Non-Compliant and Hybrid Scenarios in Air Mail Operations

Version 0.1
2026

IATA Air Mail Board (AMB)

Acknowledgment

The **IATA Air Mail Board (AMB)** gratefully acknowledges the technical assistance and advice concerning the development of this position document by the following individuals:

Airlines:
- William Roach – General Manager, Global Postal Operations (American Airlines)
- Bernard Heuzeveldt – Program Manager (KLM)
- Stephanie Giraldi – Senior Manager Postal Network Optimization & Performance (United Airlines)
- Bradley Callachan – Manager, Postal Affairs (Air Canada)
- Natalia Lüescher – Cargo Ops Excellence & Offer Management (Swiss International Airlines)
- Graham Pavitt – Airmail Product Executive (IAG Cargo)
- Uwe Gittrich – Manager Airmail Processes (Lufthansa Cargo AG)
- Christophe Requile – Deputy Manager Load-control (Cargolux)
- Jeffrey Elder – Head of Cargo Products (Delta Airlines)
- Pascal Lai – Cargo Customer Solutions Manager (Cathay Pacific)
- Sharon Rodrigo – Mail & Product Development Manager (Qatar Airways)
- Faris Badri – Product Development Manager (Emirates)

AMB Secretary:
- Matthew Tang, Senior Manager E-commerce & Cargo Operations (IATA)

The collaborative efforts of AMB members and the initiative-taking adoption of IATA standards by airlines and industry stakeholders around the globe demonstrate a shared commitment to excellence in the air mail industry.

Executive Summary

Global mail and cargo transport are governed by distinct regulatory frameworks. The **Universal Postal Union (UPU) Convention** for mail and the **International Civil Aviation Organization (ICAO) Conventions** related to the carriage of cargo by air. These frameworks define the standards for handling, documentation, and messaging within their respective domains.

In response to commercial pressures and capacity constraints, postal operators and airlines may have increasingly explored some **non-compliant** air mail handling scenarios. Some stakeholders even call them **hybrid scenarios**.

These involve but are not limited to:

1) **Cargo shipments delivered as mail at destination**, bypassing standard cargo protocols and entering the postal network midstream.

2) **Mail transported under cargo conditions**, using cargo documentation, infrastructure, and procedures instead of the designated postal supply chain.

3) **Country A** sends mail to **Country B,** and then **Country B** sends it onward to **Country C** without complying with proper standards.

4) **Country A** uses the system and International Mail Processing Centre (IMPC) code of another country to process mail operations.

While these arrangements may seem to offer short-term operational flexibility, they diverge from established UPU processes and Electronic Data Interchange (EDI) standards, introducing significant challenges, such as reduced shipment visibility and tracking, inconsistent handover registration, invoicing inaccuracies, customs and security handling confusion, unclear liability frameworks, and potential degradation of service quality.

As non-compliant and hybrid scenario practices become more common, IATA is frequently approached for clarification on applicable standards. In response, the **IATA Air Mail Board (AMB)** has issued this document to show the airline industry's collective position. It is **NOT** a procedural guide, but a statement of concern and clarification.

The AMB underscores a core principle:

Shipments must be processed according to their entry point into the supply chain: mail as mail, cargo as cargo.

This distinction is essential to maintaining integrity, reliability, and regulatory compliance of global air mail operations. The AMB recommends that air mail stakeholders *DO NOT pursue* non-compliant and hybrid scenarios as sustainable or standardized solutions and advises caution due to the risks outlined above.

Air Mail and Air Cargo

Air Mail

Air mail refers to dispatches of correspondence and other items tendered by and intended for delivery to postal services in accordance with the rules of UPU, such as letters, parcels, and packages. UPU sets international postal standards and facilitates the exchange of mail between countries. The UPU's role is crucial in ensuring that mail can be reliably and efficiently exchanged across international borders. IATA also works with the UPU to develop standards and procedures for the transportation of mail by air, ensuring that mail services are integrated smoothly into the broader air transport system.

