



IWT Assessment

for IEnvA and non-IEnvA Airlines

Standards Manual

Edition 2



Effective Date: 1 May 2021





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Introduction and Purpose

1.1.1 The IWT Standards Manual contains the Standards and Recommended Practices that form the basis of compliance of the IWT Assessment Program.

How to use this manual

1.1.1 This manual provides Standards and Recommended Practices (SARPS) for IEnvA Stage 2 Registered Airlines, and airlines with without IEnvA Registration.

1.1.1.1 IEnvA Registered Operators are only assessed against IWT SARPS. (IWT)

1.1.1.2 Non-IEnvA Operators are assessed against all the SARPS in this manual. (IWT & IWTs)

Revision and Maintenance of this document

1.1.2 IATA will publish revisions to this document to ensure the content remains current and meets the needs of the IWT Assessment Program.

1.1.3 During a regular revision cycle, where a change to this document is required:

1.1.3.1 A change to this document will always result in a new edition of the manual and incorporate previously issued Temporary Revisions (TRs) since the previous edition.

1.1.3.2 The cover of this document will indicate the edition number and the date to which it becomes effective, while the footer of the pages within will indicate the edition number and the published date.

1.1.3.3 A revision to this document becomes effective on a date agreed upon by the IEnvA Oversight Council (EOC).

1.1.3.4 During a short revision cycle, where a rapid change to this document is required, a Temporary Revision (TR) may be issued, and will indicate:

1.1.3.4.1. a unique reference number linking it to the appropriate edition;

1.1.3.4.2. a new reference number associated to the content requiring change;

1.1.3.4.3. a date of issue and effectivity;

1.1.3.4.4. the signature and date of the approving authority.

Manual Approval and Authority

1.1.4 IATA will internally draft any required changes, in consultation with applicable parties, if necessary.

1.1.5 An adequate review period must be provided to allow for external feedback.

1.1.6 An IATA internal review of feedback and the incorporation of final changes will occur.

1.1.7 The Director, Aviation Environment is the final approving authority for this manual or any temporary revisions.

Content Changes

1.1.8 A new edition must be accompanied by a description of significant changes table that will highlight only the significant changes made.



Conflicting Information

1.1.9 Manuals and requirements provided in this document is not revised concurrently with other manuals, thus creating the possibility of conflicting information in different manuals.

1.1.10 In the case of conflicting information in different documents, the information contained in the manual with the most recent revision date should be presumed to be valid.

Authority

1.1.11 The IWT Assessment Program is a voluntary program available to airlines and is administered by IATA. Oversight of the IWT Assessment Program is provided by the IEnvA Oversight Council (EOC).

Abbreviations, Acronyms, Definitions

1.1.12 The terminology used in the manual is consistent with that in the other manuals that comprise the documentation system. Any related terms, as they are used in the context of the IEnvA Program and its documents, are defined in the IATA Reference Manual for Audit Programs (IRM).

IEnvA Standards

1.1.13 IWT Standards are specified systems, policies, programs, processes, procedures, plans, sets of measures, facilities, components, types of equipment or any other aspect of operations under the scope of IEnvA that have been determined to be a necessity for IEnvA registration, and with which an operator will be expected to be in conformity at the conclusion of an assessment. Standards always contain the word "shall" (e.g. "The Operator shall have a procedure...") in order to denote that conformance by an operator being assessed is a requirement for IWT registration. During an assessment, determination of nonconformity with specifications contained in an IEnvA Standard results in a Finding.

Compliance Obligations	A collective term for environmental requirements that the Operator should comply with and include an Operator's Legal Obligations, Other Obligations, and Expectations from Stakeholders
Compliance Review	A documented systematic investigation of an Operator's Compliance Obligations that determines compliance or non-compliance. In IEnvA, an Operator has a choice to perform a Compliance Review of all its Compliance Obligations or to have a documented Operational Control that, if carried out, ensures compliance with the associated Compliance Obligation.
Corrective Action Plan	A documented procedure describing how a non-compliance or a finding will be addressed to achieve compliance with the associated requirements or Standard.
Environmental Aspects and Impacts	A collective term that describes the causes and effects of the Operator's <ul style="list-style-type: none"> • Environmental Aspects: An Operator's activities, products, and services that can interact with the environment. • Environmental Impacts: The environmental effects of an Operator's activities, products, and services.
Environmental Policy	A written statement that is endorsed by an Operator's leadership, which outlines the Operator's environmental vision and most significant environmental objectives and principles related to its operations.



