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ANNEX

ANNEX

to the

COMMISSION IMPLEMENTING REGULATION

**amending Implementing Regulation (EU) 2015/1998 as regards certain detailed
measures for the implementation of the common basic standards on aviation security**

ANNEX

The Annex to Implementing Regulation (EU) 2015/1998 is amended as follows:

- (1) in the list in Attachment 3-B, the following entries are deleted:
“Greenland, in regard to Kangerlussuaq airport
Guernsey
Isle of Man
Jersey
State of Israel, in regard to Ben Gurion International Airport”;
- (2) in the list in Attachment 4-B, the following entries are deleted:
“Greenland, in regard to Kangerlussuaq airport
Guernsey
Isle of Man
Jersey
State of Israel, in regard to Ben Gurion International Airport”;
- (3) in the list in Attachment 5-A, the following entries are deleted:
“Greenland, in regard to Kangerlussuaq airport
Guernsey
Isle of Man
Jersey”;
- (4) in chapter 6, points 6.0.7 and 6.0.8 are added as follows:

“6.0.7 For the purposes of this Annex, a ‘business relationship’ means an association between natural or legal persons engaging in an agreement involving the performance of operations such as the delivery, acceptance, processing, handling, loading, off-loading and transport of air cargo or air mail.

6.0.8 For the purposes of this Annex, an ‘established business relationship’ means:

 - (a) a business relationship established before 1 September 2024; or
 - (b) a business relationship established after 1 September 2024, whereby the regulated agent has requested, obtained and retained the following information or documentation from the shipper or consignor, or from the freight paying consignee, as applicable:
 - personal, business or corporate information, including name, address, phone number and email address;
 - payment information, such as bank account or traceable credit card number;
 - VAT number, company registration certificate, if applicable;
 - a contractual agreement.”
- (5) in chapter 6, point 6.3.2.1 and 6.3.2.2 are replaced by the following:

“6.3.2.1 When accepting any consignments, a regulated agent shall:

- (a) establish whether the entity from which it receives the consignments is a regulated agent or a known consignor or neither of those;
- (b) examine the exterior of any consignments received, including consolidations, for signs of interference, tampering with or any anomalies that may raise suspicion.

6.3.2.2 The regulated agent shall ask the person delivering any consignments to present an identity card, passport, driving licence or other document, which includes his or her photograph and which has been issued or is recognised by a national authority. The card or document shall be used to establish the identity of the person delivering the consignments.

Failure in presenting a valid document establishing the identity of the person delivering the consignments shall result in the rejection and marking of the consignments and the accompanying documentation in accordance with point 6.1.3, or in the obligation to apply the additional provisions laid down in the Annex to Implementing Decision C(2015) 8005.”;

(6) in chapter 6, point 6.8.3.2 is replaced by the following:

“6.8.3.2 Cargo and mail carried into the Union shall be screened by one of the means and methods listed in point 6.2.1 to a standard sufficient to reasonably ensure that it contains no prohibited articles. As from 1 January 2026 an ACC3 or RA3 may be approved for the use of explosive detection dogs (EDD) to screen cargo and mail destined to the Union only if during the EU aviation security validation process the appropriate authority or the EU aviation security validator, as applicable has observed the EDD screening process and has assessed it as meeting the objectives listed in the checklist set out in Attachment 6-M.”;

(7) in chapter 6, the following attachment 6-M is added:

“ATTACHMENT 6-M

VALIDATION CHECKLIST FOR THIRD COUNTRY EXPLOSIVE DETECTION DOGS (EDD)

Completion notes and instructions

The aim of the validation is to assess whether the applicable EDD programme in a third country and the related screening process observed at an ACC3 or RA3 location are equivalent to the EU regulatory requirements, as set out in point 6.8.3.2 of this Annex.

This checklist shall be used exclusively to assess and evaluate, if applicable, the requirements and operations pertaining to EDD. It does not replace, but supplements, the existing obligation for the EU validator to use the appropriate checklist 6-C2 or 6-C3 when performing the EU aviation security validation of an RA3 or ACC3, respectively. When applicable, this checklist shall therefore be integral part of the EU aviation security validation report and submitted to the appropriate authority.

During the EU aviation security validation of the RA3 or the ACC3 where EDD are used, questions 5.7 and 5.8 contained in checklist 6-C2 and questions 7.7 and 7.8 contained in checklist 6-C3, as applicable, shall be fulfilled by using this checklist.

When completing this checklist, please note that if the answer to any question presented in bold type is NO, the validation MUST be assessed as a FAIL, unless the question does not apply.