The conventions governing air mail include postal service agreements and security measures. IATA and UPU have developed a framework for postal service agreements to standardize contracts between carriers and postal operators. This framework ensures that mail is handed consistently and efficiently across different carriers and countries. Security and facilitation are also important aspects of air mail, similar to air cargo. ICAO and WCO guidelines govern air mail security to prevent unlawful interference.

Air Cargo

According to IATA, air cargo is equivalent to the term 'goods', which means any property carried or to be carried in an aircraft, other than mail or other property carried under the terms of an international postal convention, baggage, or property of the carrier, provided that baggage moving under an air waybill (AWB) or a shipment record is cargo.

The transportation of air cargo is governed by ICAO convention. ICAO establishes global standards for aviation safety and security, ensuring the secure and efficient movement of air cargo across international borders. IATA plays a crucial role in developing standards and procedures for the air cargo industry. One of its contributions is the IATA Cargo Handling Manual (ICHM), which outlines best practices for handling cargo. Additionally, WCO collaborates with ICAO to secure and facilitate the global air cargo supply chain, ensuring compliance with customs regulations. ICAO and WCO work together to protect air cargo from unlawful interference while facilitating smooth cross-border movement. This collaboration ensures that air cargo operations are both secure and efficient.

Consolidation Differences

Mail is always treated as a consolidated shipment because a **CARDIT** message represents one or more **receptacles**, which are the smallest transport units handled by a carrier.

Cargo	TWO hierarchical layers
Air Waybill (AWB)	Represents the overall shipment.
House Air Waybill (HAWB)	Represents individual consignments within the AWB. Each HAWB may consist of one or more pieces, and the AWB piece count equals the sum of all HAWB pieces. Importantly, a HAWB cannot represent a consolidation.

Mail	THREE hierarchical layers
Mail Consignment:	The highest level, typically represented in CARDIT or CN documents.
Receptacle	The physical 'pieces' level which is transported by the carrier.
Mail Item	The individual letters or parcels inside a receptacle. The piece count for a mail consignment equals the number of receptacles. The number of mail items is unknown and contents differ per mail item.

The transport of Mail under an AWB is not possible, from legal and operational perspectives:

Legally, the ICAO Convention for the Unification of Certain Rules for International Carriage by Air (Montreal Convention of 1999) and the preceding conventions that are still applicable in some ICAO members (e.g. Warsaw Convention of 1929), which regulate the Air Waybill and related liability, expressly exclude the carriage of postal items.

Operationally, each mail item would need to be represented by a HAWB. Current industry standards **do not allow** carriers to receive mail item-level information. In theory, the HAWB level could correspond to the receptacle level, but this is **not feasible** under existing standards because:

1) Each HAWB requires shipper and consignee details, and
2) Mail processes do not provide this information to carriers.

The diagram below illustrates the consolidation differences between cargo and mail:

Consolidation differences – Cargo and Mail
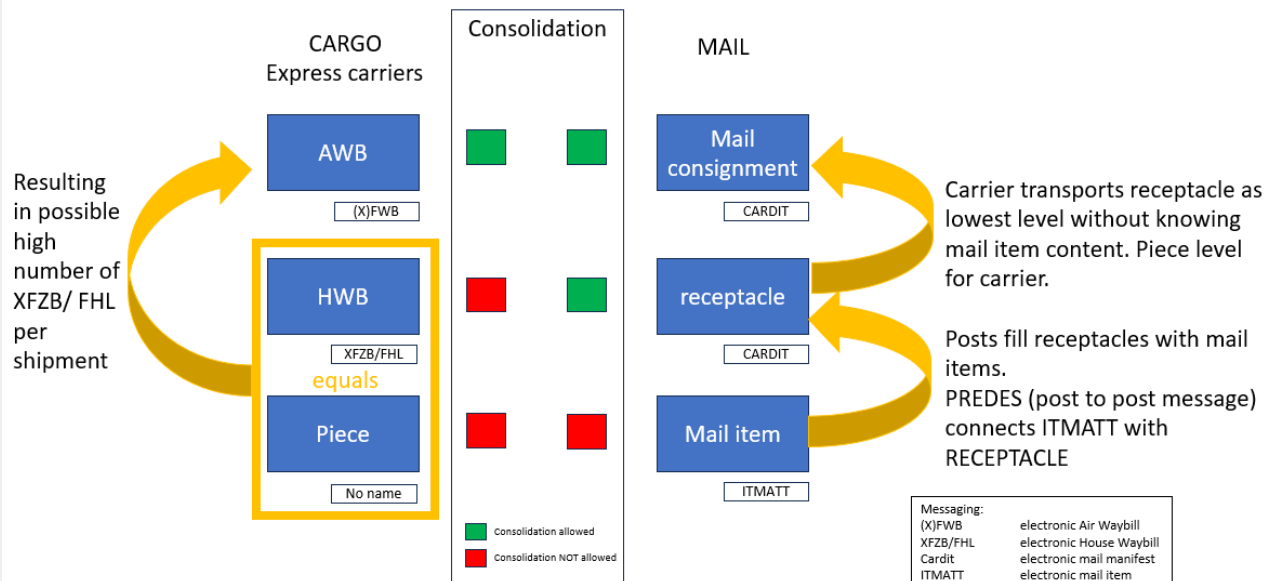
The Associated Risks

This document focuses on 4 major non-compliant and hybrid scenarios:

1) **Cargo shipments delivered as mail at destination**, bypassing standard cargo protocols and entering the postal network midstream. (Type 1)

2) **Mail transported under cargo conditions**, using cargo documentation, infrastructure, and procedures instead of the designated postal supply chain. (Type 2)

The movement in both scenarios 1 and 2 can take place in direct flights, transit operations, transfers, and transshipments.
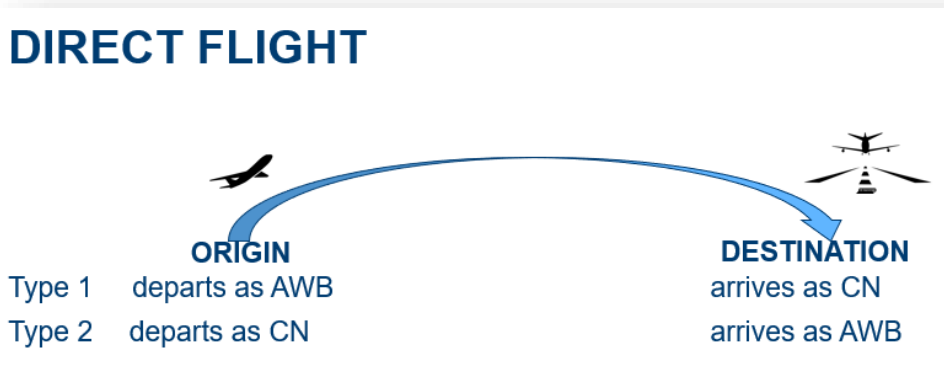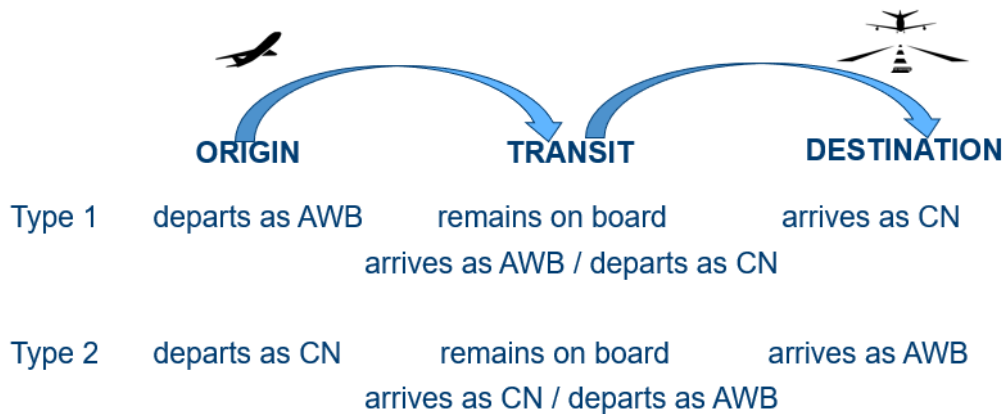