Environmental Management Plans (EMP):	A documented description of the implementation, objectives, and controls that an Operator will use to address environmental impacts.
Environmental Management System (EMS):	A generic Environmental Management System that is not industry-specific, but includes such programs such as the IEnvA Program.
Focal Point	A person or role that serves as the primary point of communication-related to the Operator's IEnvA System.
IEnvA Program	IATA's Environmental Assessment Program, including its documents, processes, procedures, intellectual property, meetings, and business unit.
IEnvA System	An Operator's implementation of the IEnvA Standards and Recommended Practices.
Internal and External Influences:	Political, economic, social, technological, environmental, legal, and any other effects that can influence the Operator's environmental performance or the IEnvA System.
IWT Policy	A written statement that is endorsed by an Operator's leadership, which outlines the Operator's zero tolerance approach in addressing IWT matters. The IWT Policy and Environmental Policy can be combined.
Leadership	A managerial or leadership role, position, or person that has the ability to provide the necessary human and financial resources to implement and sustain an Operator's IEnvA System.
Management Review	A discussion on IEnvA that is attended by the Operator's IEnvA Leadership that takes place at least once every 12 months.
Operational Control	<p>An instruction or a procedure that describes actions and related information that, if followed, ensures operational activities and emergency responses are conducted in accordance with Compliance Obligations.</p> <p>Operational Controls has to include any relevant and useful information such as:</p> <ul style="list-style-type: none"> • Accountability and responsibilities • Monitoring procedures/instructions • Operational envelope • Monitoring equipment – calibration certificates • Timing and frequency • Any other internal requirements of the Operator <p>Also known as an S.O.P. (Standard Operating Procedure).</p>
Risks and Opportunities	A collective term that refers to uncertainties that could have an adverse or beneficial effect on the Operator's IEnvA System or the Operator's environmental performance.
Scope	A documented description of the activities and areas that an Operator's IEnvA System takes into account for compliance with the IEnvA Standards.
Stakeholders and Interested Parties	An individual, organization or system with an interest or concern in the Operator's IEnvA System and the Operator's environmental performance.



Target and Objective	A collective term that refers to measurable way-points, that, if achieved, will result in the Operator achieving some or all of the aspirations provided by its Environmental Policy.
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Revision Highlights

The following table provides a brief description of the most significant changes from the previous version of this document. It is not intended to indicate every editorial change (e.g. typographical correction, formatting improvement), but should any discrepancy exist, the contents of this manual have precedence over this table.

Revision Details

Edition 1	Change
Draft 10	Reviewed by EOC
Draft 11	Changes tracked. Changes relate to updates in IEnvA IWT Standards Manual Edition 2
Draft 12	Changes Tracked in IWT Standards Manual Edition 1.91
Final Draft	This document



IWT Assessment Standards and Recommended Practices

The IWT Assessment Program was developed by IATA to provide the airline industry with an internationally consistent evaluation system for assessing an airline's compliance with the Buckingham Palace Declaration and the commitments of the 72nd IATA AGM Resolution on IWT.

This section of the document sets out program management standards applicable to IATA for ensuring IWT Assessments maintains the required levels of quality and consistency.

1. Leadership and Policy

IWTs 1.01 The Operator's Leadership shall demonstrate their commitment to the Buckingham Palace Declaration and the fulfillment of contained commitments.

Assessor Actions

Documented:

1. Identified a BPD signed by the Operator's Leadership; AND
2. Identified an IWT Assessment Agreement signed by the Operator's Leadership if the Operator is not an IEnvA registered airline.

Guidance

The Operator's leadership's commitment is vital for the successful implementation of the Standards in the IWT Assessment. Ideally, a senior role should take ultimate accountability and responsibility for the implementation and stewardship of the Operator's efforts against IWT and compliance with the IWT Standards.

IWT 1.02 The Operator shall have a policy statement that includes a zero-tolerance approach to IWT that is endorsed by the Operator's Leadership.

