Pre-load Air Cargo Targeting (PACT) Air Carrier Onboarding

2025

Purpose

- Review key requirements of the *Regulations Amending the Canadian Aviation Security Regulations, 2012* (Air Cargo) in force as of **April 1, 2025**

- Review key components of the *PACT Technical Implementation Guide*

- Share Q&As about the PACT Program

What Is PACT?

PACT aims to identify and apply mitigation measures to high-risk air cargo shipments before they are transported to Canada. This is achieved through the risk assessment of pre-loading advance cargo information (PLACI) with the assistance of advanced analytics.

PACT Program Scope

Applies to:	Does not apply to:
✓ **Air carriers** who transport cargo on a flight departing from a place outside Canada to an aerodrome located in Canada. ✓ This includes cargo on **passenger, charter, courier/express, and cargo-only flights**, as well as flights that **transit or transfer** in Canada (including Freight Remaining on Board (FROB)).	⊗ Mail ⊗ Diplomatic or consular bags ⊗ Passengers' checked baggage ⊗ Passengers' carry-on baggage ⊗ Air cargo transported on an outbound flight, departing Canada ⊗ Air cargo on domestic flights within Canada ⊗ Cargo that arrives in Canada via another mode of transportation, such as by road, sea, or rail (including where the last leg of a flight is transported via truck to Canada).

Who can participate other than air carriers?

- **Air carriers must identify their supply chain partners and service providers upon registration** to authorize the partner's connection to the PACT system.

- Supply chain partners, such as freight forwarders, may participate in PACT voluntarily **at the request of an air carrier** and submit house-level cargo data to PACT.

- Transport Canada also works directly with IT service providers, such as data aggregators and general sales/handling agents (GSAs/GHAs), to enable PACT data submissions for air carriers.

- **Note**: While air carriers may delegate the exchange of information to supply chain partners and service providers, air carriers at the last point of departure to Canada are ultimately responsible for compliance with the *Canadian Aviation Security Regulations, 2012*.

Required Information – Pre-load

Pre-Loading Advance Cargo Information (PLACI) 7+1

- Air waybill number
- Original shipper name
- Original shipper address
- Consignee name
- Consignee address
- Cargo description
- Total number of pieces (piece count)
- Total weight of the cargo

➢ the party that consigned the goods for transport to Canada by air at the earliest point in the shipment's transportation

➢ the party to which the goods will be delivered (are consigned)

➢ A plain language, precise description of the cargo. *HS Codes NOT mandatory

➢ A piece of cargo is the smallest external packing unit in a shipment

Required Information – Post-departure

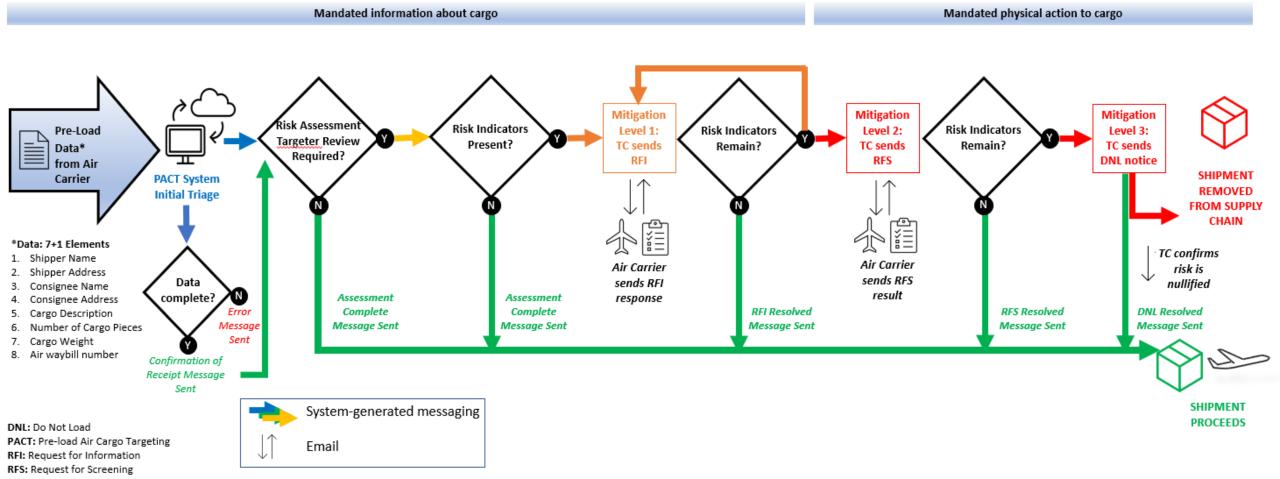| Flight information (FFM): Submit as soon as feasible after departure and before arrival |
|---|
| Date of the flight |
| Flight number |
| Destination aerodrome |
| Departure time (understood to be the time of FFM submission) |
| List of the air waybill (AWB) numbers for the flight |

