accommodated within the carrier's own network. Nevertheless, removal costs vary considerably depending on the circumstances of the case. Expenses may increase significantly where passengers must be rerouted through multiple jurisdictions, transported on another carrier, or returned to a destination different from their original point of embarkation.

Consistent with the framework established by ICAO Annex 9 - Facilitation, airlines are expected to facilitate the removal process once notified by the competent authorities. However, interview findings suggest that identifying practical, compliant, and cost-effective removal solutions can be operationally challenging, particularly where routing restrictions apply, flight availability is limited, or coordination with government authorities is constrained. In such cases, airlines may be required to arrange complex itineraries involving multiple carriers or, in exceptional circumstances, charter transportation to comply with removal requirements. These operational realities can substantially

increase the financial and administrative burden associated with the removal of inadmissible passengers.

Costs of Custody and Care of Inadmissible Persons

Custody and care costs, including accommodation, meals, welfare support, translation services, and other ancillary costs, are among the most significant financial burdens associated with the management of inadmissible passengers (INADs). Except for a limited number of jurisdictions where authorities provide accommodation or holding facilities at airports without charge, airlines typically bear at least part of these costs.

Under Standard 5.9, an aircraft operator is responsible for the costs of custody and care only when a passenger is found inadmissible because they are improperly documented, as defined in ICAO Annex 9 - Facilitation. This provision must be read by Standard 3.35, which requires aircraft operators to take necessary precautions at the point of embarkation to ensure passengers have the required travel documents. Where a traveller is determined to be improperly documented despite these checks, the passenger may be returned to the aircraft operator for removal, and the operator is responsible for making the necessary arrangements until departure from the State.

Standard 5.9.1 clarifies that the State bears responsibility for custody and care costs in all other categories of inadmissibility. This includes situations where:

- the passenger is found inadmissible due to document deficiencies that could not reasonably have been detected by the aircraft operator, provided the operator complied with the necessary precautions required under Standard 3.35; and
- the passenger is denied admission for any reason other than being improperly documented.

In such circumstances, the State is responsible for detention, accommodation, and maintenance costs until the aircraft operator removes the passenger.

The study identified a notable divergence between the cost allocation principles set out in ICAO Annex 9 - Facilitation and their implementation in practice. ICAO Annex 9 clearly distinguishes between improperly documented persons and other categories of inadmissible passengers. Under Standard 5.9, the aircraft operator is responsible for the custody and care of improperly documented passengers. However, Standard 5.9.1 places responsibility on the State for the custody and care of all other categories of inadmissible passengers, including those denied entry for reasons beyond the aircraft operator's expertise or for reasons unrelated to document deficiencies.

Evidence from regulatory review, airline survey, and stakeholder interviews suggests that this distinction is often absent from both national legislation and operational practice. In some jurisdictions, domestic legal frameworks have not fully reflected the principles in Standard 5.9.1. In other countries, airlines are held financially responsible for custody and care costs regardless of the grounds for determining inadmissibility. Survey results indicate that airlines incur at least some of these costs in more than 90% of reported INAD cases, in addition to removal transportation costs.

This includes cases resulting from intelligence-led or security-related refusal decisions, sophisticated document fraud that airline personnel could not reasonably have detected, protection-related claims, and other circumstances that extend beyond the traditional concept of improper documentation at check-in. Airlines also reported lengthy and costly cases involving asylum seekers and other protection-related situations, where extended stays and associated custody and care

expenses were driven primarily by State processing timelines rather than any action or omission by the carrier.

One airline described a case involving a non-cooperative passenger who destroyed his travel documents and repeatedly refused repatriation. Limited cooperation from the relevant embassy delayed the removal process for six months. During that period, the inadmissible person remained in State custody, yet the airline was charged approximately EUR 300 per day for custody and care, in addition to a substantial fine for alleged documentation deficiencies. The carrier's total cost approached EUR 60,000.

Responses from State authorities suggest that governments are more likely to assume or share custody and care costs in cases involving national security concerns, public order issues, human trafficking, irregular migration, or other circumstances that are clearly beyond the airline's control, broadly reflecting the principles established in ICAO Annex 9. However, the study also found limited transparency regarding cost-sharing arrangements. Of the twenty-two jurisdictions that participated in the survey, only two provided detailed information on the costs associated with managing inadmissible passengers.

Interviews further indicated that State participation in custody and care arrangements generally occurs only under specific conditions. These include situations where suitable facilities exist within the sterile restricted area (SRA) of the airport, or where responsibility formally transfers to the State following the submission of an asylum or other protection claim. Even in such circumstances, airlines often still incur significant expenses, including meals, interpretation services, security escorts, and hotel accommodation for women, children, or other vulnerable individuals when local regulations prevent their accommodation in standard airport holding facilities.

Overall, the findings suggest that the cost-sharing principles established by ICAO Annex 9 are not consistently applied in practice. While ICAO Annex 9 envisages a differentiated allocation of responsibility based on the reasons for inadmissibility, airlines frequently bear substantial custody and care costs even in cases arising from State decisions, security assessments, protection claims, or other factors that fall outside the carrier's reasonable control. As a result, State involvement may reduce the financial burden in certain circumstances, but it rarely eliminates it altogether.

Security Escorts

Security escort requirements are another major cost associated with removing inadmissible passengers. According to the airline survey, some carriers reported escort-related expenses of up to USD 25,000 for a single case. The study found that once authorities determine an escort is required, airlines are generally expected to either pay for government-provided escorts or arrange private security services. When airlines use private escorts, they must cover not only professional service fees but also associated travel, accommodation, and subsistence expenses, often for two or more escort personnel. These costs can be particularly high in regions where airlines must deploy suitable escorts from another country.

Several airlines reported that government-provided escort services are frequently more expensive than private alternatives. Only one carrier described a cooperative arrangement under which the State provided escorts without charge and the airline was responsible solely for transportation and accommodation expenses.