Assessor Actions

Documented:

1. Identified a statement where the Operator indicates its zero-tolerance approach in dealing with IWT, and
2. Identified the Operator's leadership's endorsement or support of the statement.

Guidance

A policy statement which includes a zero-tolerance approach to IWT is an important step to demonstrate an Operator's commitment to support the fight against IWT and should be communicated to staff and must be publicly available. The Operator may choose to integrate the statement into its existing Sustainability or Environmental Policy statement, or to have a stand-alone statement. Ideally, the Operator would ensure compliance with the requirements provided in LED 1.04 S1 (IEnvA Standards Manual) and the associated ESARPS related to developing and maintaining an Environmental Policy statement.



Operators are cautioned that a zero-tolerance approach may be legally complex or not even possible, specifically with regard to passengers convicted of wildlife smuggling crimes. However, Operators will have more flexibility in holding or rejecting cargo consignments. Hence, when developing a zero tolerance policy statement, Operators are encouraged to take a more general view, rather than a statement focused of specific areas of activities.

2. Context

Overview

This section requires the Operator to identify the areas of its operations where IWT activities is possible and significant. By doing this, the Operator sets its scope and focus its efforts on those identified areas. To ensure effective identification and inclusion of such areas of operations, the Operator should also be aware of the possible consequences of rampant IWT which includes zoonotic disease spillover and wildlife conservation.

IWTs 2.01 The Operator shall identify and document flight routes and the areas of its operations where IWT activities may be significant.

Assessor Actions

Documented:

1. A documented list of the Operator's routes and regions where IWT activities may be most likely or significant.

Guidance

The Operator is required to identify and document the locations of its Operations where IWT activities are most likely to take place and the operational activities related to IWT. The activities and areas presented in this document will guide both the Operator and Assessors to where the IWT Standards should be applied and should be seen as the scope of the IWT Assessment.

It is highly recommended that the document provides relevant, contextual and useful information to the Operator and to all persons that may work use the document, including the Operator's leadership and internal assessors. Even though this is not an explicit requirement of the Standard, it can be useful for the Operator to include additional information and data related to the identified area, activity or route. Such as the number of people in a building, floor area and building or site reference numbers. For activities such as flight routes, it can be useful to include likely aircraft to service a destination, distance of service and can even include basic environmental-related facilities/services available at destination airports.

The Operator should consult material provided by TRAFFIC and United for Wildlife to directly identify the latest flight routes and regions where IWT is prevalent.

IWTs 2.02 The Operator should identify internal and external stakeholders that can relate to IWT and its operations.

Assessor Actions

Documented:

1. Identified documented internal and external stakeholder that are related to IWT.

Guidance



The Operator should identify relevant external stakeholders related to the areas identified in (IWTs 2.01). The identified external stakeholders would be the primary candidates for various outreach initiatives (such as required by IWT 5.03), but also where the Operator should direct some additional oversight or monitoring related to IWT activities.

The identification of external stakeholders are especially applicable to airlines. Airlines generally have a high reliance on external service providers, often in many different countries, where the quality of their service can greatly influence the effectiveness of IWT activities and reputation of the Operator.

The Operator may utilize the IATA-maintained register of IEnvA Stakeholders and Interested Parties to cross-reference potential stakeholders with specific IWT related functions.

Other than identifying associated stakeholders for IWT, the Operator should also ideally keep a consolidated register of the identified Stakeholders and Interested Parties.

Examples include:

- other airlines
- ground handlers
- freight forwarders
- express couriers
- postal services
- airports
- regional associations
- travel agents

3. Planning

This section does not require any specific procedure or action but provides general requirements for the Operator when developing processes and procedures related to the ESARPS provided in this document.

IWT 3.01 The Operator shall have Operational Controls to identify and reduce IWT in its flight routes, areas of operations (as identified in IWTs 2.01 or the Operator's IEnvA Scope).

Assessor Actions

Documented:

1. Identified documented procedures, processes or any other means of control related to identifying and reducing IWT with specific attention on the flight routes and regions identified in IWTs 2.01, OR
2. Identified documented procedures, processes or any other means of control related to identifying and reducing IWT with specific attention on the flight routes and regions identified in the Operator's IEnvA Scope as significant.

