

**POSTAL OPERATIONS COUNCIL**
**Issues relating to the Customs Group**
**UPU position paper on EAD flows 3 to 4 of the Global Postal Model**
**Memorandum by the International Bureau**  
(Agenda item 2c)

1 <b>Subject</b>	<b>References/paragraphs</b>
UPU position paper on EAD flows 3 to 4 of the Global Postal Model.	§§ 1 to 20 and Annexes 1 to 5
<b>2 Decisions expected</b>  The Postal Operations Council is invited to review this paper and its annexes, with a view to: <ul style="list-style-type: none"> <li>– approve this document’s principles, suggested solutions and processes as the standard approach to Flows 3, 4, and 4+;</li> <li>– request that the Standards Board complete its development of the ITMREF, REFRSP standards and codes to align with this approach.</li> </ul>	§§ 1 to 20 and Annexes 1 to 5

**I. Introduction**

1 Following on from the work of the joint WCO–UPU expert team on electronic advance data (EAD) flows 3 and 4 of the UPU Global Postal Model (GPM), this document seeks to provide a conceptual overview of flow 3, 4 and 4+ processes that could be used by the origin designated operators (DOs) to respond to referrals. Section II gives a high-level overview of the activities associated with GPM flows 1, 2, 3, 4 and 4+. Section III covers the principles and parameters associated with the issuance of referrals, as well as the principles guiding response activities implemented by stakeholders at origin in reaction to those referrals. Finally, section IV of this document goes into more detail on the origin’s operational protocols associated with flow 4+ procedures in response to the different kinds of referrals received.

2 Flows 3, 4 and 4+ of the UPU GPM provide the framework for exchanges related to pre-loading advance cargo information (PLACI) risk assessment in the UPU global postal supply chain. One of the key questions in the implementation of PLACI relates to the need for the origin DOs to provide destinations with sufficient time to conduct pre-loading security risk assessment. A reference “referral-wait” timeframe of up to 120 minutes following ITMATT transmission is proposed in Annex 1 to this document.

3 The Joint WCO–ICAO Guiding Principles for PLACI (JWGACI-GPP) (POC C 1 CG WCO–UPU CC 2019.1–Doc 5c) provide that, except in the case of a “do not load” message being issued, cargo keeps moving through the supply chain during the PLACI process. Article 8, paragraph 2, of the UPU Convention indicates that any security measures applied in the international postal transport chain must be commensurate with the risks or threats that they seek to address, and must be implemented without hampering worldwide mail flows. The European Union (EU), in its Common Technical System Specifications for the ICS2 (Import Control

System 2) PLACI system, defines as optional the receipt of its “assessment complete” message by economic operators (DOs would fall in this category).

4 For analysis of flows 3, 4 and 4+ responses, the following stakeholders would need to be most directly involved in the process:

- Origin DOs
- Origin Customs and/or registered screening agents
- Destination DOs
- Destination Customs and/or border security authorities
- Other stakeholders involved in the origin national emergency responses (airlines, national civil aviation authorities, ground handling agents, customs brokers, general sales agents, etc.)

5 For simplicity, the following terminology is used in this document:

- UPU Global Postal Model for use of EAD for security purposes: GPM
- Designated operator in the origin country: origin DO
- Customs authority in the origin country: origin Customs
- Designated operator in the destination country: destination DO
- Customs authority (and/or security authority) in the destination country: destination Customs

## II. Overview of the activities associated with GPM flows 1, 2, 3, 4 and 4+

6 The following functions are performed:

- Flow 0: For mail items containing goods or subject to customs control, the origin DO captures the data from the CN 22/CN 23/CP 72 customs declaration form used by the sender of the mail item. This form may be provided to senders on an electronic system (kiosk, tablet, mobile app) to facilitate data capture. Whether handwritten or printed and affixed to the item, the customs declaration form must be filled and signed by the sender, in accordance with article 20-001 of the Convention Regulations.
- Flow 1: The origin DO transmits an ITMATT (ITeM ATtributed) message to the destination DO as soon as possible, at least two hours before the items would be scanned into receptacles for eventual dispatch.
- Flow 2: The destination DO receives the ITMATT and relays the data (via CUSITM (CUSToms ITeM) or its local equivalent) to destination Customs. In parallel, destination DOs (and/or electronic data interchange (EDI) networks) may seek to provide an ITMATT receipt notification function to the origin DOs.
- Flow 3: Destination Customs analyzes the data and within two hours (timing rule discussed later) issues one of the following (via CUSRSP (CUSToms ReSPonse) or its local equivalent) to the destination DO:
  - a An assessment complete message (AC or UPU code ASC) indicates that the initial risk assessment has been conducted at the destination. This is an optional message and does not constitute a guarantee of no risk associated with the item.
  - b The customs referral message request for information (RFI) indicates that destination Customs requests information related to the item to be able to complete initial risk assessment.
  - c The customs referral message request for screening (RFS) indicates that destination Customs requires additional screening of the item to determine if a risk to aviation security exists, as it is not possible to determine risk with the information available (JWGACI-GPP).
  - d The customs alert message do not load (DNL) indicates an imminent threat to aviation security (i.e. representing a “bomb-in-the-box” scenario only). In accordance with ICAO Annex 17 requirements, members must have existing protocols in place to address an imminent threat to aircraft presented by an air cargo shipment. These protocols can be leveraged by authorities in the context of PLACI (JWGACI-GPP).
- Flow 4: The destination DO relays these messages back to the origin DO via ITMREF (ITeM REFerence).