Why? Transport Canada requires flight information post-departure to mark the end of each AWB's risk assessment period, after which any updates will not be considered.

Flight information is also used for compliance purposes: AWBs assessed vs AWBs on board

Accepted Messaging Types for PACT's Web API

Cargo-XML Message Type	C-IMP Message Type	CAMIR Message Type	Description	Author/Origin
XFFM	FFM		Flight manifest information	Air carriers/data submitters
XFWB	FWB		Master air waybill information	Air carriers/data submitters/freight forwarders
XFZB	FHL		House waybill information	Air carriers/data submitters/freight forwarders
XFNM		PER (error) PSN (ack)	Notification of submission errors and acknowledgements	PACT
XCSN		PSN	Notification of an "assessment complete" or the opening or closing of a risk mitigation action (RFI, RFS, DNL)	PACT

PACT's Targeting Process Flow

Acknowledgement, Error and Assessment Complete Messages

Prohibition

743 An air carrier must not transport cargo on a flight unless

(a) the Minister has confirmed receipt of the information referred to in subsection 741(1) and, if applicable, subsection 741(2);

(b) the Minister has confirmed that no further action is to be taken after the assessment of the additional information provided under subsection 741(3);

(c) the Minister has not issued a "Do Not Load" notice in respect of the cargo; and

(d) the Minister has confirmed that no further action is to be taken after the assessment of the information provided under subsection 742(3).

	Initial Receipt	System Analysis	Targeter Review
Message	1. Acknowledgement 2. Error	Assessment Complete	1. Assessment Complete 2. RFI/RFS/DNL 3. Ins./Poor Data
Timing	Instantaneous	< 30m	<2hrs
Requirement for transport	1. Yes 2. Need clear	No	1. No 2. Need clear 3. Need clear

Technical Implementation Guide Sections 3.3.1, 3.4.1 for error codes

"MISSING" error code also used for insufficient/ poor data

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Risk Mitigations

Requests for Information (RFI), Requests for Screening (RFS), Do Not Load notices (DNL)