PART 1

Identification of the operator, entity or authority using EDD and of the EU aviation security validator

1.1. Date(s) and location of EDD validation	
Use exact date format, such as from 01/10/2025 to 02/10/2025	
dd/mm/yyyy	
1.2. Date of previous EDD validation(s) where applicable	
dd/mm/yyyy	
1.3. EU Aviation security validator information	
Name	
Company/Organisation/Appropriate Authority	
Unique alphanumeric identifier (UAI)	
E-mail address	
Telephone number – including international codes	
1.4. Name of EDD screening operator, entity or authority	
Name	
Details: Specify the nature of the operator, entity or authority and provide details: — private screening company; — government regulated company; — government screening facility or body; — Other Specify the nature of the agreement or contract between the validated entity and the entity that applies the screening on its behalf.	
Company number (e.g. commercial register identification number, if applicable)	
Number/Unit/Building	
Street	
Town	
Postcode	
State (where relevant)	
Country	

P.O. Box address, if applicable	
Unique alphanumeric identifier (UAI) of the ACC3 or RA3, if already available	
1.5. Approximate number of employees involved in EDD activities (e.g. handlers and other staff)	
Number	
1.6. Name and title of person responsible for EDD screening	
Name	
Job title	
E-mail address	
Telephone number – including international codes	
1.7. Details of the dog and handler teams that have been approved at the premises being validated.	
Name of EDD, dog handler and EDD microchip numbers.	

PART 2

Initial training and certification or approval of the EDDs and handlers

2.1. Are EDDs and their handlers subjected to initial training?	
YES or NO	
If YES, describe the training programme and the subjects that are covered in the training programme.	
2.2. Does the EDD provider possesses training records detailing the training each dog and handler combination have undertaken?	
YES or NO	
If YES, describe the evidence that is supplied within the training records in respect of initial training while commenting on the frequency with which the EDD team(s) undergo continuation training.	
2.3. Are the EDDs subject to a certification or approval process at the end of the initial training? If so, is this a national or nationally recognised certification process?	
YES or NO	
If YES, describe the entire certification process and the related documentation supporting the assessment	
2.4 Does certification or approval involve the use of real explosive target materials?	
YES or NO	
If NO, please detail what type of training aid is used	
2.5 Does certification involve the concealment of explosive target materials in a realistic simulated cargo consignment?	
YES or NO	

If YES, please describe?	
2.6 Can documentary evidence be provided to show that the EDDs and their handlers have passed the certification process, and has the validator had access to that information?	
YES or NO	
If YES, please attach an example of the document	
2.7 Is there a responsible authority for the certification process, e.g. national/State regulator?	
YES or NO	
If YES, give details of the authority responsible for the process. Is it a state approved process or the private entities' own certification process?	
2.8 Are the EDDs used trained to detect explosives only and is this limited to screening air cargo and mail, or wider categories?	
YES or NO	
If NO, please explain.	
2.9 Are real explosives used for the certification of EDD?	
YES or NO	
If NO, please explain.	
2.10 Conclusion: Given the information about initial training and the certification process provided, is the validator reasonably sure that the processes are equivalent to the EU regulatory requirements? Real explosives are used for the certification of EDD.	
YES or NO	
If NO, specify reason	

PART 3

Training materials

3.1. Are various types of training materials and/or aids being used to train the EDDs?	
YES or NO	
If YES, detail the different types of materials and training aids being use. If training material is used, provide, for example, the authorization for possession of said training material.	
3.2. Are the training materials frequently renewed/refreshed/replaced to ensure that they remain effective and fit for purpose?	
YES or NO	
If YES, detail how frequently the materials are changed and the process for deciding when training materials need to be changed.	
3.3. Are the dogs trained in realistic situations using typical cargo concealments including the presence of masking odours?	
YES or NO	

If NO, specify reason	
3.4 Has documentary evidence been provided in order for the EU aviation security validator to assess this Part as equivalent to the EU regulatory requirements?	
YES or NO	
If NO, specify reason	

PART 4

Quality control

4.1. Are EDDs and their handlers subjected to an external quality control programme?	
YES or NO	
If YES, describe the external quality control programme, including frequency, and the entity responsible for delivering this.	
4.2. Does the EDD entity have the results of external quality control tests?	
YES or NO	
If YES, detail the recent results of the external quality assurance tests for each active dog and handler combination.	
4.3. Are EDDs and their handlers subjected to an ongoing and regular internal quality control programme?	
YES or NO	
If YES, describe the internal quality control programme and its frequency.	
4.4. Does the EDD entity maintain records of internal quality control tests?	
YES or NO	
If YES, detail the results of recent internal quality control tests for each active dog and handler combination.	
4.5. Conclusion: Can the validator be sure that both the internal and external quality control processes are equivalent to the EU requirements?	
YES or NO	
If NO, specify reason	