- Pre-flow 4+ – Activities undertaken by the origin DO:
  - Step 1: The origin DO should allow sufficient time for its information technology systems to receive and load the destination DO's ITMREF message (containing codes such as AC, RFI, RFS, or DNL) and for the ITMREF codes to be loaded into the origin DO's dispatching systems.
  - Step 2: Before placing an item into a mail receptacle for dispatch, especially in cases where data is captured at the office of exchange, the origin DO processing staff must first scan each item's identifier to determine whether the item can be included in the receptacle, or whether it must be held out because an action is requested from the destination:
    - If the item has attracted an RFI, RFS or DNL referral, the item will need to be held out from the standard dispatching operations until the appropriate response protocols have been implemented. (This will be discussed in further detail in section IV.)
    - If the item has received an AC code, it is eligible to be added to the mail receptacle intended for dispatch, and subject to subsequent routine dispatching operations.
    - If the item has not received an AC code, but sufficient time (e.g. 120 minutes) has elapsed since flow 1 (ITMATT transmission), the absence of an RFI, RFS or DNL referral may be interpreted as a "derived AC" by the origin DO, and hence the item is eligible to be added to the mail receptacle intended for dispatch, and processed per standard screening and dispatching operations. Annex 1 proposes a reference timeframe.
  - Step 3: For those items attracting referral messages of RFI, RFS or DNL, the origin DO must ensure that the item has been held out from the receptacle, and instead of dispatching it, it is redirected into the origin DO's other processes established for the appropriate action to address these types of referral messages. These processes are addressed in greater detail in section IV.
  - Step 4: Those items that were held out for additional measures to resolve their referral issues will undergo resolution processes (addressed in greater detail in section IV). On the conclusion of those measures, the origin DO prepares a REFRSP (REFerral ReSPonse) message to communicate the results of the measures it has taken and the current status of item.
- Flow 4+: The origin DO transmits the REFRSP message to the destination DO. In the absence of a punctual AC message, the origin DO must wait sufficient time before dispatching (e.g. 120 minutes) to check if those items that had initially attracted an RFI or RFS are now eligible for traditional dispatch processing. The origin DO may procedurally opt to hold for an additional time (e.g. two more hours) those items that had initially attracted an RFS but successfully passed high-risk screening. This would minimize the risk of having to react to potential DNL arriving after the item had been returned to the original processing operations and scanned into a mailbag for dispatch.
- Flow 4++: The destination DO relays the origin DO's REFRSP data to destination Customs (via CUSITM (CUSToms ITeM) or its local equivalent), for the destination Customs to complete the initial PLACI risk assessment process. Note that upon receipt of an RFS, the origin DO should confirm what screening has already taken place and/or carry out the requested screening, where necessary, as per ICAO Annex 17 regulations and/or applicable national cargo security programme measures (JWGACI-GPP).

### **III. GPM guiding principles and parameters associated with the destination issuance of referrals and the responses required of the origin**

7 This section lays down the general principles in the GPM that guide the parties' conduct for using destination analysis of EAD as an extra layer of screening for security purposes – more specifically, its purpose of supplementing traditional security screening procedures.

- a Under the UPU GPM, the analysis of EAD by destination Customs supplements the origin DO's screening activities for security purposes. This is not designed (nor intended) to facilitate fiscal-related processing at origin by the destination parties.
- b The core information in EAD to be analyzed by destination Customs for these security reasons is the 7+1 PLACI data elements (JWGACI-GPP). Consequently, any RFI issued on an item's data would be expected to concern anomalies with the 7+1 data. If destination Customs issues RFIs to the origin DOs to seek other types of information, it should be strictly limited to information relevant to PLACI risk assessment (JWGACI-GPP). An RFI should never seek information that might be needed for destination internal fiscal processing of duties or taxes.

- c The approach to how a destination analyzes EAD for security purposes must also be balanced with another key goal: ensuring a facilitated flow of mail and avoiding creating unnecessary barriers to cross-border traffic. The act of responding to destination Customs' requests for more information or additional (high-risk) screening requires more work processes for the origin and will slow down or impede the export process. Consequently, it is important to rely on pragmatic measures such as timing rules and risk management to ensure the flow of mail from the origin is not unduly hampered by a process intended primarily to supplement the traditional methods of security screening used at origin.
- d DOs expect destination Customs to apply the ICAO–WCO PLACI principles of risk management in their analysis of EAD for security purposes. DNL referrals, indicating imminent threats to aviation security, would be expected to be extremely rare, representing a “bomb-in-the-box” scenario only (JWGACI-GPP). Risk management should also serve as guidance on what can reasonably be requested for issuance of an RFI, or to what an RFS would be deemed as an extra measure to traditional screening. The flow of mail and the operational processes of origin DOs would experience significant challenges if faced with responding to large numbers of items attracting RFI and/or RFS referrals.
- e EAD risk assessment by destination Customs is intended to supplement the origin DO's screening activities. Consequently, the issuance of an RFS referral cannot take precedence over an origin's national screening policy and standards for items of higher risk. The screening should take place as per ICAO Annex 17 regulations and/or applicable national cargo security programme measures (JWGACI-GPP). Therefore, the ability of an origin DO to comply with an RFS is guided by what the origin's national screening policy and standards for higher risk items have required of the origin DO. As a pragmatic approach (and a jurisdictional one), referrals in the GPM should not dictate that the origin DOs have to maintain a series of different screening methods for each destination country.
- f Issuance of “assessment complete” (AC) by destination Customs/security authorities is not a guarantee to the origin DO that there is no risk in dispatching the item (POC C 1 CG WCO–UPU CC 2019.1–Doc 5d). Rather, an AC code indicates that the 7+1 data was initially risk-assessed and no advisory referrals have been issued currently, implying essentially that the loading of items is in every case at the DO's own risk. So the GPM system of responses must allow the origin DO, while mindful of the advisories it has received, the ability to employ its own risk management strategies and procedures on what can be loaded. The one exception to this is the DNL scenario.
- g Under a risk management approach, the GPM needs to be reasonable in what it expects the origin DO can do in reaction to late-arriving referrals. Attempting to retrieve an item attracting a late referral, especially after it has already been dispatched (and accepted by the airline) would result in the disruption of several entities' supply chain and transport operations. Consequently, a late arriving RFI or RFS should not trigger the emergency responses or protocols that would take place for a late arriving DNL. Under the GPM, for an already dispatched item attracting a late-arriving RFI or RFS, the origin DO would make a reasonable effort to intercept the referred item for additional screening if it was still readily retrievable in the origin DO's own processing system.