Chapter 7. Prevention of Inadmissible Passengers

Preventing inadmissible passengers is a key objective of ICAO Annex 9 Chapter 5. ICAO Annex 9 establishes a framework of shared responsibilities between States and aircraft operators to prevent the carriage of improperly documented passengers while facilitating legitimate travel. In particular, Standard 3.35 requires aircraft operators to take necessary precautions at embarkation to ensure passengers hold the travel documents required for entry or transit. At the same time, Annex 9 encourages States to provide timely and accurate information, implement appropriate border management systems, and cooperate with stakeholders to support informed pre-departure decisions.

Interview findings indicate that preventing inadmissible passengers is most effective when airlines have access to reliable verification tools, direct communication with competent authorities, and efficient mechanisms for resolving admissibility-related issues before departure. Without these elements, airlines face greater difficulty identifying risks and taking appropriate preventive action.

The interviews also revealed substantial differences among jurisdictions in cooperation, information sharing, and digital maturity. Although digital tools and systems can strengthen airline processes, they are not always effective. This is especially clear when automated systems depend heavily on passenger-provided information, limiting airlines' ability to verify travel eligibility independently during initial screening. Likewise, when State-operated border management systems lack adequate capacity, interoperability, or functionality, opportunities for timely intervention may be limited.

Cooperation and Communication with Competent Authorities

The study findings indicate that effective communication between airlines and State authorities is critical to preventing inadmissibility. Airlines with direct contact points—such as immigration services, border police, consulates, or Immigration Liaison Officers (ILOs)—generally report better preventive outcomes. Several airlines said they could escalate doubtful cases in real time, verify potentially fraudulent documents, and clarify unclear travel intentions before boarding. One authority identified proactive engagement by airlines, especially when cases are uncertain, as one of the most effective ways to strengthen cooperation and prevent inadmissibility.

Some authorities have also implemented targeted operational measures. One authority described an ad hoc system applied to selected high-risk routes associated with visa fraud or irregular migration. Although that jurisdiction had not yet implemented interactive Advance Passenger Information (iAPI), the system enabled airline personnel to verify visa and passport details directly with the authority and obtain real-time confirmation of admissibility before departure. Interviewees noted, however, that such arrangements are resource-intensive and therefore difficult to scale across broader networks.

From both airline and government perspectives, Immigration Liaison Officers (ILOs) emerged as one of the most effective preventive mechanisms. Airlines emphasized their value in cases involving higher-risk passenger profiles, unclear travel intent, document fraud, or route-specific migration patterns. Consistent with the facilitation objectives of ICAO Annex 9, ILOs often provide dedicated

contact channels, issue operational alerts, conduct route-based awareness initiatives, and may deliver specialized training on document fraud detection and entry requirements. One authority confirmed that ILOs deployed abroad play a critical role in preventing the carriage of improperly documented passengers and in supporting airlines through targeted training on document verification and border entry requirements. Interview evidence further suggests that ILOs are particularly valuable in situations where prevention depends on access to State-held information or assessments that fall outside the airline's mandate.

At the same time, practices vary considerably across jurisdictions. Some airlines, particularly those operating in more complex regulatory environments, reported the absence of structured platforms for regular consultation or coordination with authorities. In such cases, communication between airlines and authorities is often informal and dependent on personal relationships. Airlines also noted that exchanges with authorities can be largely one-directional: no-board instructions may be issued without explanation, and post-arrival inadmissibility notifications may omit the underlying grounds for refusal. As noted elsewhere in this report, this lack of transparency limits airlines' ability to identify trends, refine preventive measures, and distinguish documentation-related issues from broader immigration or security considerations.

The findings also highlight the challenge posed by rapidly evolving entry requirements. A notable proportion of surveyed airlines (11 out of 49) identified sudden regulatory changes as a primary uncontrollable cause of inadmissibility. Experiences during the COVID-19 pandemic underscored the importance of timely information sharing, dedicated communication channels, and regularly updated digital systems, particularly when entry requirements change more quickly than traditional guidance tools can be updated.

Preventive Tools, Passenger Data Programs and Digital Maturity

Airlines consistently highlighted the importance of real-time TIMATIC queries integrated into Departure Control Systems (DCSs). These tools enable check-in personnel to identify missing or inconsistent documentary requirements before passengers are cleared up for travel. Several airlines also reported using machine-readable zone (MRZ) readers, passport scanners, and automated document validation systems, including online check-in. Such technologies can detect basic anomalies, including expired documents, incomplete data fields, and inconsistencies between passenger-provided information and travel documents. Airlines reported the strongest outcomes where these tools were supported by clear escalation procedures and trained airline personnel.

Interviewees also highlighted the value of Advance Passenger Information (API), digital visa verification systems, and internal fraud-awareness programs. Some airlines reported direct access to digital visa records during check-in, while others emphasized that electronic travel authorization (eTA) regimes can reduce documentation errors and lower inadmissibility rates. The report also noted more advanced technologies, such as automated document readers and enhanced verification tools, though deployment remained limited to specific carriers, routes, or airports.

Consistent with earlier findings, the effectiveness of digital tools depends significantly on the nature of the risk of inadmissibility involved. While these tools generally prevent routine documentation errors, they are less effective in cases involving undeclared or fraudulent travel intent, irregular migration, or sophisticated forms of fraud. Passengers may present formally valid documents for purposes other than those declared or use forged documents incorporating genuine data elements. Interviewees therefore stressed that digital tools should not be viewed as substitutes for State assessment but rather as an additional layer of control that is most effective when combined with support from competent authorities. Several airlines also noted that digital travel authorization systems are not always supported by reliable, carrier-facing verification channels. In some jurisdictions, eTA systems have been introduced without integration into iAPI, authority-to-carry frameworks, or equivalent verification mechanisms. In such circumstances, airline staff must rely on visual or procedural checks rather than obtaining confirmation from an authoritative source.

The findings also highlighted the potential value of carrier checks under the European Travel Information and Authorisation System (ETIAS) and the Entry/Exit System (EES). These systems enable carriers to verify whether visa-exempt travellers hold a valid ETIAS authorisation and whether certain visas remain valid for travel. However, they do not yet address all operational challenges. For example, carrier interfaces do not calculate a traveller's remaining authorised period of stay under the Schengen 90/180-day rule. Consequently, airlines cannot determine whether a passenger has exceeded their lawful stay, and this aspect of the admissibility assessment continues to depend on border authority records and judgement.