Guidance

For the Operator's IWT Policy Statement (established in IWT 1.02) to be effective, the statement should translate into actionable procedures to help identify and reduce IWT in all areas of the scope. The requirement of this Standard is to ensure that the Operator develops all relevant processes and procedures, implements the necessary changes and improvements and ensure they are maintained.



The Operator is also required to translate any targets and objectives contained in its IWT Policy Statement into workable plans, processes and procedures inside the airline.

Processes or procedures where the Operator may choose to integrate or demonstrate a IWT Policy include, but are not limited to:

- Documented, pre-determined disciplinary action for staff for IWT transgressions, and/or;
- Any strengthened/improved procedures to prevent IWT; and/or
- The facilitation of safe and anonymous reporting of suspicions by staff of IWT and IWT related matters, and/or;
- Training and awareness programs and/or;
- Any other procedures, processes or controls that can assist with limiting IWT.

IWTs 3.02 The Operator's Operational Controls related to IWT shall consider:

- a) what will be done;
- b) what resources will be required;
- c) who will be responsible;
- d) when it will be completed;
- e) how progress towards achievement will be monitored; and
- f) how these actions will be integrated in existing business processes.

Assessor Actions

Documented:

1. Identified that the Operator's Operational Controls include all the relevant elements:
 - a. Descriptive and clear;
 - b. Outlines the resources that are required to carry out the control;
 - c. Describes with relevant details the persons that have responsibility to ensure the control is carried out, and the person(s) who should implement the control;
 - d. Any relevant timelines, deadlines that are related to the control;
 - e. Any relevant monitoring requirements, and how monitoring and measurements should take place and be recorded;
 - f. The control should be actionable or be included into other daily operations.

Guidance

This Standard sets the minimum requirements for all controls related to IWT that the Operator utilizes. Controls should be well-designed and, when implemented, be effective in achieving its intended purpose. This Standard does not relate to its own specific outcome but to all related controls the Operator may be using relating to IWT.

An Operational Control can be identified as:

- An operating limit or criteria (ex. definition of the PH threshold for the wastewater);
- An instruction;
- A Standard Operating Procedure (SOP);
- Implementing control of process (ex. procedure to minimize the electricity use during night or week-end to minimize the environmental aspect "energy consumption");
- In the case of non-compliance with an obligation, a plan to achieve compliance;
- In the case of a compliance obligation, a procedure to maintain compliance.



This Standard only provides the minimum requirements for an Operator to consider when designing Operational Controls. An Operator, however, is likely to have several additional requirements, based on its own policies and practices.

IWTs 3.02 When developing or reviewing Operational Controls related to IWT, the Operator should engage with relevant subject matter experts (such as biologists and other stakeholders) to ensure the controls are sufficient and effective.

Assessor Actions

Documented:

1. Identified evidence that the Operator had consulted with, or that the Operator's controls are based on best practice provided by subject matter experts or relevant organizations.

Guidance

The Operator should work in partnership with both wildlife and public health enforcement authorities, conservation stakeholders, and the scientific community, to help reduce the risk of zoonotic spillover. The Operator should introduce proactive staff and passenger awareness measures on the public health risks of the intentional and unintentional handling of animal products.

This Recommended Practice refers specially to procedures that are intended to protect staff and passengers that may or have come in contact with animal products that may result in zoonotic disease spillover and spread.

For more information on Pandemic Prevention practices, see IATA's Pandemic Resilience Planning (PRP) briefing that integrates counter wildlife trafficking initiatives into a framework for improved prevention, response and recovery from future pandemics. Contact IATA for more information on the latest version of the PRP Document.

4. System

IWT 4.01 The Operator should adopt a zero-tolerance approach to IWT in its procurement activities.

Assessor Actions

Documented:

1. Identified documented vendor assessment criteria related to IWT; OR
2. Identified a procedure or instruction to include contractual terms with new suppliers related to IWT.

Guidance

The Operator should include IWT criteria in the assessment and procurement process for its suppliers. Operators may include the following IWT criteria when undertaking assessments and procurement with relevant suppliers:

- The Operator requires its vendors to have a zero-tolerance related to IWT, or
- The Operator requires its vendors to have a Policy Statement that includes a zero-tolerance approach related to IWT, or
- A contract clause which could include the following:



- "The Contractor shall comply with all applicable wildlife trafficking laws, statutes and regulations from time to time in force including but not limited to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) [collectively referred to as "Wildlife Trafficking Laws"]"
- "The Contractor represents and warrants that neither the Contractor nor any of its officers, employees or other persons associated with it has been convicted of any offence involving wildlife trafficking laws; and to the best of its knowledge, has not been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with wildlife trafficking;"
- "The Contractor shall implement due diligence procedures for any of its [direct] subcontractors and suppliers to ensure that there is no wildlife trafficking in its supply chains."