#### **IV. GPM procedures for responding to items attracting referrals**

8 This section provides greater detail on the procedures that the origin DO would take in regard to referrals received from the destination Customs.

##### *a AC message (assessment complete)*

9 The AC message is the most straightforward result received from destination Customs. A Business Process Map (BPM) is provided in Annex 2. The key issues related to AC messages are:

- i Irrespective of whether destination Customs plans to transmit the optional AC message for all items, the principle that mail keeps moving through the supply chain during the PLACI process should be followed (JWGACI-GPP).
  - If destination Customs does not transmit AC, the origin DO can assume that the item is clear to load, provided sufficient time (e.g. 120 minutes) has elapsed and no referral has been issued.
  - If destination Customs has opted to provide an AC code for all pre-advised items, then the origin can load the item after the actual arrival of the code. If the AC has not been received, the origin DO should wait sufficient time (e.g. 120 minutes), before assuming there are no open referrals and processing the item through the standard dispatching procedures.

- ii Clarity of policy from the destination customs authority on what an origin DO receiving an AC (actual or derived) can assume as regards guarantees that this is deemed safe to load (see § 7f).

*b DNL message (do not load)*

10 The DNL message is another straightforward result from destination Customs' analysis of the 7+1 pre-advice dataset provided, pre-loading, by the origin DO in GPM flow 1. The DNL always constitutes an imminent threat to security and an emergency alert: a potential "bomb in the box" (JWGACI-GPP). Emergency procedures must be followed in accordance with the origin's rules and aviation protocols for this situation.

- / 11 The BPM provided in Annex 3 simplifies the emergency response interactions between the origin DO and origin Customs/security entities, as they would be covered by national aviation security protocols following ICAO's Annex 17 (JWGACI-GPP). As these standards for emergency protocols are already in place, the GPM does not attempt to dictate such action. Rather, the focus in this document is on:

- i how the origin would receive this DNL alert from the destination;
- ii how the origin DO would detect the DNL; and
- iii how the origin DO would advise the destination once the issue had been resolved.

12 The key issues are:

- i DNLs should be extremely rare (see § 7d), representing a "bomb-in-the-box" scenario only. When approaching this risk threshold, the question needs to be asked whether an RFS would be the reasonable first step. Naturally, there may be situations where DNL is completely called for based on other intelligence; however, it must also be understood that high-risk screening processes are also well designed, with emergency protocols built in.
- ii The GPM indicates how the DNL message would be relayed back to origin in an ITMREF message. Naturally, there are other emergency communication protocols available for this type of emergency; however, any Customs-to-Customs communication falls outside the scope of this document. Rather, this document would need to emphasize how the origin information systems would route a DNL message to appropriate security stakeholders in the origin DO's alert systems and in how those systems are connected to the origin Customs/security systems.
- iii The origin DO must communicate its resolution of a DNL to the destination DO with an "export cancelled" message, via REFRSP, so the destination entities can close out this alert. (Other communication, such as an EMSEVTv3 EXX event, may occur, but that is outside the scope of this document.)

*c RFS message (request for screening)*

13 After analysis of the 7+1 data elements of an item, destination Customs may decide the item is questionable enough to pose a potential risk and needs additional screening. Destination Customs issues an RFS code on the item to request a high-risk screening procedure at origin on the item (JWGACI-GPP).

- / 14 The BPM in Annex 4 shows the origin DO's options for responding to an RFS after it has identified and intercepted the item. If the origin decides to continue with the export of this item, it must then redirect the item for high-risk screening. (Some DOs may use their Customs, others may use a screening agent.) If the item fails screening, then the item is removed from the mail stream ("export cancelled" issued in REFRSP) and undergoes the origin's protocols. If the item passes, the code indicating it has passed high-risk screening is issued in a REFRSP message and the item is returned to queue up for traditional dispatching operations.

15 The key issues are:

- i As mentioned in § 7d, PLACI risk management principles are expected to guide the issuances of RFS (JWGACI-GPP). This should take into account the additional processes RFS requires of the origin and the challenges posed by requesting RFS too frequently for minor issues, namely, hindrance of the flow of cross-border mail. At destination Customs, consideration must therefore be given, before issuance of an RFS, to what types of situations the analysis of 7+1 data could require these extra measures. Naturally, there may be situations where RFS is completely justified, but for minor issues, an RFS may not be needed (incorrect postcode, etc.).