Interactive Advance Passenger Information (iAPI), which is encouraged through ICAO Annex 9 Chapter 9 provisions on passenger data exchange, was consistently identified as one of the most effective tools for preventing inadmissible passenger movements at origin. Airlines with operational experience in jurisdictions such as the United States, Australia, and the United Kingdom generally reported positive outcomes. Pre-departure board/no-board messages were viewed as particularly effective in preventing inadmissible passengers from travelling.

Nevertheless, airlines and authorities alike emphasized that iAPI requires significant State capability. Several authorities indicated that limited resources and digital infrastructure constrain implementation. Others pointed to challenges related to cost, system integration, and operational readiness.

Interviewees also highlighted practical limitations. Some iAPI systems provide conditional boarding responses, leaving the final decision to airline personnel and reducing some of the system's preventive benefits. Participants also stressed that iAPI is not a complete solution: although highly effective, it does not replace border authority decision-making, structured communication channels, ILO support, or other forms of government intervention. Several airlines also reported continued exposure to penalties in iAPI environments when passengers cleared before departure were later refused entry for reasons that were not apparent at the point of origin.

Digitalization: Benefits, Limitations, and Emerging Risks

A consistent theme throughout the interviews was that automation and digitalization can significantly strengthen prevention efforts but may also introduce new vulnerabilities. One concern relates to the growing reliance on self-service processes, including online check-in and kiosk-based data entry. Where passengers enter their own information, opportunities for review by trained airline staff are reduced. If systems are not fully integrated with document verification tools, government databases, or carrier-facing validation mechanisms, errors or inconsistencies may go undetected until later stages of the journey.

Accordingly, the challenge lies not in digitalization itself, but in digitalization that is implemented without adequate verification capabilities or robust integration with State systems.

Overall, the findings indicate that effective inadmissibility prevention depends on the effective functioning of three elements: 1) reliable airline verification tools, 2) responsive and transparent communication from State authorities, and 3) sufficiently mature digital interfaces that connect both sides. TIMATIC remains the most widely used baseline tool, while systems such as iAPI can substantially reduce inadmissibility when properly implemented. However, complementary mechanisms, including Immigration Liaison Officers (ILO), real-time document verification, direct communication channels, and targeted training, remain essential, particularly where prevention depends on access to State-held information or the exercise of sovereign authority.

The evidence also underscores that digitalization should not be interpreted as a transfer of responsibility for admissibility determinations from States to airlines. Consistent with ICAO Annex 9, the ultimate decision regarding admission to a State remains a sovereign function exercised by border authorities. Digital tools should therefore be viewed as a means of strengthening prevention within a framework of shared responsibility, cooperation, and information exchange between States and aircraft operators.

Chapter 8 Evidence-Based Recommendations

System Context and Policy Direction

Inadmissibility management should not be viewed solely as an airline compliance issue. In line with ICAO Annex 9, it is part of a broader facilitation and border management ecosystem that includes States, competent authorities, aircraft operators, airports, ground handlers, technology providers, and passengers. Preventing and managing inadmissible passengers effectively therefore requires shared responsibility and cooperation among all stakeholders. External factors—including geopolitical developments, migration dynamics, economic conditions, and demographic trends—also shape inadmissibility and may affect passenger flows, documentation risks, protection claims, and fraud patterns.

In this context, IATA recommends that national frameworks clearly distinguish between inadmissibility resulting from an aircraft operator's failure to take the necessary precautions set out in ICAO Annex 9 and inadmissibility resulting from circumstances beyond the operator's reasonable control. ICAO Annex 9 defines necessary precautions as the measures aircraft operators are expected to take to ensure passengers hold the travel documents required by transit and destination States. This principle appears throughout Chapter 5 of ICAO Annex 9 - Facilitation, including Standard 5.14, and provides the basis for distinguishing between inadmissibility caused by deficiencies in document verification and inadmissibility arising from factors that could not reasonably have been identified before departure.

Circumstances beyond the aircraft operator's reasonable control may include:

- Passenger fraud or misrepresentation;
- Forged or altered documents that cannot reasonably be detected through document verification procedures;
- Refusals of entry resulting from competent authorities' discretionary assessments of immigration, security, intelligence, public order, or public policy matters;
- Last-minute changes to entry, transit, visa, or travel authorization requirements;
- Inaccurate, inconsistent, incomplete, or outdated information in government-operated immigration, visa, or travel authorization systems;
- Differences in how competent authorities interpret or apply entry requirements at the border; and
- Visa or travel authorization systems that do not enable aircraft operators to conduct reliable, accessible, real-time verification.

Strategic Policy Shift

Based on these findings, policy responses should evolve beyond a primary focus on sanctions and cost recovery from aircraft operators toward a more balanced, risk-based, and cooperative framework aligned with ICAO Annex 9 Standards and Recommended Practices (SARPs).

Such a framework should recognize the shared responsibilities of States, competent authorities, and aircraft operators, while placing greater emphasis on prevention. This includes facilitating timely access to competent authorities before departure, ensuring accurate and up-to-date entry requirements, strengthening government information-sharing mechanisms, and promoting structured cooperation between authorities and airlines.

In parallel, the framework should support the development and implementation of reliable digital verification tools for travel documents, visas, travel authorizations, and other non-standardized entry requirements, including through interoperable travel platforms and carrier-facing verification systems. These tools should enhance aircraft operators' ability to take the necessary precautions envisaged by ICAO Annex 9, while recognising that admissibility determinations ultimately remain the responsibility of States.

Compliance regimes and cost-allocation mechanisms should be proportionate, transparent, and supported by appropriate legal and operational safeguards. Building on principles reflected in ICAO Annex 9 Standards 5.9, 5.9.1 and 5.14, compliance regimes and cost-allocation mechanisms should avoid imposing liability on aircraft operators for circumstances that could not reasonably have been prevented through the necessary precautions required under the Annex.