IWT 4.02 The Operator should undertake reasonable checks for IWT on cargo shipment in accordance with legal provisions, Contracts of Carriage and the Operator's own procedures.

Assessor Actions

Documented:

1. Identified a documented Operational Control for performing reasonable checks on cargo shipments related to IWT.

Guidance

Operators are required to conduct certain checks on its cargo in accordance with applicable regulations. The requirement of this Recommended Practice is that the Operator reinforces those checks, where possible, by including additional 'reasonable' checks related to IWT.

Operators should already provide enforcement authorities with detailed information on passengers and cargo shipments (e.g. Advanced Passenger Information and Advanced Cargo Information) where required by law. The enforcement authorities may analyze this data for IWT risk indicators. Operators should consider developing internal IWT risk indicators based on their network, past incidents, generic open source data, information provided by authorities and international organizations. Such indicators should be refined and updated based on new information and relevant operational changes. This information should be used by an Operator to establish bans on accepting future shipments from suspicious or known traffickers.

Note:

Based on ICAO Annex 17, cargo and mail may be accepted for transport if it originates from a known consignor, or has been screened by a regulated agent, otherwise the Operator is required to screen the cargo and mail. While screening requirements are specific to security threats which are acts of unlawful interference (bomb in the box), in the context of IWT, Operators should take reasonable steps to mitigate other risks.

Although not specific to IWT, when accepting cargo or mail for carriage the Operator should ensure that the cargo/mail:

- Has originated from a Known Consignor (KC) or a Regulated Agent (RA) with the company's unique identification code checked against the national KC/RA database
- Is accompanied by an Air Waybill, Consignment Security Declaration or other instrument confirming that the security measures have already been applied, by whom, using which method, where and when
- Does not contain signs of tampering



- Is subject to screening if it has not come from a secure supply chain (KC/RA) and/or there is evidence of tampering based on ICAO Annex 17
- Comprises matching details provided on the accompanying documentation. Inconsistencies in weight, commodity descriptions and values can be key indicators of potential illicit shipments which should raise suspicion and prompt further scrutiny.

IWT 4.03 The Operator shall carry out an approved IWT training program for relevant staff.

Assessor Actions

Documented:

1. Identified a documented IWT training plan for staff that has been approved by IATA; OR
2. Identified the Operator's use of approved training plans.

Implemented:

1. Identified a documented IWT training plan; or
2. Identified documented IWT training staff records.

Guidance

The Operator should identify key activities (IWTs 2.01) and the relevant staff (IWTs 2.02) for which the training will be provided.

The Operator may develop an IWT training program with the assistance of experts or through the adaptation of existing materials (e.g. training materials available through the ROUTES Partnership or IATA).

An IWT training program should include information on high risk routes, suspicious activities/consignments, reporting and handling procedures and health and safety protocols.

There is no specific requirement regarding the Operator's format of how the training takes place. Training may be provided person-to-person in a classroom, toolbox talks and/or online and can be included within existing training programs.

The Operator may also use its discretion on whether persons, that have previous received training are required to undergo refresher training which would only cover specific and relevant training material. An IWT training program should ideally be integrated into existing training programs already provided by the Operator (such as human trafficking training programs for crew).

IWT 4.04 The Operator shall recognize or incentivize activities or staff that leads to the interdiction of wildlife smuggling via cargo or passenger activities.

Assessor Actions

Documented:

1. Identified a documented procedure for recognizing positive contributions by staff to combat IWT.

Guidance

In the case of identifying and incentivizing staff, the Operator should be sensitive to staff members that may want to remain anonymous for their own personal safety.



IWT 4.05 The Operator shall have a procedure to prevent zoonotic disease spillover for persons that may come in contact with wildlife contraband.