- Reminder to have 24/7 contacts ready to respond should a request be initiated through the system (email follows).
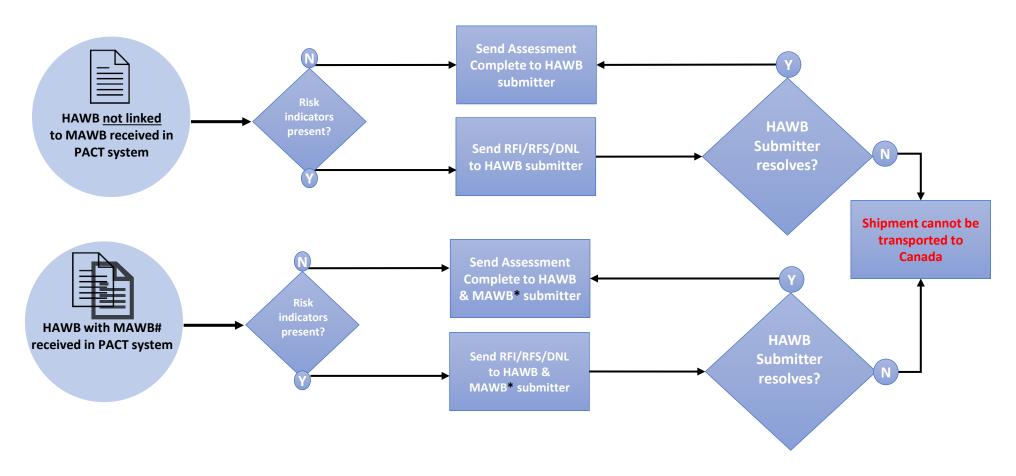
RFS

- Amendments to the *Air Carrier Security Measures* (ACSM), which provide more information on screening, are available via the Transport Canada Secure Communication Portal (TCSCP).
  - Reference:

    Cargo screening request

    742 (1) At the request of the Minister, an air carrier must screen the cargo for threat items in accordance with a security measure.
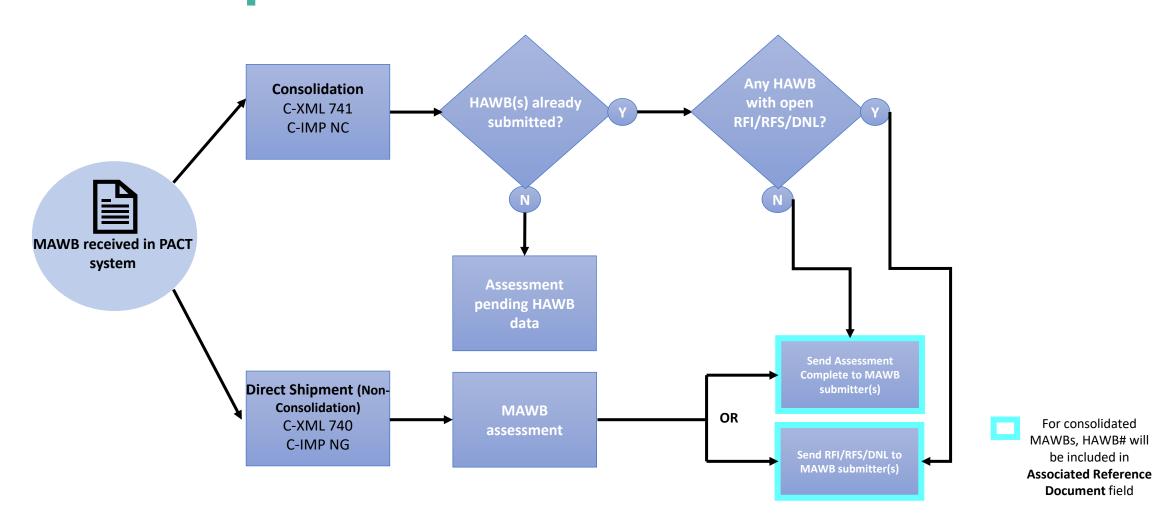
House Level and Multiple Submissions

- The regulations do not stipulate MAWB or HAWB, however, Transport Canada requires *an* AWB number associated with the 7 other data elements *and* that can then be linked to the list of AWBs provided after departure.

- HAWBs may be required where the information in the MAWB does not meet the regulatory requirements (see next Data Flow slides).

- If a freight forwarder were to provide HAWBs to Transport Canada for risk assessment on behalf of the air carrier, and the air carrier followed with MAWBs in the flight departure information, then each HAWB would need to include the MAWB#.

  - HAWBs with blank MAWB#s will be accepted but must be updated once the MAWB# is known.

