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Middle East Regional Seminar on  
Advance Passenger Information (API) and  
Passenger Name Record (PNR) Data  
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**Aviation Security and Facilitation**



# Developing a Roadmap for Implementation

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## Develop a clear roadmap for implementation

- Identify and include all relevant stakeholders?
  - Civil Aviation
  - Law Enforcement Agencies
- Annex 9
  - Standard 8.20 - Each Contracting State shall **establish a National Air Transport Facilitation Committee**, and Airport Facilitation Committees as required, or similar coordinating bodies, **for the purpose of coordinating facilitation activities between departments, agencies, and other organizations of the State** concerned with, or responsible for, various aspects of international civil aviation as well as with airport and aircraft operators.

## Legislation

- How to legislate?
  - Law
  - Regulation
- Who to legislate?
  - Lead agency
  - Collaboration with Human Rights Agency and Data Protection Authority
- Annex 9
  - Recommended Practice 9.9 — *Each Contracting State developing legislation for the purpose of implementing an API system **should consider developing aligned regulations that meet the needs of all involved agencies**, define a common set of API data elements required for that jurisdiction in accordance with message construction standards and appoint one government agency to receive API data on behalf of all other agencies.*

## Legislation

- Competent Authorities
- Purpose limitations
  - API
  - PNR
- Compliance with International Standards
  - Data Elements
  - Data formats and protocols
  - Data transmission times
- Data Protection
  - Data Subject Rights
  - Oversight mechanisms – internal and external
  - Rules on sharing of passenger data - national and international
  - Alignment with national data protection legislative framework

## Operationalisation of a Passenger Information Unit

- Single Agency PIU
  - Which agency will lead?
  - How will the PIU manage communications with other competent authorities
- Multi Agency PIU
  - Which agency will lead?
  - Identify which other competent authorities will be involved in the PIU
- Databases and Watchlists
  - Which databases and watchlists will the PIU use for the comparison of API and PNR?
  - Internal to PIU or interconnectivity with external databases

## Operationalisation of a Passenger Information Unit

- Practical Considerations
  - Location
  - Facilities
  - Staff
  - Budget – sustainability
- Establish Standard Operating Procedures
  - Practical application of data protection legal requirements
  - Building and System access protocols
  - Role of Data Protection Officer for internal oversight
  - National and International data sharing protocols
  - Processes for watchlist entries
  - Process for RBT set up, testing and review
  - Feedback processes

## Effective Engagement with Airline Industry

- Establishment of engagement mechanism for airline industry
  - National Air Transport Facilitation Committee
  - Airline Operators Committee
  - Board of Airline Representatives
- Understanding the airline landscape
  - Which airlines
  - Where do they fly
  - What systems do they use
  - Relevant contact details for airline and service provider
- Develop guidance materials
  - Based on legislation requirements
  - What data, when, how and what happens when things go wrong?
  - Shared with airlines at least six months before requirement takes effect



## Effective Engagement with Airline Industry

- Identify a pilot airline
  - National carrier
  - Test airline connectivity process
  - Learn lessons
- Use airline landscape information to develop roll out plan
  - Identify high risk routes
  - Identify high passenger volume airlines
  - Identify commonality in system providers used
- Establish Terms of Reference for Carrier Account Management
  - Link between airline/system provider and PIU IT staff for airline – PIU system connectivity
  - Link between PIU and airline for operational and data quality issues
  - Non-compliance handling strategy

## Information Technology

- Direct connections vs Gateway Service Provider (broker)
  - Understand the airline landscape
  - Pre existing IT skills and understanding of airline system connectivity requirements
  - Cost/Benefit analysis
- Selection of Passenger Data Analytical Software Solution
  - Develop in house
  - Off the shelf product
  - International Organisation assistance
- Procurement of Adequate Hardware
- Ensure sufficient IT security protocols to protect data
  - Accidental or unlawful destruction, loss, alteration
  - Unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed

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# Thank You