- ii An RFS may be issued (per timing rules) in follow up to the origin's provision of the additional 7+1 information, requested in an earlier RFI.
- iii However, origin would not expect an RFI subsequent to an RFS, where the origin has communicated (via REFRSP) that it has conducted and passed high-risk screening and applied national mail and cargo security measures with the appropriate authorities, with the item being exported. At this stage, the only two expected actions from the destination Customs would be AC or DNL (based on some new late-arriving evidence that this item poses an imminent threat).
- iv Coding on the RFS message should allow destination Customs to advise/recommend a certain type of high-risk screening, but it is the origin's national security authorities that, following ICAO Annex 17 regulations, determine how high-risk screening procedures are performed (JWGACI-GPP).
- v If an RFS is issued by destination Customs, the origin DO does not have the option to export the item and forego high-risk screening. The air carrier may refuse to load a shipment for which the destination has requested RFS and high-risk screening was not performed.

*d RFI message (request for information)*

16 After analysis of an item's 7+1 data elements provided from the origin in GPM flow 1, destination Customs may decide that the data provided is incomplete or erroneous. Destination Customs issues an RFI code on the item to request the origin to provide the amendments required for conducting PLACI risk assessment of the 7+1 data, in order to determine whether the item poses a risk to aviation security.

/ 17 The BPM provided in Annex 5 reflects the origin DO's options in its responses to an RFI, and what consequent actions it might have to take in regards to follow-up codes from destination Customs, in reply to the information it had provided in its REFRSP message. The very complexity of this process map indicates a need by all parties to avoid generating many RFI messages and to find options that streamline the process.

18 The key issues are:

- i As mentioned in § 7a, as GPM data is provided for security purposes, RFI messages would be limited to requests for information on the 7+1 data elements to ascertain risk of the "bomb-in-the-box". RFI shall not be used to request from origin other information that a destination Customs might wish to have for facilitating its fiscal or other processing (i.e. assessing duties and taxes, etc.).
- ii As mentioned in § 7d, PLACI risk management principles should guide the issuances of RFI to avoid hindering the flow of cross-border mail, which is already undergoing traditional screening. Therefore, destination Customs must consider -- before issuance of an RFI -- what types of situations the analysis of 7+1 data could exceed a "reasonable risk" threshold to the point where the item might be deemed high-risk due to faulty or missing 7+1 data. Naturally, there may be situations where RFI is completely justified, but RFI may not be needed for all cases (e.g. incorrect postcode, etc.).
- iii Origin DOs should allow sufficient time (e.g. 120 minutes) after transmitting the RFI response (via REFRSP) to the destination Customs. This allows time for the destination customs to issue either an AC, RFS or DNL, and for those codes to be received into the origin DO's IT systems.
- iv The map also includes additional options for the origin DO, should it not be able to provide updates/amendments on the 7+1 information as was requested by destination. These are:
  - Indicating that the data is not available (but processing continues), after sufficient time (120 minutes) has elapsed and no further requests have been received.
  - Cancelling the export, (for the item/s concerned), where data is clearly incomplete and not retrievable.
  - Where the DO of origin has the possibility, in coordination with its aviation authorities and/or Customs, conducting high-risk screening in lieu of amending the 7+1 data.
- v No subsequent RFI would be expected by the origin after it has communicated in a REFRSP that an item has successfully passed high-risk screening and is deemed eligible for export.

## **V. Conclusion**

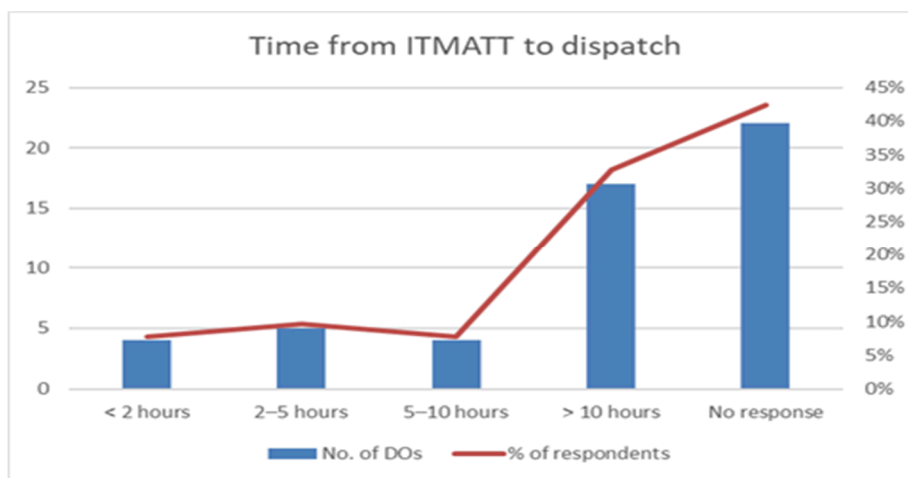
19 This document was developed to provide a framework for approaching GPM flows 3, 4 and 4+. Specifically, it seeks to lay out the options and expectations of all the parties involved in a GPM procedure that uses destination customs analysis of EAD as an extra layer of screening for security purposes. The emphasis (with the exception of a DNL which is in a different category owing to the need to urgently address the issue) is on EAD as a facilitator for improved targeting in the physical screening process, rather than an exercise in 7+1 data quality before an AC is granted.

20 Analytics of EAD data by destination Customs can be a useful tool for risk assessment beyond aviation security, but the framework, approach and process map for GPM flows 3, 4 and 4+ focuses on PLACI requirements, so as to avoid hampering international mail flows at the origin.