PART 5

On-going (continuous) training

5.1. Are EDDs and their handlers subjected to on-going or continuous training after certification or approval?	
YES or NO	
If YES, describe the training programme and the subjects that are covered in the training programme, which may be the same as in 2.1 and 2.2.	
5.2. Is the ongoing training taking place at a frequency sufficient to maintain EDDs	

competence?	
YES or NO	
If YES, describe the frequency of ongoing training. Ideally training should take place daily.	
5.3. Is there any evidence of remedial measures in place to rectify any under performance in training or quality control testing?	
YES or NO	
If YES, describe the process for identifying adequate remedial measures.	
5.4 Does the EDD provider maintain a full record of each EDD (and handler) training and certification (including any retraining or rectifications/approval)?	
YES or NO	
If NO, what training and certification records are retained?	
5.5. Conclusion: Given the information about ongoing training, is the validator reasonably sure that the process is equivalent to EU requirements?	
YES or NO	
If NO, specify reason	

PART 6

Observation of the screening process

6.1 Has the validator observed the cargo screening process?	
YES or NO	
If YES, does the screening process comply with EU requirements?	
If NO, specify reason.	
6.2. Describe the general wellbeing and attentiveness of the dogs. Do they look healthy and comfortable? Are they focussed on their task or do they seem distracted?	
6.3. Has the entity provided evidence of their EDD alarm resolution protocol?	
YES or NO	
If YES, describe the entire process in detail.	
6.4. Conclusion: Has the on-site verification provided sufficient evidence enabling the validator to be reasonably sure that the processes observed and documented demonstrate compliance of EDD screening with EU standards?	
YES or NO	
If NO, specify reason.	

”

(8) in chapter 11, point 11.0.2 is replaced by the following:

- “11.0.2 For the purpose of this Chapter, ‘certification’ and ‘recertification’ mean a formal evaluation and confirmation by or on behalf of the appropriate authority indicating that the person has successfully completed the relevant training, and that the person possesses the necessary competencies to perform assigned functions to an acceptable level. The certification and recertification processes shall be standardised at national level.”;
- (9) in chapter 11, point 11.1.12 is deleted;
- (10) in chapter 11, points 11.3.2 to 11.3.5 are replaced by the following points:
- “11.3.2 The initial certification or approval process shall include:
- (a) a theoretical test or a panel interview assessing the persons theoretical knowledge necessary to perform the assigned functions; and
 - (b) a practical test assessing the competencies necessary to perform the assigned functions; and
 - (c) for persons operating x-ray and EDS equipment, a standardised image interpretation test.
- 11.3.3 The recertification or reapproval process shall include:
- (a) a theoretical test or a panel interview assessing the persons theoretical knowledge necessary to perform the assigned functions; and
 - (b) an evaluation of operational performance covering all the assigned functions or a practical test assessing the competencies necessary to perform the assigned functions, as defined by the appropriate authority; and
 - (c) for persons operating x-ray and EDS equipment, a standardised image interpretation test.
- 11.3.4 The theoretical test or panel interview shall consist of a number of questions and/or subjects discussed, sufficient to provide a comprehensive and thorough assessment of the candidate’s knowledge.
- 11.3.5 The standardised image interpretation test shall consist of a number of images, at varying difficulty, sufficient to assess the candidate’s knowledge and interpretation skills on all categories of prohibited articles relevant for the assigned functions.”;
- (11) in chapter 11, points from 11.3.6 to 11.3.9 are added as follows:
- “11.3.6 The appropriate authority may authorise a certified instructor engaged in the training of security personnel to carry out the practical test as referred to in points 11.3.2 (b) and 11.3.3. (b), provided that:
- (a) the test procedure and its content has been approved by the appropriate authority;
 - (b) the results of the test are submitted to the appropriate authority for evaluation as part of the certification or recertification process; and
 - (c) the appropriate authority performs regular quality control in this respect.
- 11.3.7 With the exception of the evaluation of operational performance covering all the assigned functions as laid down in point 11.3.3 (b), all

elements of the certification and recertification processes must be performed by, or on behalf of, the appropriate authority.

A training institute or similar, engaged by the appropriate authority to perform the certification on their behalf, must be fully independent from operators and security providers employing security personnel and from instructors delivering any training in accordance with Chapter 11.2. This does not apply for the option related to the practical tests indicated under point 11.3.6.

11.3.8 Failure to undertake or successfully complete recertification or reapproval within a reasonable timescale, not normally exceeding 3 months, shall result in the related security entitlements being withdrawn.

11.3.9 Certification or approval records shall be kept for all persons certified or approved, respectively, for at least the duration of their contract.”;

(12) in chapter 11, point 11.4.1, at the end of the second paragraph, the following sentence is added:

“The training and testing shall preferably be evenly distributed over each 6 months period. When this is not possible, training and testing shall take place at the end of each 6 months period.”;

(13) in chapter 12, point 12.0.1.2 is replaced by the following:

“12.0.1.2 There shall be both site acceptance test of each piece of security equipment being installed as well as subsequent routine testing thereof. The routine testing shall be performed irrespectively of the regular maintenance and at a frequency which ensures reasonably prompt identification of any malfunctions or decrease in performance or detection capability of the piece of equipment.”;

(14) in chapter 12, points from 12.4.2.3 to 12.4.2.5 are deleted.