Finally, the establishment of clear procedures for timely notification, coordinated removal processes, and structured cooperation mechanisms, such as Memoranda of Understanding (MoUs) or agreed operational protocols, would help reduce disputes, minimize operational disruption, improve compliance outcomes, and mitigate avoidable costs for all parties involved.

Predictable and Proportional Compliance Frameworks

The study indicates that, in several jurisdictions, carriers face penalties automatically once a passenger is deemed inadmissible, without sufficient consideration of the case's specific circumstances or the carrier's conduct. Airlines also reported that penalties and administrative charges vary considerably across jurisdictions, creating unpredictability in financial exposure and, in some cases, undermining trust between carriers and authorities.

A more ICAO Annex 9-aligned approach would ensure that aircraft operators are not held liable where they have exercised the necessary precautions required under ICAO Annex 9, including the document verification obligations and acted in good faith.

Compliance frameworks should therefore be fair and predictable, and should be tied directly to actions that aircraft operators can reasonably control. Consistent with ICAO Annex 9 Standards 3.35 and 5.14, assessments should consider whether operators took the necessary precautions required under the Annex, including checking the necessary travel documents, authorizations, and transit requirements using information reasonably available at departure. In this context, compliance frameworks should include:

- Clear standards of aircraft operator diligence, specifying the expected level of checks for travel documents, travel authorizations, and transit requirements at key stages of the

passenger journey, including booking, online or airport check-in, transfer, and boarding, as applicable.

- Defined evidence of due diligence, identifying the records that may demonstrate compliance. These may include TIMATIC or equivalent verification checks, and interactive Advance Passenger Information (iAPI) transmission records, visa or travel authorization verification results, supervisor escalation notes, and other documentation demonstrating that appropriate checks were conducted based on the information available at the time of check-in and/or boarding.
- Explicit grounds for mitigation or defence, applicable where aircraft operators have followed established procedures, made appropriate use of available verification systems, escalated complex cases where necessary, and demonstrated that the necessary precautions were exercised.
- Exemptions or mitigation for circumstances beyond the aircraft operator's reasonable control, including sophisticated fraud not reasonably detectable through normal document verification procedures, inconsistent or unavailable government data, sudden or partial changes to entry requirements, or failures in State-operated visa, travel authorization, immigration, or border management systems.
- Transparent and proportionate penalty frameworks, with clearly defined criteria for assessing the nature and severity of any breach, the conduct of the aircraft operator, recurrence, mitigating factors, and the extent to which the inadmissibility could reasonably have been prevented through the exercise of necessary precautions.
- Accessible review and appeal procedures, enabling aircraft operators to contest penalties or cost claims, submit supporting evidence, request reconsideration, and receive reasoned decisions from the competent authority.
- Accreditation or trusted-operator programmes, allowing competent authorities to recognize aircraft operators with robust compliance systems, including training, document verification procedures, escalation processes, and reporting mechanisms, and providing corresponding reductions in enforcement exposure where agreed standards are met.
- Safeguards against disproportionate cumulative charges, including the avoidance of layered penalties, such as late-removal fees, administrative charges, and related costs, that are excessive in relation to the conduct of the aircraft operator and the circumstances of the case.
- Use of corrective measures where appropriate, particularly in cases involving first-time, isolated, or non-systemic issues, where targeted training, procedural improvements, or remedial actions may be more effective than the automatic imposition of financial penalties.

Liability Safeguards for Removal-Related Costs

A recurring challenge identified by airlines is their exposure to costs associated with the custody, care, and removal of passengers deemed inadmissible. These costs may include accommodation, meals, supervision, translation services, medical care, security escorts, and other expenses arising from prolonged stays or delays in the removal process.

While ICAO Annex 9 recognizes that aircraft operators have certain responsibilities in relation to the removal of inadmissible passengers, such responsibilities should not result in unlimited or

disproportionate financial exposure, particularly where inadmissibility arises from circumstances beyond the operator's reasonable control. This approach is consistent with ICAO Annex 9 Standards 5.9, 5.9.1, and 5.14, which distinguish between improperly documented passengers and other categories of inadmissibility and recognize the importance of assessing whether the aircraft operator exercised the necessary precautions required under the Annex.

Liability for custody, care, and removal costs should therefore be linked to the extent to which the aircraft operator could reasonably have prevented inadmissibility by exercising those necessary precautions. Liability frameworks that impose costs on aircraft operators irrespective of fault, knowledge, or reasonable ability to detect the underlying inadmissibility factors risk undermining the distinction established by ICAO Annex 9 between improperly documented passengers and other categories of inadmissibility.

In this context, States should ensure that liability is allocated in a balanced and proportionate manner, rather than assigning sole responsibility to aircraft operators for costs resulting from removal delays or extended passenger stays linked to State actions, decisions, or procedures. This includes situations arising from activities undertaken by immigration authorities, border control authorities, courts, consular authorities, or other governmental bodies.

Where aircraft operators are required to contribute to removal-related costs, such costs should be clearly defined, reasonable, evidence-based, and limited to situations in which the operator had a meaningful opportunity to prevent the inadmissibility or mitigate the resulting costs. To support this approach, States should establish explicit legal and operational safeguards limiting aircraft operator exposure in the following circumstances:

- Delayed or incomplete notification, where the aircraft operator is not promptly informed of the inadmissibility decision or does not receive sufficient information to plan removal effectively, including routing options, documentation requirements, escort arrangements, or special handling instructions.
- Protection and asylum procedures or other administrative processes, including immigration reviews, court proceedings, appeals, or State-led processes that suspend removal or prolong custody, resulting in additional costs outside the aircraft operator's reasonable control.
- Prolonged detention resulting from documentation or inter-State coordination issues, including cases requiring replacement travel documents, cover letters, identity verification, consular engagement, transit authorization, or formal acceptance by receiving or transit States before removal can proceed.
- Delays resulting from security, behavioural, or medical considerations, including cases requiring intervention by competent authorities, medical clearance, the arrangement of security escorts, or situations where the pilot-in-command refuses carriage or offloads a passenger on justified safety or security grounds.
- Cases involving apparently compliant passengers at departure, where passengers present valid travel documents and authorizations at the point of embarkation but are subsequently refused entry based on discretionary immigration, security, intelligence, public order, or

public policy assessments that could not reasonably have been identified or verified by the aircraft operator prior to departure.

