Regulated Agent third country validation process (RA3)

Introduction

The Yemen incidents on 29 October 2010 where an attempt was made to sabotage two cargo aircrafts using explosive devices, has led to many air cargo security discussions. These incidents has proven that the supply chain is as strong as the weakest link. Air cargo transported by air to the EU was accepted as secure cargo, but after the Yemen incidents the EU Commission decided that all EU bound cargo must meet certain criteria in order to be accepted in the EU.

In 2011 and 2012 the EU Commission implemented addition regulations (EU859/2011 and EU1082/2012) for High Risk Cargo and Mail and the ACC3 programme (Air Cargo Carrier third country). In 2013 regulation 654/2013 was implemented for validating the regulated agent third country (RA3) and the known consignor third country (KC3). All these regulations have been replaced in February 2016 by one EU regulation: 2015/1998

Starting July 1st 2014 all air cargo destined for the EU must be transported through an EU Validated Supply chain. Air carriers transporting cargo into or through the EU must receive an ACC3 designation for their Last Point of Departure to the EU. One of the most important criteria is that all cargo destined for the EU must be screened by the ACC3 or comes from an EU Validated Supply Chain.

Air Cargo Secured Supply Chain (ICAO) valid till July 1st 2014

Many countries outside the EU maintain a secured supply chain based on ICAO standards. This means that forwarding agents and ground handling agents (GHA) receive a designation as regulated agent from the Civil Aviation Authority (CAA). Shippers can receive a known consignor status, but this does not happen often. Cargo originated from a known consignor can be accepted as secure cargo by the forwarding agent/ regulated agent.

If there are no known consignors, than all cargo will be accepted as unsecure cargo and must be screened by the forwarding agent. Screening can be done using explosive detection dogs, X-ray equipment, Explosive trace detection, etc. When the forwarding agent cannot screen the cargo, the cargo is delivered as unsecured cargo to the ground handling agent, where the cargo will be screened.

SECURED SUPPLY CHAIN BASED ON ICAO STANDARDS

Shipper	Forwarding Agent	Ground Handling Agent	Air Carrier
Unknown Shipper	Regulated Agent + Cargo Screening	Regulated Agent	Air Carrier

- Forwarding agent in full control of supply chain
- Cargo screening by the Forwarding agents using own screening equipment or outsourced

Unknown Shipper	Forwarding Agent	Regulated Agent + Cargo Screening	Air Carrier

- All cargo delivered by the forwarding agent to the Ground Handling Agent as unsecure cargo

EU Validated Secure Supply Chain valid from July 1st 2014

The EU Validated Secure Supply Chain is in place after the logistic companies (entities) are validated by an approved EU Aviation Security Validator. The forwarding agents can receive RA3 (regulated agent third county) designation and shippers can receive KC3 (known consignor third country) designation directly from the Validator. A forwarding agent and the shipper do not need to be approved by the local CAA on ICAO standards for receiving RA3 of KC3 designation. The RA3 and KC3 designation can only be used for secure transport of cargo to or through the EU.

THIRD COUNTRY EU VALIDATED SUPPLY CHAIN

Shipper	Forwarding Agent	Ground Handling Agent	Air Carrier
known Shipper **KC3**	Regulated Agent **RA3**	Regulated Agent **RA3**	Air Carrier **ACC3**
Unknown Shipper	Regulated Agent + Cargo Screening **RA3**	Regulated Agent **RA3**	Air Carrier **ACC3**

- Forwarding agent in full control of supply chain
- Cargo screening by the Forwarding agents using own screening equipment or outsourced

Unknown Shipper	Regulated agent **ICAO**	Regulated Agent + Cargo Screening **RA3**	Air Carrier **ACC3**

- All cargo delivered by the forwarding agent to the Ground Handling Agent as unsecure cargo

If a forwarding agent (regulated agent approved by local CAA on ICAO standards) does not request a RA3 designation, than all EU bound cargo will be accepted as unsecure by the ground handling agent (RA3), even if the cargo is originated from a KC3 or has been screened by the forwarding agent.