Direct flight:

Dispatching mail under differing regulations from those governing its arrival at the destination on a single-leg journey is non-compliant.

This practice results in incorrect documentation of the transported goods, which may lead to fines due to the importation of undeclared commodities.

TRANSIT

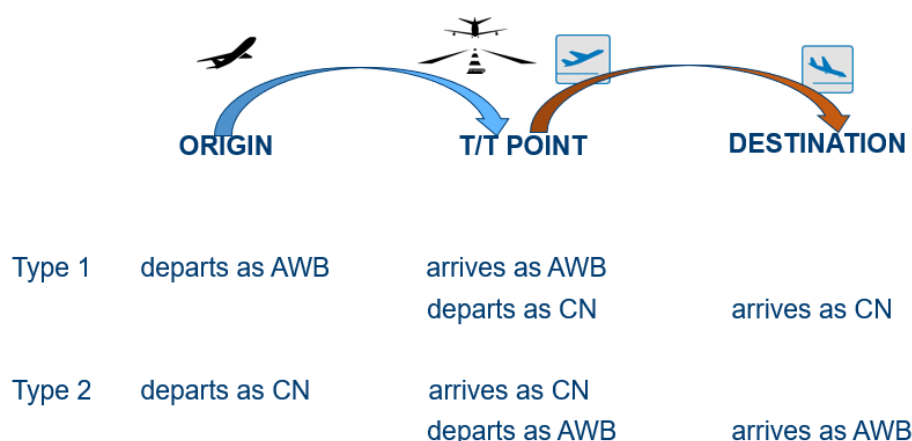|	ORIGIN	TRANSIT	DESTINATION
Type 1	departs as AWB	remains on board arrives as AWB / departs as CN	arrives as CN
Type 2	departs as CN	remains on board arrives as CN / departs as AWB	arrives as AWB

Transit (also known as FROB – Freight Remaining on Board):

Dispatching mail under regulations that differ from those applied upon arrival at the destination, particularly in multi-leg journeys where a switch occurs at the transit point is non-compliant.

This results in inaccurate documentation of the transported goods and may lead to penalties due to the importation of undeclared commodities.

TRANSFER/ TRANSHIPMENT

|	ORIGIN	T/T POINT	DESTINATION
Type 1	departs as AWB	arrives as AWB departs as CN	arrives as CN
Type 2	departs as CN	arrives as CN departs as AWB	arrives as AWB

Transfer / Transshipment:

Dispatching mail under regulations that differ from those applied upon arrival at the destination, particularly in multi-leg journeys where a switch occurs at the transfer or transshipment point is non-compliant.

This leads to incorrect documentation of the transported goods and may result in fines due to the importation of undeclared commodities.

3) **Country A** sends mail to **Country B,** and then **Country B** sends it onward to **Country C** without complying with proper standards.