Data flow for house-level assessments

*If MAWB was already sent to PACT system, PACT response is sent to MAWB submitter(s). If MAWB has not been sent to PACT system, PACT response is sent to HAWB submitter only. Once MAWB is sent, Data Flow for Consolidations vs. Direct Shipments applies.

Data flow for consolidations vs direct shipments

MAWB received in PACT system

Consolidation
C-XML 741
C-IMP NC

HAWB(s) already submitted?

Y

Any HAWB with open RFI/RFS/DNL?

Y

N

N

Assessment pending HAWB data

Direct Shipment (Non-Consolidation)
C-XML 740
C-IMP NG

MAWB assessment

OR

Send Assessment Complete to MAWB submitter(s)

Send RFI/RFS/DNL to MAWB submitter(s)

For consolidated MAWBs, HAWB# will be included in **Associated Reference Document** field

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Outages – Expectations for Air Carriers

Issue Type	Indicator	Expected Response	Contact
Acknowledgement Message	HTTP Response Code 500 or 503	• Exponential retry policy over 15m window • Notify after 15m • Wait for outage notification before transporting cargo	PACT-Information-CFAPC@tc.gc.ca *If after hours, include tc.ppp.tc@tc.gc.ca
Assessment Complete	None received after 2 hours	• Notify PACT (include 3-5 AWB#s) • Continue to load/transport cargo	
Internal (air carrier) issue affecting submission or receipt of PACT responses		• Notify PACT • Wait for PACT determination before transporting cargo	

Outages – PACT Communications

	When	What	Who
Planned Outage	3 business days prior	Email – Initial Notification	All contacts (Primary, 24/7, Technical)
Unplanned Outage	Upon confirmation	Email – Initial Notification	All contacts
All	At 1 hour	Email – Suspension of Enforcement	All contacts
	2 hours after	Email – Update (during business hours)	All contacts
	Upon resolution	Email – Outage Resolution	All contacts

Refer to Technical Implementation Guide Section **2.3.2.1** for details

⚠ **Reminder:** **Shipments with an outstanding RFI/RFS/DNL must not be transported. Communications will continue via email during an outage.**

Compliance & Enforcement

- The PACT team oversees compliance and will be focused on the most significant issues first (i.e. the transportation of cargo with outstanding RFI/RFS/DNL, missing data elements (7+1 and FFMs)).

- Transport Canada takes a graduated approach to enforcement. The PACT team will continue to work with air carriers to bring them into compliance before engaging Transportation Security Inspectors.

Administrative Monetary Penalties (AMPs) are listed in the regulations and summarized here:

CASR, 2012	Requirement:	If requirement not met, possible AMP ($)
s741(1)	Air carrier sends 7+1 data elements during pre-load timeframe. *Each element (a)-(f) can result in an AMP*	10,000
s741(2)	Air carrier sends updated data elements *(if applicable)*	10,000
s741(3)	Air carrier responds to RFI by email *(if applicable)*	10,000
s742(1)	Air carrier fulfills RFS per instructions *(if applicable)*	25,000
s742(2)	Air carrier removes threat *(if applicable)*	25,000
s742(3)	Air carrier responds to RFS with screening record/CSD by email *Each element (a)-(d) can result in an AMP*	10,000
s743	**Before transport:** a) Air carrier has received **acknowledgement message** for each shipment *(and each update, if applicable)* b) *If applicable after RFI,* air carrier has received **RFI Resolved** message c) *If applicable after DNL,* air carrier has received **DNL Resolved** message d) *If applicable after RFS,* air carrier has received **RFS Resolved** message MUST NOT TRANSPORT UNLESS MEET ALL OF (a)-(d)	25,000
s744	Air carrier sends Flight Manifest information (FFM) as soon as possible post-departure and pre-arrival. *Each element (a)-(e) can result in an AMP*	10,000
s745	Air carrier provides contact information and contact is responsive	10,000

Questions?

Contact: PACT-Information-CFAPC@tc.gc.ca