Assessor Actions

Documented:

1. Identified a documented procedure for recognizing positive contributions by staff to combat IWT.

Guidance

In case of direct intervention and contact of IWT contraband, the Operator should have clear health and safety procedures for persons to avoid potential infection and potential spreading of zoonotic diseases. Measures that should be considered include the testing of contraband, the testing of persons that have come into contact with the contraband, and quarantine. Operators should also consider similar procedures for staff that deal with luggage, lost luggage and cargo shipments, and in some cases for passengers and cabin crew.

5. Communication and Reporting

IWTs 5.01 The Operator shall communicate it's IWT Policy Statement to its staff.

Assessor Actions

Documented:

1. Observed that the Operator's IWT Policy has been communicated to its staff; and
2. Observe that the Operator includes consideration to communication methods to communicate to the different levels and type of staff.

Guidance

The Operator's IWT Policy should be communicated to its staff and to relevant persons doing work on behalf of the Operator. Established communication channels used for communicating any corporate information would be appropriate for this communication. The reason for communicating the IWT Policy is to impart awareness to all employees and those working indirectly with the Operator regarding the Operator's position on IWT and to ensure they are aware of the importance and relevance to them.

Typically, the best form of communication is through briefings or short training sessions, formalized by a sign-in sheet which can also be used as a training record. However, simply including the policy on a notice board or a mass email campaign may also achieve awareness and understanding but should be followed up to check for effectiveness of the communication.

Persons who work on behalf of the Operator may include:

- Subcontractors carrying out short work assignments,
- Long term contract staff, and,
- Self-employed persons.
- All other service providers to the Operator.

IWTs 5.02 The Operator's IWT Policy Statement shall be available to the public.

Assessor Actions

Documented:



1. Observed that the Operator's IWT Policy is available to the public.

Guidance

To meet this Standard, the environmental policy can be displayed in relevant areas where the public can reasonably expect to visit which may include:

- On the Operator's public website,
- The Operator's annual report or an annual financial report, and,
- The Operator's corporate offices interfacing with customers or the public,
- Airline on-board magazine,
- Check-in desks or ticket-offices.

Where possible, the Operator should include the United for Wildlife roundel in its external communications and its publicly available IWT Policy.

IWT 5.03 The Operator should encourage relevant external stakeholders to adopt a zero-tolerance approach for IWT.
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Assessor Actions

Documented:

1. Identified evidence of where the Operator has engaged with an external stakeholder to encourage the adoption of a zero-tolerance approach regarding IWT.

Guidance

The Operator should identify relevant external stakeholders related to the areas identified in (IWTs 2.01) where it can encourage adoption of a zero-tolerance approach to IWT.

Ideally, Operators would demonstrate to external stakeholders the positive feedback it has received from employees, enforcement authorities, conservation non-governmental organizations (NGOs), social media, passengers etc.

IWT 5.04 The Operator shall have an IWT awareness raising program for relevant internal and external stakeholders.

Assessor Actions

Documented:

1. Identified documented IWT awareness raising program; and
2. Identified evidence of delivery of the IWT awareness raising program.

Guidance

The Operator should identify staff which may have exposure to IWT activities, and provide general awareness training of the effects of IWT, how the staff can contribute to reducing IWT and, if necessary, provide more in-depth training relating to IWT and their roles. Furthermore, Operators may also identify significant external stakeholders, such as passengers on high-risk routes. Where this is the case, the Operator is required to provide general awareness of IWT and its impacts to these stakeholders.



Operators should engage with the Secretariat of the UfW Transport Taskforce and/or relevant conservation organizations and national enforcement agencies to determine appropriate messaging related to the nature, scale and consequences of IWT such as discussed in IWT 10.01 and the set of example messages developed by the UfW Transport Taskforce. Operators can engage with conservation experts (e.g. UfW Transport Taskforce and the ROUTES Partnership) to obtain awareness-raising materials such as videos, posters, blog and social media content, in-flight magazine articles.

Operators may either raise awareness with all staff or on a selective basis with those who may interact directly with the Operator's customers, cargo and baggage handling or who are employed on high risk routes (as determined by interactions with conservation experts and guided by analysis of IWT cases).

Operators may either raise awareness with all customers such as passengers, corporate clients and cargo customers or only with those stakeholders related to high risk routes or activities (as determined in IWT 2.01).