### Timing Reference for How Long Origin DO Waits for Responses/Referrals from Destination Customs

1 For items which data is captured at offices of exchange, a maximum of two hours between ITMATT transmission and item dispatch was the initial hypothesis as to the time needed to ensure a smooth PLACI process without hampering international mail flows. In the framework of the joint WCO–UPU expert team, an online survey was conducted to understand the efforts being made by the origin Post in referral response times. The first question of this survey showed that 92% of DOs were currently transmitting ITMATT more than two hours ahead of dispatch, supporting the initial hypothesis from a postal perspective.

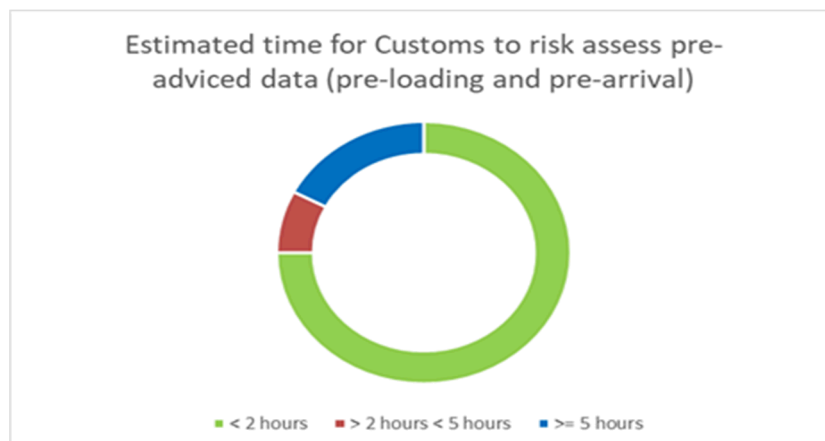
Q1. On average, approximately how much time elapses between transmission of an ITMATT message for a mail item subject to customs control and physical dispatch of the mail item?



2 To better assess parameters for a timing rule, a question was posed to those Customs administrations using Pre-Loading Advance Cargo Information (PLACI) perform automated risk assessments on the pre-advised data received. In most cases, the initial assessment is completed within minutes of receiving the data.

3 Below are the results of question 2, providing an estimate for the time required by customs administrations to conduct an initial advance risk assessment for a mail item. This was estimated by 75% of respondents to be less than two hours, supporting a recommended timeframe of two hours from ITMATT to dispatch.

Q2. How much time do you estimate that your customs administration will need, on average, to complete advance risk assessment for a mail item, once the pre-advice data has been received (flow 2: CUSITM/equivalent)?



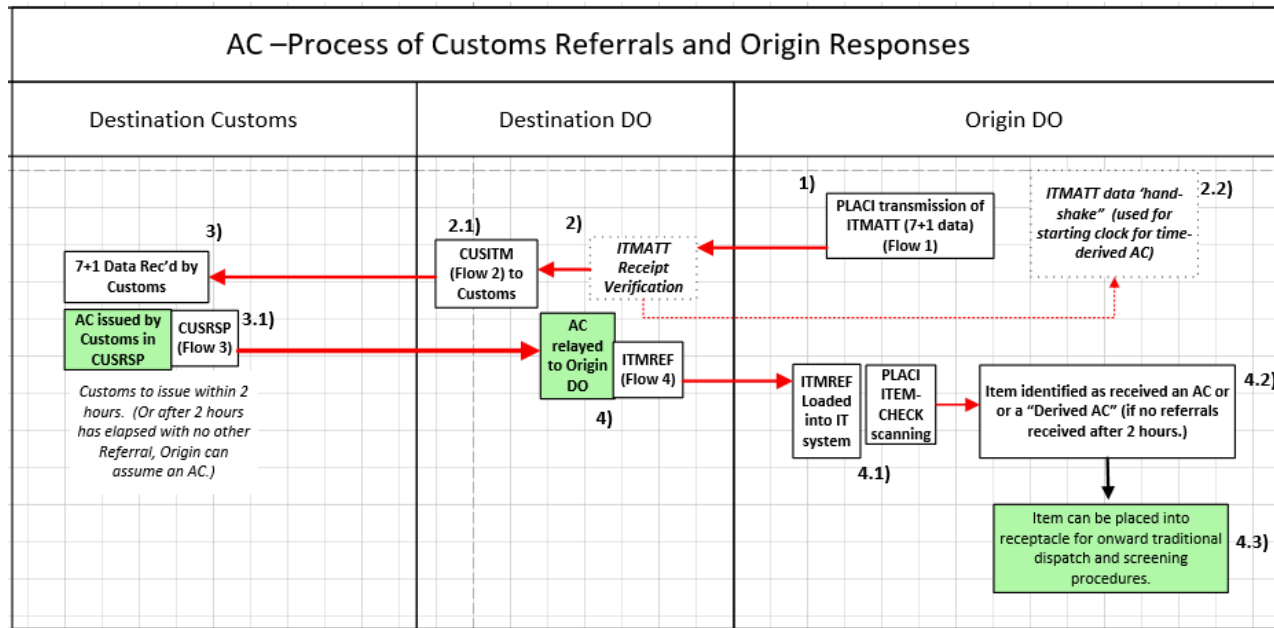


- 6 Different timelines for data transmission should be considered depending on the type of flow:
- a. B2C (business-to-consumer) e-commerce and B2B (business-to-business) data shall be transmitted as soon as available. In these cases, ITMATT messages can be transmitted at the time the mail item enters the global postal supply chain.
  - b. C2C (consumer-to-consumer) and C2B (consumer-to-business), ITMATT data can be transmitted from the collection point/post office at the earliest and from the outbound office of exchange at the latest.