MAIL CARRIED FROM ANOTHER COUNTRY
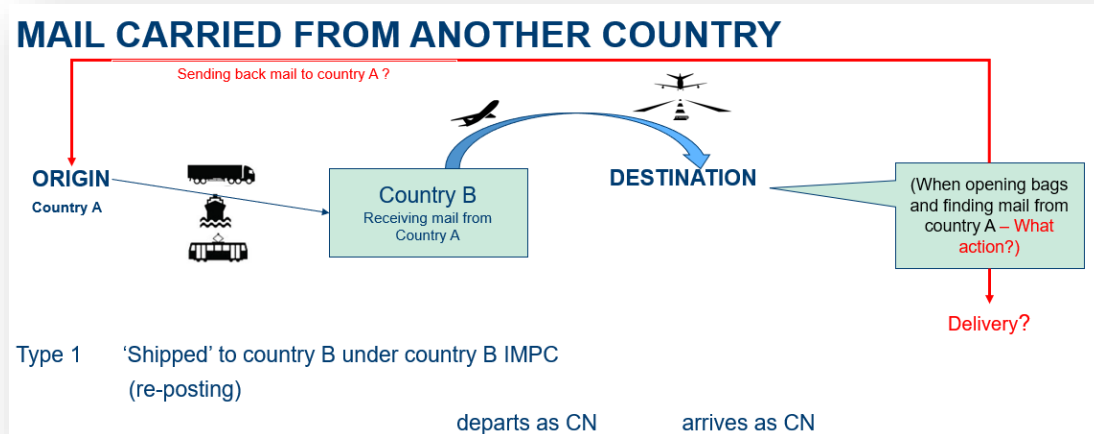
Reposting via another country's IMPC code:
When mail is dispatched using another country's IMPC code and transported from that country to the destination, issues may arise at the destination. Specifically, if the mail is identified and returned, it may be sent to the owner of the receptacle(s), who may not be the original sender. This practice is non-compliant and can lead to operational and accountability complications.

4) **Country A** uses the system and International Mail Processing Centre (IMPC) code of another country to process mail operations.

MAIL CARRIED WITH ANOTHER COUNTRY'S IMPC CODE
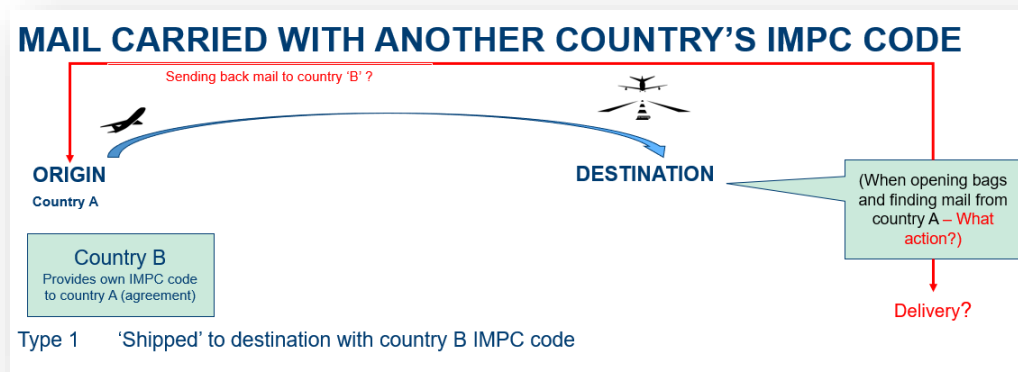
Use of another country's IMPC code:
When mail is dispatched using an IMPC code belonging to a different country, issues may arise at the destination. If the mail is identified and returned, it may be sent to the owner of the receptacle(s), who may not be the original sender. This practice is non-compliant and can lead to misrouting and accountability challenges.

Summary of Risks

From a safety and security standpoint, hybrid scenarios introduce vulnerabilities by mixing processes that follow different screening protocols. Such inconsistencies can lead to gaps in threat detection for prohibited items or dangerous goods. Additionally, the absence of standardized handling procedures in hybrid models can result in unsafe loading practices, mislabelling, and improper segregation of sensitive shipments, increasing risks to aircraft safety and ground personnel.

Regulatory compliance is another concern. Hybrid models risk breaching international frameworks established by UPU and ICAO. These bodies define distinct requirements for customs clearance, security screening, and dangerous goods handling. Blurring the lines between mail and cargo can lead to non-compliance, exposing operators to legal penalties and reputational damage.