When determining the frequency of awareness raising activities, Operators should consider staff and contractor turnover rates, new information on the nature, scale and consequences of IWT, as well as updated materials provided by conservation experts.

IWT 5.05 The Operator should identify and use opportunities to promote the BPD to relevant external stakeholders.
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Assessor Actions

Documented:

1. Identified documented evidence of promotion of the BPD at industry events and meetings; or
2. Identified documented evidence of inclusion of BPD in the IWT criteria for vendor assessment and procurement processes.

Guidance

IATA, as an industry representative, promotes the Declaration on behalf of its Member airlines. Members adopted an IWT Resolution at the 72nd IATA Annual General Meeting (AGM) in June 2016 in Dublin, "encouraging members to sign the United for Wildlife Transport Taskforce Buckingham Palace Declaration". Operators are encouraged to use IATA's governance structure (e.g. Board of Governors, Sustainability and Environment Advisory Council, the IATA Wildlife Task Force etc.) to promote the Declaration.

Operators may promote the Declaration with suppliers and external stakeholders. For example, an Operator may include signing the BPD as an IWT criteria in vendor assessment and procurement processes. Operators may also promote the Declaration with other transport sectors at industry forums.

IWTs 5.06 The Operator shall have an Operational Control that indicates how IWT information is received, processed, stored and responded to.

Assessor Actions

Documented:

1. Identified a point of contact for receiving IWT information; and
2. Identified a documented procedure that indicates how information related to IWT is handled.

Guidance



The Operator may receive actionable information from the UfW Transport Taskforce (e.g. alerts and web resources), conservation NGOs, local Enforcement Authorities and the World Customs Organization (WCO). To receive such information, a point of contact within the Operator is required.

There are two forms of timely actionable information:

- Immediate information (i.e. real-time) on suspected illegal wildlife traffickers or shipments must be provided to the Operator prior to the flight departure. The Operator should immediately contact the local enforcement authority and could inform the inbound enforcement authority if the passenger, baggage or cargo shipment was not stopped at point of departure. An Operator may have more flexibility in holding a cargo shipment prior to inspection by the local enforcement authority.
- Long-term information can be used to identify trends related to methods of air transportation (e.g. passenger vs. cargo), obfuscation methods, key routes, ports and other locations and hence inform awareness and reporting methods, principles and procedures.

Generally, the requirements of this Standard would already be present in the communication procedure(s) that are required by the IEnvA system (ENG 5.08, ENG 5.09 and ENG 5.11).

IWT 5.07 The Operator shall have a reporting mechanism that its staff can use to report suspected IWT activities.
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Assessor Actions

Documented:

1. Identified a documented procedure that indicates how to report suspected IWT activities.

Guidance

The Operator is required to provide a safe and secure reporting or communication mechanism for staff to be able report on activities related to IWT.

Operators have a duty to notify relevant law enforcement authorities of suspected illegal activities including IWT. Operators should have a communication system that facilitates the reporting of IWT (stand-alone or integrated) and clearly defined procedures for how to escalate reports with enforcement authorities with clear lines of communication. The Operator should encourage enforcement authorities to provide feedback post-prosecution as an important feedback mechanism for improving the Operators IWT-related activities.

The reporting procedure would ideally include a variety of communication methods including verbal (in-person, telephone, radio) and/or electronic (reporting app, email, ACARS). The Operator should also ensure that reporting can be anonymous with supporting whistle-blower policies and facilitate reporting from passengers and customers.

The Operator is not limited to any specific reporting systems and can make use of any self-developed procedure or existing reporting systems. For example:

- Using self-developed communication procedures;
- Local/airport level reporting (phone/email etc.), should this exist;
- An IWT (or similar) reporting app;
- United for Wildlife Transport Taskforce web portal reporting tool.

Generally, all staff should have access to the reporting procedure, however, in some cases an Operator would provide access only to those that may interact with IWT, such as:



- Check-in staff
- Cabin Crew
- Ramp security
- Cargo facility staff/loaders
- Ramp staff
- Baggage handlers
- Aircraft Commander

IWTs 5.08 The Operator shall communicate all identified IWT incidents related to its operations to its Leadership.