- Situations involving inadequate, unavailable, or unreliable official information, including unclear or contradictory government guidance, last-minute regulatory changes, inaccurate or outdated State-operated systems, or the absence of reliable real-time verification mechanisms for visas, travel authorizations, or other entry requirements.

Consideration should be given to avoiding legal frameworks that impose automatic, strict, or risk-based liability on aircraft operators for custody, care, or removal costs in circumstances beyond their expertise, visibility, knowledge, or reasonable control. Such approaches may be difficult to reconcile with the principles reflected in ICAO Annex 9, including the distinction between circumstances that could reasonably have been prevented through necessary precautions and those that depend on information, assessments, or decisions available only to competent authorities.

Regarding security escorts, States should ensure that escort requirements are based on documented risk assessments and that associated costs are allocated proportionately. Where competent authorities determine that escorts are required for security, behavioral, public order, or public safety reasons, consideration should be given to providing official escorts, such as police or border control officers, without imposing additional service charges on the aircraft operator. Official escorts may enhance safety and operational effectiveness, particularly in higher-risk removals, by ensuring personnel have an appropriate public authority mandate and can coordinate directly with relevant agencies throughout the removal process.

Facilitation of Removals and Assessment of Operational Feasibility

While carriers may have responsibilities for removing inadmissible passengers, border control authorities play a critical role in ensuring removal processes are operationally feasible, proportionate, and aligned with ICAO Annex 9 Standards and Recommended Practices (SARPs), as well as applicable international protection, refugee, and human rights obligations. Consistent with ICAO Annex 9 Standards 5.4 and 5.11, competent authorities should consult with aircraft operators on removal arrangements and operational feasibility, including removal destinations, routing options, and timing requirements.

The study findings indicate that removal costs and operational complexity can vary significantly depending on the destination and routing authorities determine. This is particularly evident in cases requiring interline arrangements, multi-leg itineraries, security escorts, or, in exceptional circumstances, dedicated removal flights. Airlines also reported that requirements for immediate removal, especially those involving prescribed routing or holding aircraft on the ground to facilitate same-aircraft return, can cause significant operational disruption and commercial impact.

In this context, policy frameworks should ensure that border control authorities:

- Consult with carriers on operational feasibility, taking into account factors such as flight and seat availability, aircraft turnaround constraints, transit restrictions, travel documentation requirements, and overall flight safety considerations.

- Avoid disproportionately disruptive or costly removal practices, including aircraft holding or imposing a specific routing or destination, unless such measures are strictly necessary, legally justified, and operationally viable.
- Consider the broader operational and commercial impact, including the potential need to use third-party carriers, displacement of revenue passengers, crew duty limitations, slot constraints, missed onward connections, costs associated with security escorts, and wider network disruption.
- Provide timely, clear, and written removal instructions, including the designated destination and routing, realistic timelines based on the complexity of the case, required travel or transit documentation, and any escort requirements.

In addition, States may wish to consider, consistent with facilitation principles, introducing or clarifying requirements that certain categories of passengers should hold a return or onward ticket as a condition of entry. This may be particularly relevant for short-stay visitors, visa-exempt travellers, or other passengers whose admissibility depends on demonstrating temporary stay and intent to depart. Clearly defined requirements, including applicable passenger categories, exemptions, and acceptable forms of proof (e.g., confirmed, flexible, or refundable bookings), may help reduce disputes and limit carriers' exposure when passengers are refused entry without the means to depart.

Finally, authorities should give due weight to the pilot-in-command's (PIC) safety and security determinations. Where a PIC refuses carriage or offloads an inadmissible passenger on justified safety or security grounds, airlines should not be required to proceed with removal on that flight. Instead, removal should be reassessed with appropriate safeguards in place, which may include additional risk assessment, involvement of competent authorities, medical clearance, escorts, or alternative routing arrangements.

Airport Facilities for Temporary Holding and Care of INADs

Border control authorities should, in coordination with airport operators, ensure the availability of appropriate facilities within the secured restricted area (SRA) or other designated controlled areas at international airports to accommodate passengers awaiting an inadmissibility decision or removal. The absence of such facilities can create pressure for immediate or same-aircraft removal even when removal is not operationally feasible, required documentation or transit arrangements remain unresolved, or the pilot-in-command has raised safety and security concerns.

Adequate holding facilities therefore serve as an essential safeguard against rushed, unsafe, or disproportionate removal practices, while supporting orderly and coordinated processing.

Policy frameworks should accordingly promote:

- Dedicated temporary holding facilities, located within the SRA or another suitable controlled area, enabling the safe and secure accommodation of inadmissible passengers while admissibility assessments or removal arrangements are finalized.

- Minimum standards of care and welfare, including access to food, water, sanitation, medical assistance, and interpretation services where necessary, as well as treatment consistent with dignity and applicable human rights standards.
- Clear allocation of responsibilities, defining which entity is responsible for supervision, welfare, security, and cost-sharing while the passenger remains in holding pending removal.
- Tailored procedures for vulnerable or complex cases, including unaccompanied minors, families, persons requiring medical support, individuals with disabilities or reduced mobility, asylum or protection claimants, and passengers presenting behavioural or security concerns.

Cooperation Between States on Removals

The study indicates that effective case management and timely removal of inadmissible passengers often depend on coordinated action among multiple States and competent authorities. Complex cases may involve the State of embarkation, transit States, the State of nationality or residence of the passenger, consular authorities, and receiving authorities. Removal processes become particularly challenging when passengers lack valid travel documents, require replacement or temporary documentation (such as cover letters, emergency travel documents, or laissez-passer), are subject to transit restrictions, or where acceptance for return or onward movement remains unresolved.