NO RA3 designation for the forwarding agent = NO secure cargo bound for EU
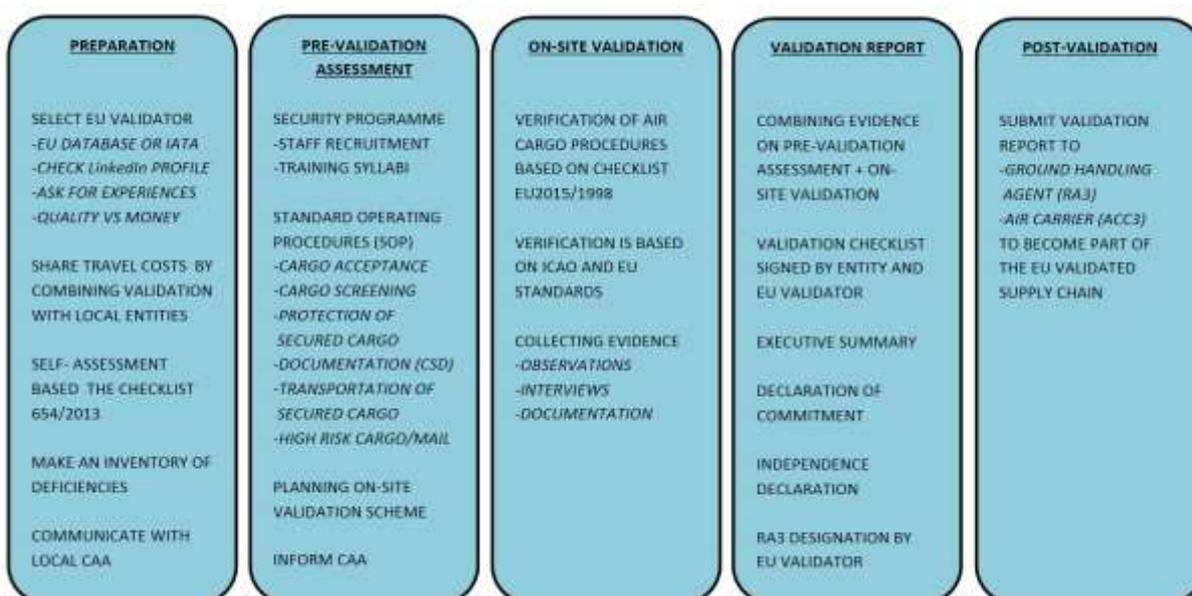
RA3 validation process

In order to receive RA3 designation a forwarding agent or ground handling agent must contact an EU Aviation Security Validator to conduct an on-site validation. All approved EU validators are registered in the EU. It is very important to choose the right validator with the right expertise. After agreement with the Validator the necessary documentation is shared to prepare for a successful validation. After the preparations the on-site validation will take place based on the checklist in EU regulation 215/1998.

If the on-site validation is successful, than the Validator will write a validation report and grant the RA3 designation for 5 years. The validation report of the forwarding agent can be submitted to the ground handling agent (RA3) and the validation report of the ground handling agent can be submitted to the air carrier (ACC3) in order to be a part of the EU validated supply chain.

The validation process can be divided in 5 segments:

PREPARATION	PRE-VALIDATION ASSESSMENT	ON-SITE VALIDATION	VALIDATION REPORT	POST-VALIDATION
SELECT EU VALIDATOR -EU DATABASE OR IATA -CHECK LinkedIn PROFILE -ASK FOR EXPERIENCES -QUALITY VS MONEY	SECURITY PROGRAMME -STAFF RECRUITMENT -TRAINING SYLLABI	VERIFICATION OF AIR CARGO PROCEDURES BASED ON CHECKLIST EU2015/1998	COMBINING EVIDENCE ON PRE-VALIDATION ASSESSMENT + ON-SITE VALIDATION	SUBMIT VALIDATION REPORT TO -GROUND HANDLING AGENT (RA3) -AIR CARRIER (ACC3) TO BECOME PART OF THE EU VALIDATED SUPPLY CHAIN
SHARE TRAVEL COSTS BY COMBINING VALIDATION WITH LOCAL ENTITIES	STANDARD OPERATING PROCEDURES (SOP) -CARGO ACCEPTANCE -CARGO SCREENING -PROTECTION OF SECURED CARGO -DOCUMENTATION (CSD) -TRANSPORTATION OF SECURED CARGO -HIGH RISK CARGO/MAIL	VERIFICATION IS BASED ON ICAO AND EU STANDARDS	VALIDATION CHECKLIST SIGNED BY ENTITY AND EU VALIDATOR	
SELF- ASSESSMENT BASED THE CHECKLIST 654/2013		COLLECTING EVIDENCE -OBSERVATIONS -INTERVIEWS -DOCUMENTATION	EXECUTIVE SUMMARY	
MAKE AN INVENTORY OF DEFICIENCIES	PLANNING ON-SITE VALIDATION SCHEME		DECLARATION OF COMMITMENT	
COMMUNICATE WITH LOCAL CAA	INFORM CAA		INDEPENDENCE DECLARATION	
			RA3 DESIGNATION BY EU VALIDATOR	

I hope that this document has given a better view on the importance and the preparation in becoming an EU validated RA3. If there are any questions, please feel free to contact me for quotations and availability.

Kind Regards,

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