7 In cases where the ITMATT data is transmitted late in the origin postal supply chain between the time of acceptance from the customer up to the time of arrival at the outward office of exchange, the Origin DO should hold the mail items for a recommended period of two hours prior to attempting their dispatch, without hampering mail flows.

8 In the absence of the actual issuance of an assessment complete (AC), one can be derived by timing rules which is as follows: the absence of any customs referral, more than two hours, after the information had been transmitted from origin, can be considered the origin designated operator as a 'derived' assessment complete.

## Business process map to Assessment Complete messages



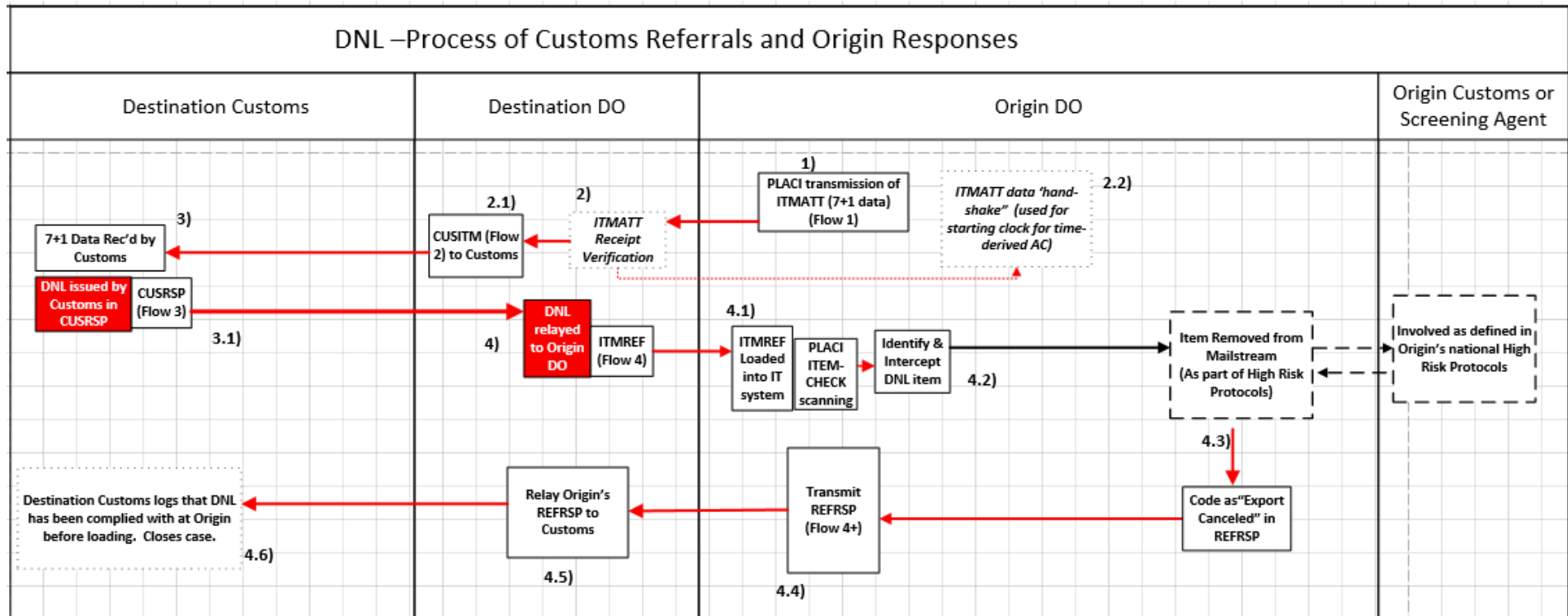
The proposed ITMATT receipt verification would be an optional function for destination DOs under a PLACI regime (or EDI networks), to provide confirmation that the ITMATT for X number of records was sent. It would constitute an acknowledgement that the ITMATT message was received for all records sent by the Destination DO, as well as a time reference for the origin to give sufficient time to the Destination country's initial PLACI risk assessment process, without hampering mail flows.

Origin DO must wait sufficient time (two hours are proposed as a reference) to allow for origin DOs IT systems to have received and loaded the Destination DO's ITMREF AC message and made accessible to Origin DO's dispatching scanning systems.

Before placing an item into a mail receptacle for dispatch, Origin DO processing staff must first scan each item's identifier to determine whether the item can be included in the receptacle or must be held out in case any other action is needed.

For this scenario the item has an AC code (or a derived AC since sufficient time has elapsed) so it is eligible to be added to the mail receptacle intended for dispatch, and subject to subsequent standard dispatching and screening operations further on in the process.