From a **liability and contractual** perspective, hybrid scenarios introduce significant uncertainty. When a shipment transitions from one category to another during the journey, it becomes unclear which party bears responsibility for delays, loss, or damage. This lack of clarity complicates dispute resolution and undermines the enforceability of service contracts between airlines, postal operators, and their appointed ground handling agents (GHAs).

Moreover, from **data exchange and traceability** perspective, hybrid scenarios can disrupt the integrity of electronic data interchange (EDI), leading to gaps in tracking and proof of delivery. This not only affects operational performance but also has legal implications for auditability, customer claims, and regulatory reporting.

Additional Points

- **DO NOT** transport a shipment that could fall under various conventions during different legs of transport (for Cargo the Montreal and Warsaw Conventions and for mail the UPU convention).

  Reason: It is because cargo and mail related conventions have different rules and mixing those up could result in fraud, fines or the inability for carriers to assert the applicable liability limitation.

- **Conventions differences in Liability for Loss, Theft, or Damage and Air Mail and Cargo**

  Cargo: On December 28, 2024, the limitation of liability for cargo lost or damaged during international air transportation between countries that are signatories to the Montreal Convention (the "Convention") will increase from 22 Special Drawing Rights ("SDRs") per kilogram to 26 SDRs per kilogram, based on the weight of the package lost or damaged.

  Air Mail: The amount of indemnity referred to in article 21.2.1 of the UPU Convention for the loss of total theft from or total damage to a registered item shall be 30 SDR. The indemnity for the loss of total theft from or total damage to a registered M bag shall be 150 SDR. Charges and fees paid by the sender for posting the item, except for the registration charge, shall be added to these values to determine the total compensation payable. (Article RL 155.4).

- **DO NOT** transport mail as cargo where the CN document is attached as the 'consolidation as per attached list' as this is not compliant due to the fact the list contains the receptacles whilst authorities expect documented pieces of that receptacle.

  Reason: With Cargo one should file the lowest level (XFZB) whereas the Mail lowest level is the ITTMAT and the 'XFZB' level is the receptacle. In cargo XFZB level cannot be a consolidation but the receptacle is a consolidation.

- **Challenges in Transporting Mail as Cargo on AWB**:

  To transport mail as cargo, we need to convert mail messages (ITMATT) into cargo messages (e.g., XFZB/FHL). Currently, this information is not available to carriers.

  There is an existing IATA standard for XFHL where receptacle-level data is allowed. This is the FHL (list) version used for PLACI filing. However, it only relates to mail and provides a list of receptacles within a mail consignment. It does not include the lowest level of detail required for compliance.

  There is no direct carrier-level connection between CARDIT and ITEM messages.

  If mail were handled in the same way as cargo (express), the receptacle level would disappear from the messaging. However, the receptacle still serves as the "container ID" for the individual ITEMs.

Conclusion

The AMB firmly maintains that **hybrid scenarios are not recommended** in air mail operations. The foundational principle is clear and essential for operational and legal clarity.

If a shipment enters the supply chain as mail, it must be handled and delivered as mail; if it enters as cargo, it must remain within cargo processes.

This distinction is critical to ensuring compliance with international legal frameworks and avoiding contractual ambiguity.

The AMB **DOES NOT** support non-compliant and hybrid scenarios models for air mail. This position is based on the need to maintain, safety and security, legal clarity, comply with regulations. Hybrid scenarios pose risks to these key areas and are therefore not recommended in air mail operation.