Assessor Actions

Documented:

1. Identified a procedure that identifies significant IWT information and who it should be communicated to.

Guidance

The Operator should have a procedure to identify significant and relevant IWT related information that should be reported to its Leadership. The intention is to inform the Leadership of either potentially harmful information or of time-critical information that would otherwise not be acted upon in a suitable time or manner.

Where the Operator has a system in place for managing communications:

Many Operators may have an established system for managing communications. However, Operators should check to ensure that any existing communication process is compatible with identifying IWT-related information.

Where the Operator does not have a system in place for managing communications:

The Operator may develop a process for communicating internally on IWT-related issues to staff and leadership and those who work on behalf of the Operator (e.g. handling agents, agency staff, and contractors). These can be developed by a communications representative working with sustainability or environment teams and would need to be integrated into existing communications program.

The procedure would ideally include the following elements:

- Who is responsible for internal communication programs;
- Who is responsible for IWT- related communications and incidents;
- The format of internal communication programs (e.g. via the company intranet, posters, magazines etc);
- Where internal information requests, suggestions or complaints will be recorded;
- How the environmental policy will be communicated internally;
- Controls on issuance/approvals.

IWT 5.09 The Operator shall communicate identified IWT transgressions to relevant custom authorities.

Assessor Actions

Documented:

1. Identified a documented meeting report with national enforcement authorities where IWT is discussed in the prior 24 months.

Guidance



To ensure that the Operator is informed of the latest information on IWT related activities, and for the Operator to provide information on potential IWT activities to authorities and other parties that can aid in reducing IWT.

Operators should develop a working relationship with enforcement authorities to determine the nature, scale and consequences of IWT. Consultations may include other aviation stakeholders such as airports, freight forwarders, postal operators and express couriers. This can be undertaken at a local, national and/or regional level if deemed appropriate (e.g. coordination through INTERPOL).

When meeting with authorities, it is recommended that the following topics are discussed:

1. Utilization of digital documentation including the adoption of e-Freight and e-Airway Bills which can enhance risk management capabilities in order to improve the detection and interception of IWT by enforcement authorities.
2. Leveraging Remote or Central Image Processing and the multiplexing of X-ray images to maximize opportunities for the sharing of X-ray images with other interested parties such as enforcement authorities.
3. Cooperation and sharing of data with other government agencies including aviation security authorities should be sought to allow for the risk-based screening of passengers and cargo. Additionally, the adoption of interactive API systems would enable appropriate steps to be taken prior to the flight departure.
4. To the extent practicable, threat information should be shared by government authorities with the Operator to enhance their training and operational capabilities.
5. Any new or existing enforcement mechanisms that the Operator can contribute to or participate in.

6. Review and Maintenance

IWTs 6.01	The Operator shall ensure that its IWT Policy is relevant and up to date.
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Assessor Actions

Documented:

1. Identified that the Operator's IWT Policy has been reviewed, approved, or endorsed at least in the past 24 months.

Guidance

Operators should document their IWT Policy and its revisions. Ideally, this should be done in accordance with the Operator's document control procedures. Changes to the policy should be made with full support and endorsement of the Operator's Leadership. The Operator's Leadership should fully understand how the changes can affect the Operator's activities and may impact the performance of the Operator. Any resulting changes to the IWT Policy should reflect the awareness and understanding of the Operator's Leadership.

IWTS 6.02	The Operator shall ensure that its Operational Controls related to IWT are maintained and effective.
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Assessor Actions

Documented:



1. Identified that documented controls related to IWT have been reviewed for relevancy and effectiveness.

Guidance

Documented Operational Control are critical to both the effective implementation of the Standards in this document and for the ability to conduct internal and external compliance assessments.

This Standard specifically refers to the Operator ensuring that those controls are up to date, relevant and effective. The Operator can achieve this by maintaining a record of all controls (even if undocumented) with associated dates of the last time it was reviewed for effectiveness and whether it has been implemented.

7. Improvement

IWTs 7.01 The Operator shall improve its Operational Controls' effectiveness wherever possible.

Assessor Actions

Documented:

1. Identified procedures or controls that have been adjusted or introduced to improve effectiveness or compliance with the Standards in this document.

Guidance

The data produced by internal reviews of the effectiveness of Operational Controls related to IWT should be used to identify procedural shortfalls and areas for improvement. These areas of improvement should be noted by the Operator and improved upon wherever possible.

END.