**Business process map to Do Not Load (DNL) referrals**



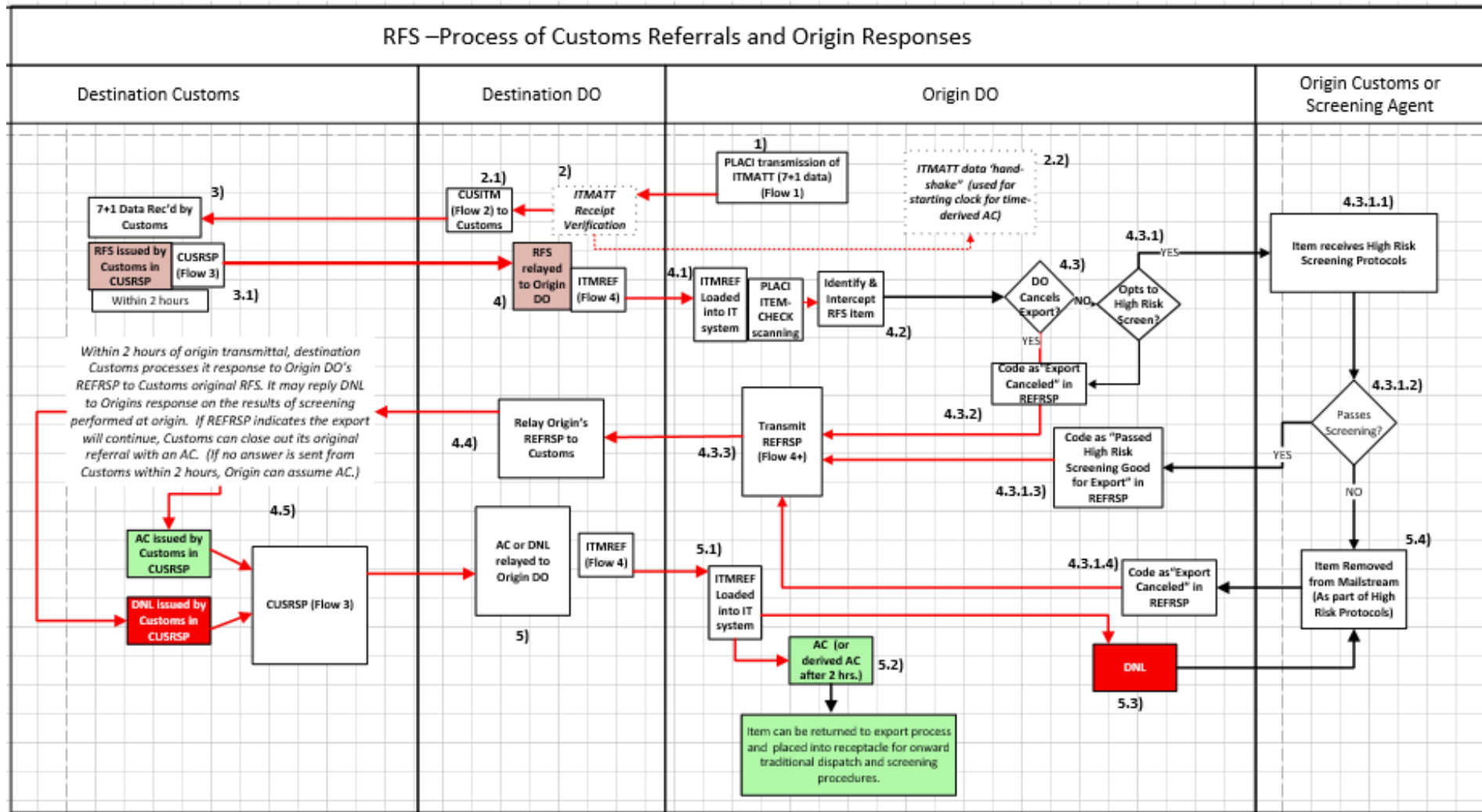
This map represents the minimum standard of GPM's responses to a DNL. It assumes the Origin DO's systems do not have a way to relay a DNL to its managers responsible for aviation security, and as such the dispatching staff scanning the items would be the first to know about the DNL. It is not likely this scenario would occur – especially since most origins have internal protocols for this type of issue. However, GPM only flag the need for operational systems to relay a DNL to the relevant authorities.

Before placing an item into a mail receptacle for dispatch Origin DO processing staff must first intercept scan each item's identifier to determine whether the item can be included in the receptacle or must be held out because if other action is needed.

Upon scanning a DNL, the dispatching staff's first procedure would be to alert their managers, who will undertake the execution of origin's emergency protocols, coordinating with their national aviation security authorities and airlines.

Once the emergency protocols are completed, and the risk has been removed from the supply chain, the origin DO should inform the destination through an "Export cancelled" REFRSP message. (It is anticipated there will be other communications, but those are outside the scope of this document.)

Business process map to Request For Screening (RFS) referrals



After confirmation of ITMATT transmission, the Origin DO must ensure sufficient time has elapsed (i.e. 120 minutes) before performing any pre-loading scanning of items. This is needed to allow for origin DO's systems to have received and loaded the Destination DO's ITMREF message with the RFS.