Glossary

Air waybill (AWB) – Cargo document made out by or on behalf of the shipper which evidences the contract between the shipper and carrier(s) for carriage of goods (excl. mail) over routes of the carrier(s).
Air Mail – Any postal item conveyed in principle by air and with priority. Dispatches of correspondence and other items tendered by and intended for delivery to postal service in accordance with the rules of the Universal Postal Union (UPU).
CARDIT – CARDIT message contains information about a consignment of mail which is handed over to a carrier.
CARGO – means any property carried or to be carried in an aircraft, other than mail or other property carried under the terms of an international postal convention, baggage or property of the carrier; provided that baggage moving under an air waybill (AWB) or a shipment record is cargo.
Carriage – Which is equivalent to the term "transportation". It means carriage of cargo and mail (postal consignment by air, gratuitously or for hire. Mail conveyance of postal consignments from one location to another by air (also used in surface transportation).
Carriers – Includes the airlines issuing the air waybill and creating the shipment record and all other air carriers that carry or undertake to carry the cargo under the air waybill or shipment record or to perform any other services related to such air carriage.
CN documents – CN documents are standardized forms used within the Universal Postal Union (UPU) framework to accompany international mail items. They provide essential information for customs and postal operations. Examples include CN 22 and CN 23 forms, which declare the contents and value of parcels.
Dangerous Goods – Articles or substances which are capable of posing a risk to health, safety, property, or the environment and which are shown in the list of dangerous goods in these Regulations, or which are classified according to the Regulations.
Designated Operator (DO) – Any entity (governmental or private law entity) officially designated by the government of a UPU member country to operate postal services and to fulfil the obligations arising from the Acts of the UPU on its territory, in particular to ensure the acceptance, handling, conveyance and delivery of postal items [UPU Framework for a Service Agreement].
Dispatch – Mail specific term, labelled bag or set of bags or other receptacles sealed with or without lead, containing postal items exchanged between postal establishments.
Extra Territorial Offices of Exchange (ETOE) – An ETOE is defined as an office or facility operated by or in connection with a designated operator on the territory of another country, and that these offices are established by designated operators for commercial purposes to draw business in markets outside their own national territory (UPU Resolution C6/2012).
FROB – Freight remaining on board (see transit cargo).   **Ground Handling Agent(s) –** Organization representing an airline or a designated operator by contract and acting on its behalf to perform all handling activities.
International mail processing centres (IMPC) – Mail processing facility, identified in accordance with UPU standard S34 [16], in which inter-operator mail is processed.
MAL – IATA Special Handling Code of mail.
Postal/Mail Consignment – A postal/mail consignment is a collection of mail receptacles – normally bags, parcels, or trays – that is being transported from one location to another. A consignment is identified by a code up to 12 characters, consisting of the ISO country code and a unique alphanumeric identifier (UPU Standards S32).

Postal Air waybill number (PAWB#) – The PAWB# is to indicate that a postal consignment is using the IATA Air Waybill (AWB) message structure. This is a number in stakeholders' system which can be used for different purposes to allow and/or simplify the industry's procedures and regulatory requirements.
"Postal Operators." See "Designated Operators."
Receptacles – Postal receptacle Mailbag or other container (tray, tub, etc.) used to store mail for the make-up of dispatches.
Transfer Cargo – Movement of cargo and mail from one carrier to another against a transfer manifest.
Transshipment Cargo – The unloading of cargo from one flight and loading onto another for onward carriage.
Transshipment Mail – Direct transshipment; direct airline transfer Transshipment of mails from one aircraft to another without the intervention of the postal administration of the country in which the airport is situated.
Transit Cargo – An enroute stopping place where cargo remains on board.
Transit Mail – Transit Passage of postal items through the services of a third country (UPU).

References

- IATA Airport Handing Manual (AHM)
- IATA Cargo Handling Manual (ICHM)
- IATA Cargo Services Conference Resolution Manual (CSCRM)
- IATA Cargo-XML Toolkit (CXML)
- UPU Convention Manual
- UPU Catalogue of UPU Standards
- UPU Standards Glossary
- UPU Constitution and General Regulations Manual
- UPU Resolution C 6/2012 – ETOE and IMPC