In such circumstances, delays and associated costs frequently arise from inter-State coordination challenges rather than from the actions of the aircraft operator. Consistent with ICAO Annex 9, the effective management of inadmissible passengers requires timely cooperation among States and competent authorities in matters that involve sovereign decision-making, including identity and nationality verification, re-documentation, consular approvals, acceptance by receiving States, and transit authorizations.

In particular, ICAO Annex 9 Standard 5.1 provides that States should communicate and cooperate in resolving inadmissibility cases promptly. Effective implementation of this standard can help prevent unresolved inter-State disagreements from resulting in prolonged custody, delayed removals, repeated transfers of inadmissible passengers between States, or disproportionate operational and financial burdens on aircraft operators.

Policy frameworks should therefore support:

- Coordination among relevant competent authorities, including consulates, transit States, receiving States, and other relevant authorities, in cases requiring confirmation of identity, nationality, admissibility, re-documentation, transit authorization, or formal acceptance for return.
- Examination and resolution procedures involving the State of embarkation, where appropriate and consistent with ICAO Annex 9 Standards and Recommended Practices (SARPs), while avoiding situations in which inadmissible passengers are repeatedly transferred between States without a timely resolution of their status.

- Facilitation of transit for removal purposes, where consistent with applicable national legislation and where the aircraft operator has complied with relevant legal and operational requirements.
- Operationally realistic notification and return procedures, including adequate advance-notification periods, reasonable removal timelines, and consideration of operational feasibility when establishing documentation or removal requirements.
- Recognition and acceptance of alternative documentation, including cover letters, emergency travel documents, laissez-passer, and other official supporting documents, based on clear, transparent, and harmonized requirements regarding their content and format.
- Provision of case-specific guidance to aircraft operators, including information on documentation requirements, transit arrangements, escorts, assurances, or authorizations required to facilitate removal, particularly where identity, nationality, or documentation issues remain unresolved.
- Direct communication, information-sharing, and escalation channels between competent authorities, enabling the timely resolution of cases involving missing documentation, disputed nationality, protection claims, transit refusals, return refusals, and advance-notification requirements, particularly where certain information cannot be disclosed to the aircraft operator because of legal, privacy, security, or law-enforcement constraints.

Overall, greater cooperation among States and competent authorities would support more efficient removals, reduce avoidable delays and costs, and promote implementation of the facilitation principles reflected in ICAO Annex 9, while ensuring that responsibilities remain aligned with the respective roles of States and aircraft operators.

Removal Notifications to Airlines

The study highlighted that airlines often have limited visibility when a passenger is declared inadmissible. Competent authorities tend to provide more detailed information when the airline is considered responsible for the inadmissibility; in other cases, airlines may receive only a basic notification of the decision and the requirement to arrange the passenger's removal. At the same time, States may have legitimate grounds to restrict disclosure, particularly in cases involving national security, intelligence, law enforcement, privacy, data protection, or other legally protected information.

Timely and sufficiently detailed notifications are nevertheless essential to support the consultation, coordination, and removal processes envisaged under ICAO Annex 9 and to enable aircraft operators to comply effectively with their removal-related responsibilities. Such notifications also support broader operational objectives, including trend analysis, the development of targeted preventive measures, the preservation of relevant evidence, and the assessment of liability and cost allocation. Importantly, appropriate transparency helps airlines distinguish between cases involving improperly documented passengers and those arising from factors beyond their reasonable control or from decisions taken exclusively by competent authorities.

Policy frameworks should therefore establish clear notification procedures, ensuring that airlines receive relevant operational information to the extent necessary, proportionate, and permitted under applicable laws and regulations. Such procedures should include:

- Formal notification of inadmissibility, including the minimum operational information necessary to identify the passenger and facilitate removal, such as the originating flight, the time of the decision, and the responsible competent authority. Notifications should also include removal instructions, where applicable, covering routing, escort requirements, expected timelines, documentation requirements, and any specific handling considerations.
- • Information about the grounds for inadmissibility, to the extent it may be disclosed under applicable legal, privacy, data protection, security, or law-enforcement frameworks. This may include documentation of deficiencies; visa or travel authorization issues; immigration history; suspected fraud; or other relevant grounds. If full disclosure is not possible, competent authorities should, where feasible, provide a standardized refusal category, a non-sensitive explanation, or an indication that legal restrictions prevent disclosure of specific information.
- Clarification of the basis for aircraft operator responsibility, where relevant and appropriate, including whether the passenger is considered improperly documented due to a failure to exercise the necessary precautions required under ICAO Annex 9 Standards 5.14 and 3.35, or whether the refusal of entry is based on information, assessments, or circumstances that could not reasonably have been identified or verified by the aircraft operator at the point of departure.
- Application of data-minimization principles, ensuring that any personal information shared with airlines is limited to what is necessary to facilitate removal, meet operational requirements, assess potential liability, and comply with applicable legal obligations.
- Appropriate safeguards for sensitive information, recognizing that information related to national security, intelligence, criminal investigations, protection claims, or other legally sensitive matters may require restricted handling or may not be disclosable to airlines.

These notification procedures would promote transparency, enable efficient removal arrangements, and support the fair allocation of responsibilities in line with ICAO Annex 9 Standards 5.9, 5.9.1, and 5.14, while respecting applicable privacy, data protection, security, and law-enforcement requirements.

State Support and Cooperation at Origin

The study indicates that effectively preventing inadmissible passengers depends significantly on structured cooperation and information sharing before travel. Consistent with the objectives of ICAO Annex 9, States and industry share a common interest in preventing the carriage of improperly documented passengers while facilitating the smooth movement of legitimate travellers.

While cooperation between governments and aircraft operators is a critical component of this effort, ICAO Annex 9 Standard 3.33 also recognizes the responsibility of States to assist carriers in identifying and preventing the transport of improperly documented passengers to deter fraud and abuse. Strengthening and further detailing these obligations would help establish a more

comprehensive and effective framework for preventing inadmissibility. Such cooperation should extend beyond the traditional government-carrier relationship to include broader collaboration among border agencies, airlines, airports, and other stakeholders involved in the travel process. This would create a balance between a clearer framework and one that is not overly prescriptive.