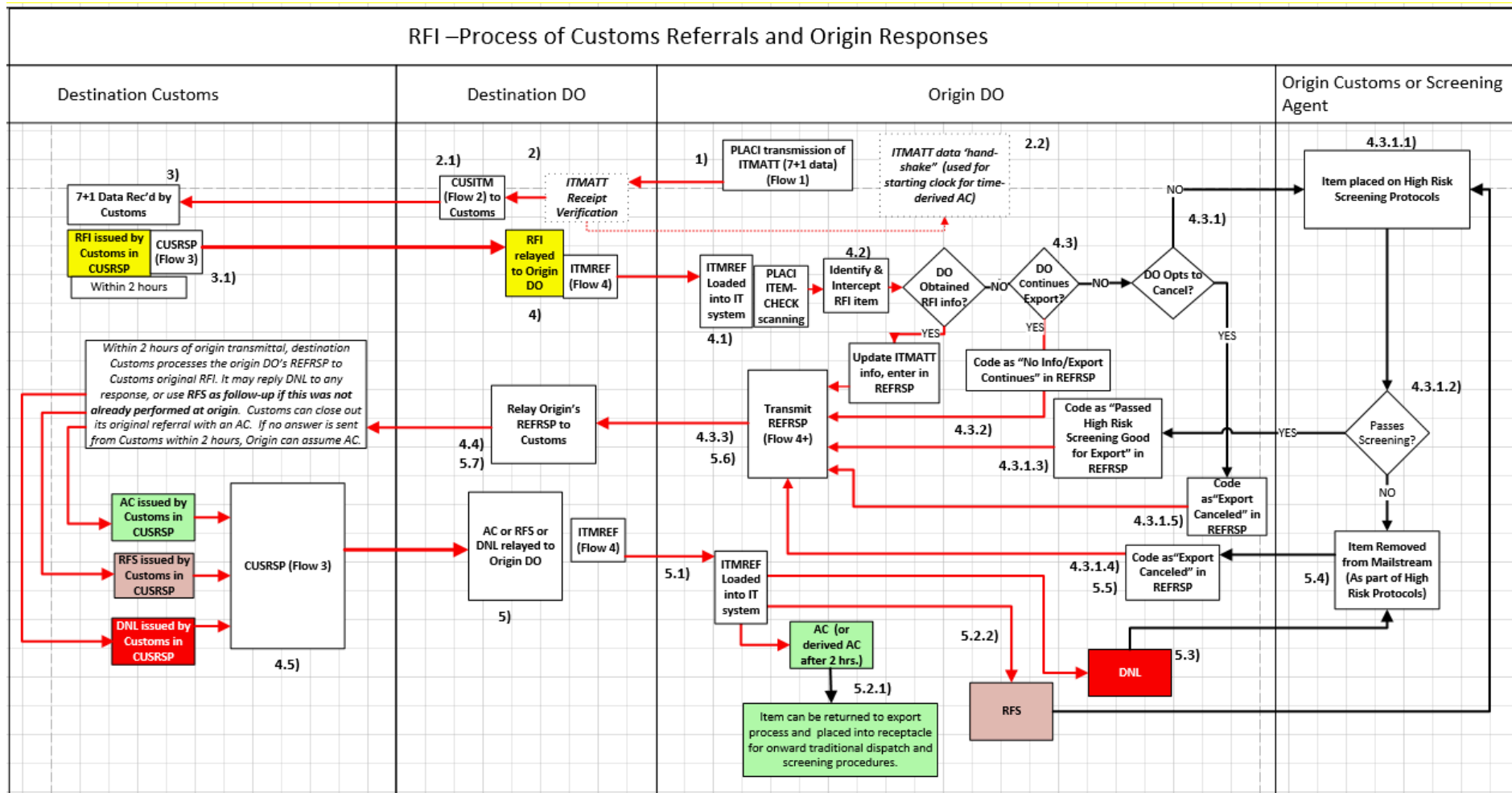
Before placing an item into a mail receptacle for dispatch Origin DO processing staff must first scan each item's identifier to determine whether the item can be included in the receptacle or must be held out because if other action is needed.

Upon scanning the RFS, the dispatching staff are to intercept the item, and hold it out. The item is redirected to the registered agent, customs, or other entity charged with performing high-risk screening. The Origin DO may also opt to cancel the export and return the item to the sender.

The RFS Item is subject to high-risk screening measures, as dictated by the Origin's national security screening standards and procedures (JWGACI-GPP)

- I. If item fails screening – national emergency procedures are undertaken, the item is removed from the mail-stream, and an "Export Cancelled" message is transmitted by Origin DO to Destination (via REFSRP).
- II. If the item passes, a "Passed High Risk Screening, Proceeding with Export" code is transmitted by Origin DO (via REFSRP) to destination. For this case, the Origin must allow sufficient time (e.g. two hours) before returning the item into the standard dispatching team, for Destination Customs to respond as required (e.g. with an AC or DNL code).

## Business process map to Request For Information (RFI) referrals



After confirmation of ITMATT transmission, the Origin DO must ensure sufficient time has elapsed (i.e. 120 minutes) before performing any pre-loading scanning of items. This is needed to allow for origin DO's systems to have received and loaded the Destination DO's ITMREF message with the RFI.

Before placing an item into a mail receptacle for dispatch Origin DO processing staff must first scan each item's identifier to determine whether the item can be included in the receptacle or must be held out because if other action is needed.

If an item's scan results in a RFI, the dispatching staff are to intercept the item, and hold it out. The item is redirected to Origin DO's processes for resolving the RFI. As an option, the Origin DO may opt to simply 'cancel the export' and forego attempting to resolve the problem.

If the Origin DO decides to resolve the RFI they have the following options:

- a. Amend the errors in initial 7+1 data, or supply the missing 7+1 data. If this is possible, provide the information in REFRSP and allow sufficient time for destination customs response.
- b. Decide to substitute High-risk screening in lieu of amending the 7+1 data. If RFI item passes high-risk screening, transmit a "Passed High Risk Screening, Proceeding with Export" code via RESRSP to destination. If the item falls high-risk screen, it should be removed from mail-stream, and the Origin should Transmit an "Export Cancelled" code in REFRSP to destination.
- c. Indicate to destination with a code in REFRSP that data was not available to comply with the RFI; and the Origin DO is proceeding with the export after sufficient time (120 minutes) has elapsed and no further requests have been received.

The Origin DO should allow sufficient time (e.g. two hours) for the destination to respond its REFRSP:

- a. If the former RFI item receives an AC code (or a derived AC) it is eligible to be added to the mail receptacle intended for dispatch, and subject to subsequent standard dispatching.
- b. If the item receives an RFS code, it would be handled as per the RFS procedures.
- c. If the item receives a DNL code, it would be handled as per the DNL procedures.
- d. In the UPU GPM, origin would not expect a follow-up RFI to the original RFI, if questions still persist, an RFS would be more appropriate from an operational handling perspective at origin.