Immigration Liaison Officers (ILOs), equivalent support mechanisms provided by competent authorities, and joint awareness and training initiatives emerged as some of the most effective tools for preventing inadmissibility. Where available, these mechanisms assist airlines in clarifying ambiguous visa or travel authorization requirements, identifying fraud patterns and irregular migration risks, and understanding local border procedures and evolving entry requirements before boarding decisions are finalized.

Their role is not to transfer responsibility for admissibility determinations from States to aircraft operators, but rather to provide authoritative support that enables airlines to make informed decisions based on the best information available at the time of departure. Such support helps aircraft operators exercise the necessary precautions envisaged under ICAO Annex 9 Standard 3.35 and reflected in Standard 5.14, while recognizing that admissibility determinations ultimately remain the responsibility of competent authorities.

States and competent authorities should therefore strengthen preventive information exchange with airlines through structured, reliable, and accessible mechanisms, in accordance with applicable privacy and data protection requirements. These should include:

- The presence of Immigration Liaison Officers (ILOs) or equivalent support functions, particularly on high-risk routes, at high-traffic airports, or in jurisdictions facing recurrent challenges related to documentation, visa compliance, fraud, or migration dynamics, in order to provide authoritative advisory support to es.
- Dedicated contact points and escalation channels, such as hotlines, operational email addresses, or 24/7 coordination desks, enabling airlines to obtain timely clarification from competent authorities on complex or urgent cases prior to boarding.
- Regular joint training, awareness initiatives, and feedback mechanisms, informed by operational data and emerging trends. These may include recurring causes of inadmissibility, route-specific risks, fraud and irregular migration patterns, removal-related challenges, information gaps, regulatory developments, compliance practices, and lessons learned from past cases.
- Passenger awareness campaigns to improve communication about entry, transit, visa, travel authorization, and onward or return travel requirements before departure.

Interoperable Digital Tools and Effective Data Sharing

The study shows that the aviation industry increasingly relies on digital tools, including TIMATIC queries integrated into Departure Control Systems (DCSs), automated document verification tools, passport scanners, machine-readable zone (MRZ) readers, Advance Passenger Information (API) systems, interactive Advance Passenger Information (iAPI) systems, digital visa records, and electronic travel authorisation systems. These tools are particularly effective at detecting routine

documentation issues, such as expired documents, missing data fields, and inconsistencies between passenger-entered information and travel documents.

These findings align with ICAO Annex 9, particularly Chapter 9, which promotes implementing Advance Passenger Information (API) and interactive Advance Passenger Information (iAPI) systems to strengthen border integrity, facilitate passenger processing, enhance security, and reduce the movement of inadmissible passengers. Such systems complement the obligations of aircraft operators under Standard 3.35 by supporting document and travel authorization verification prior to departure.

Digitalization can significantly strengthen efforts to prevent inadmissible passengers, but its effectiveness depends on the standardisation, interoperability, reliability, accuracy, and overall maturity of airline and State-operated systems. Airlines cannot effectively prevent inadmissibility without clear, authoritative, standardized, and timely information about entry, transit, visa, documentation, and travel authorization requirements. If this information is unclear, unavailable, outdated, or not shared in a way that supports operational decision-making at the point of departure, digital tools have limited preventive value.

The study further confirms that digital tools do not replace the need for State assessment, border control decision-making, or direct support from competent authorities, particularly in complex cases involving information unavailable to airlines. Consistent with ICAO Annex 9 Standards 3.35 and 5.14, these tools should be viewed as mechanisms that support aircraft operators in exercising the necessary precautions required under the Annex, rather than as substitutes for competent authority functions or sovereign admissibility determinations.

In addition, continued support from competent authorities provides important fallback mechanisms when digital systems are unavailable, delayed, incomplete, or produce inconclusive results.

Considering these findings, policy frameworks should support:

- Timely communication of regulatory changes, including changes to visa, travel authorization, documentation, transit, and entry requirements, as well as nationality-specific or route-specific restrictions.
- Authoritative and operationally accessible information through reliable channels and, where possible, in machine-readable formats that can be integrated into airline systems and travel requirements databases.
- Enhanced State-side digital capacity, including investments in infrastructure, data quality, system availability, staffing, and real-time response capabilities necessary to support effective API, iAPI, and authority-to-carry programmes.
- Authoritative verification channels enabling airlines to validate visas, travel authorizations (including eVisas and eTAs), residence permits, transit authorizations, and other relevant documentation, and to obtain reliable board/no-board instructions from competent authorities.
- Interoperability with airline operational systems, including DCS platforms, online check-in tools, self-service kiosks, document readers, and travel requirements databases.

- Recognition of the limitations of digital systems and establishment of appropriate liability safeguards. These safeguards should align with ICAO Annex 9 Standards 5.9, 5.9.1, and 5.14, acknowledging that airlines may have only partial visibility into a passenger's admissibility status and should not be held responsible for information, assessments, or decisions that are not reasonably accessible at the point of departure.
- Passenger-facing digital travel portals, including web and mobile platforms, to enable travellers to demonstrate compliance directly to competent authorities before travel. These portals may reduce uncertainty, improve compliance, and streamline pre-departure verification, especially when requirements vary by country and are not governed by internationally harmonized standards.

Memoranda of Understanding and Similar Arrangements

Memoranda of Understanding (MoUs), compliance mechanisms, accreditation schemes, and similar formal arrangements are key policy instruments. National regulatory frameworks should encourage and support these instruments, which provide a structured, predictable basis for cooperation among States, competent authorities, and airlines to prevent, handle, and remove inadmissible passengers.

Consistent with the cooperation principles reflected throughout ICAO Annex 9, including Standard 5.1 on communication and cooperation between States and Standard 5.14 concerning the exercise of necessary precautions, these arrangements can help translate high-level policy principles into practical operational procedures, clarify stakeholder expectations, and support more consistent implementation of Annex 9 Standards and Recommended Practices (SARPs).

As the study shows, well-designed MoUs or equivalent arrangements can provide tangible benefits for all stakeholders. For airlines, they can reduce legal and financial uncertainty, support the defence or mitigation of penalties where aircraft operators have exercised the necessary precautions required under ICAO Annex 9 - Facilitation Standards 3.35 and 5.14, and limit exposure to open-ended or disproportionate costs. In jurisdictions with recurring or similar inadmissibility patterns, such arrangements may also introduce threshold-based or aggregate approaches to enforcement, ensuring that penalties remain proportionate and linked to systemic risks rather than applied automatically on a per-passenger basis.

For governments and competent authorities, these frameworks can improve compliance outcomes, encourage investment in preventive systems and training, reduce disputes, and enable more efficient, coordinated removals. They also provide a structured platform for resolving complex or recurring operational challenges.

To be effective, such arrangements should address:

- Roles and responsibilities of stakeholders, clearly defining the respective obligations of airlines, competent authorities, airports, and ground handlers in relation to document verification, inadmissibility prevention, case handling, and removal coordination.
- Standards for reasonable aircraft operator diligence, specifying the checks expected of aircraft operators and how the use of verification systems, escalation channels, and

competent authority guidance will be assessed when determining whether the necessary precautions required under ICAO Annex 9 Standards 3.35 and 5.14 have been exercised.

- Notification procedures, outlining the information to be provided to airlines following an inadmissibility decision, including responsible authority contacts, required documentation, and expected timelines for removal.
- Cost allocation principles, covering expenses related to custody, care, escorts, and removal, while incorporating safeguards against disproportionate or cumulative financial exposure, consistent with ICAO Annex 9 Standards 5.9 and 5.9.1.
- Penalty mitigation and compliance recognition mechanisms, supported by evidence that aircraft operators exercised the necessary precautions required under ICAO Annex 9.
- Dispute resolution and review procedures, establish clear channels for airlines to challenge penalties or cost claims, submit supporting evidence, request reconsideration, and receive reasoned decisions from competent authorities.

Appendix B: Methodology

This appendix outlines the methodology applied in the study. The analysis combines an industry survey of airlines and border control authorities, semi-structured interviews with selected stakeholders, and a comparative review of national legislative and regulatory frameworks governing the handling of INADs across IATA regions. These methods provide complementary perspectives on the scale, causes, and operational implications of inadmissibility cases, as well as the regulatory environments shaping airline and State responsibilities.

Quantitative Survey

The quantitative airline survey was conducted among 49 IATA member airlines across five global regions: Europe, the Americas, Africa & the Middle East, Asia Pacific, and North Asia. In parallel, a survey of border control authorities captured responses from 22 state authorities across four global regions: Europe, the Americas, Africa & Middle East, and Asia Pacific.

The surveys were designed to provide an initial, data-driven overview of the scale and operational impact of INAD cases. Airlines and state authorities were requested to provide data covering INAD volumes and observed changes over time, causes of inadmissibility, route-related trends, quantifiable financial expenses, and operational impacts. The findings primarily covered inadmissibility cases recorded in 2024.

Survey responses were received from 16 airlines based in Europe, 12 in the Americas, 7 in Africa and the Middle East, 6 in the Asia Pacific, and 8 in North Asia. On the authorities' side, responses were received from 14 jurisdictions in the Americas, 5 in Europe, 2 in Africa & the Middle East, and 1 in the Asia Pacific.

Survey Participation by IATA Regions

REGION	AIRLINES	STATE AUTHORITIES
Europe	16	5
Americas	12	14
Africa & Middle East	7	2
Asia Pacific	6	1

North Asia	8	N/A

The survey was disseminated through IATA internal channels, including regional and local offices, to maximize outreach and encourage broad participation.

The survey dataset is self-reported and was not designed to produce traffic-weighted or statistically representative global INAD figures. Instead, it provides an indicative overview of industry trends, operational challenges, and cost drivers associated with inadmissibility cases. The survey findings informed the subsequent qualitative phase of the study.

Qualitative Interviews

Twenty semi-structured interviews were conducted with selected airlines and border control authorities to complement the survey results with operational insights and illustrative examples. Participants were selected through a purposive, regionally stratified sampling approach, targeting IATA member airlines and jurisdictions across all global regions and reflecting a range of operational environments, regulatory frameworks, and international network structures.

Participants were selected based on their operational relevance to handling inadmissible passengers. This included exposure to high-volume international travel, visa-restricted routes and strict entry requirements (e.g., Schengen area, electronic travel authorization regimes, etc.); complex airline operations (i.e., multiple hubs, codeshares, and alliance partnerships); and major international gateways and migration corridors, where inadmissibility cases are more likely to occur. IATA contacted prospective participants through internal channels, including regional and local offices.

Interview Participation by IATA Regions

REGION	AIRLINES	STATE AUTHORITIES
Europe	6	1
Americas	4	3
Africa & Middle East	1	1
Asia Pacific	3	N/A
North Asia	N/A	N/A

Sample Scope and Limitations

The study combines survey responses and interviews with airlines and border control authorities across all IATA regions, reflecting a broad range of operational, regulatory, and geopolitical contexts in which INAD cases occur. Many participating airlines operate international networks, including visa-restricted or strict-entry markets, serve major hub airports, or participate in global alliances and codeshare partnerships, providing operational perspectives from various international travel environments.

Combining survey data with qualitative insights from semi-structured interviews enabled the comparison of operational experiences with broader industry trends, strengthening the credibility of the findings and illustrating key issues with real-world examples.

Responses were analyzed using a thematic framework covering areas such as ICAO Annex 9 - Facilitation alignment and enforcement in national legislations, causes of inadmissibility and liability

allocation, pre-departure prevention measures and technology integration, operational disruptions and removal challenges, and State-airline communication and cooperation mechanisms.

Participation in the study was voluntary and based on purposive sampling; therefore, the sample is not statistically representative of the global airline or State authority population. While respondents represented stakeholders from multiple regions and operational contexts, the number of interview participants fell short of the initial target.

Regional participation also varies, reflecting differences in the distribution of large international carriers and hub airports. Findings should therefore be interpreted as indicative insights into industry practices, trends, and challenges rather than a comprehensive representation of all jurisdictions or operational environments.