

| Group 4 Securicor Aviation Ltd. | ICTS Europe Holding BV | | KÖTTER Aviation Security GmbH & Co. KG | Prosegur Compania de Seguridad SA | | Securitas Transport Aviation Security | Custodio AG |

ASSA-I Position Paper on the Draft EP Report on an Aviation Strategy for Europe Rapporteur: MEP Pavel Telicka

Since 2002, ASSA-I represents the private aviation security services providers in national, European and International forums. The association has an international scope and includes the surveillance and protection of civil aviation, in particular the inspection of passengers, luggage and cargo.

At European level, ASSA-I is a member of the European Commission DG MOVE Stakeholder Advisory Group on Aviation SAGAS. ASSA-I has links with other relevant international organisations, such as ACI Europe, IATA, ECAC, EEA and other key stakeholder organisations within the aviation industry. In this context, ASSA-I is actively participating in the debate on the security of airports and other transport hubs, as well as on particular issues, such as the insider threat issue.

ASSA-I aims to promote professionalism and service quality of security services providers at airports. To this end, it has contributed to the development of the European Norm on Aviation and Airport Security Services EN 16082.

Comments on the draft report on an Aviation Strategy for Europe

ASSA-I welcomes the Strategy and the EP report, and the opportunity to comment on it.

As outlined in section 15 of the draft report, there is a significant challenge posed to the aviation industry and the current terrorist threat posed by ISIS will amplify the challenge.

Sharing of intelligence

Whilst private security companies have a crucial role in airport security, they are not yet considered as full partners in the security chain. With full compliance of data privacy, a certain level of data would need to be shared amongst stakeholders, with a view to implementing security procedures based on passenger differentiation.

We fully support the point made in the report regarding the need for Member States to share intelligence systematically and to exchange best practices on airport security system and procedures. ASSA-I also welcomes UN Security Council Resolution 2309, which reinforces this point. In this context we also strongly believe that professional security providers play a key role as first non-governmental responders, to significant types of occurred incident or threats. Therefore, sharing the intelligence, as well as best practises within the private security industry, will have significant impact on further development of detection capabilities and risk mitigation towards new threats.

The need for better vetting / background checks

One of the areas where sharing intelligence would be most desirable is in vetting and background checks. In the recent debates on transport security and insider threat, stakeholders have repeatedly expressed concern that vetting is not harmonised across the EU and should be more sophisticated and consistent across Member States. Background checks should also be made more regularly than every 5th year, and should consider more than the absence of a criminal record. For example, crossing data from different databases or registers should be encouraged to check applicants and

Aviation Security Services Association International Jan Bogemansstrat 249 – B-1780 Wemmel, Belgium

Phone: +32 2 462 07 77 Fax: +32 2 460 14 31



| Group 4 Securicor Aviation Ltd. | ICTS Europe Holding BV | | KÖTTER Aviation Security GmbH & Co. KG | Prosegur Compania de Seguridad SA | | Securitas Transport Aviation Security | Custodio AG |

current staff against radicalised people registers, weapons register and any other relevant database, which would help barring the way to insider threat. Exchange of intelligence between Member States would also be very helpful. Finally, stakeholders should be encouraged to implement and share insider threat best practice, as a way to prevent and detect threats before they turn into attacks.

Access control cards to non-public airport areas should also be verified more closely.

High quality criteria: best value vs lowest bidder

ASSA-I regrets that the current way of selecting private security companies is for procurement specialists with little or no knowledge of security select the lowest bidder. ASSA-I attends regular seminars where security is discussed and highlighted as high priority on all agendas. The reality strongly contrasts with these declarations. The human factor in security is key, as even the most sophisticated technology includes an important human dimension. If the only selection criteria is just price, and no attention is paid to quality, then all declarations and policies on security are just words.

Meanwhile, ASSA-I has been very actively working on improving the quality of security services across Europe, with the development of an EN Norm, and on helping clients identify and select best value in security service providers. Both these initiatives are succinctly described below.

With respect to **priority n°3 of the Commission's strategy**, the security services industry has contributed to the development of the <u>EN 16082 norm on Aviation and Airport Security Services</u>. Implementing this norm – in particular in public procurement – would ensure that service providers competing for airport security tenders abide by high quality and performance standards. The norm outlines criteria for both the companies and its management, and for the staff assigned to security services mission, for example in the area of training.

In addition to this initiative, ASSA-I has also published a "Best Value Manual" to guide purchasers of aviation security services through the quality criteria, so that when they select a provider, they know which criteria to look for. The manual encourages clients to look for best value, and not the lowest bidder, as is still too often the case, and undermines the quality of the service delivered.

Security solutions and technology

In the report the Rapporteur mentions that security procedures should be improved (p.11, 2 indent "Creating a favourable environment for smart investment"). On p.12, the Rapporteur also indicates "The development of innovative security-related solutions should (...) be encouraged". We would like to understand what concretely the Rapporteur means by these 2 sentences.

Pre-checks and one-stop concepts

Regarding the EU pre-check system inspired by the "TSA pre-check" mentioned in the last paragraph on p. 12, ASSA-I has concerns regarding these procedures, which are available for purchase, and would recommend that any such measures should guarantee the same security level as normal check. In our experience, pre-check procedures might be less stringent in comparison with regular security control operations.

Aviation Security Services Association International Jan Bogemansstrat 249 – B-1780 Wemmel, Belgium

Phone: +32 2 462 07 77 Fax: +32 2 460 14 31



| Group 4 Securicor Aviation Ltd. | ICTS Europe Holding BV | | KÖTTER Aviation Security GmbH & Co. KG | Prosegur Compania de Seguridad SA | | Securitas Transport Aviation Security | Custodio AG |

We also have concerns about the security gap created by the different requirements in the EU and USA, the latter being less stringent, in particular with pre-check procedures, combined with the one-stop concept.

ASSA-I offers its extensive knowledge and expertise in aviation and airport security services for the future debates. We feel that the private security services are part of the solution and should therefore be involved in future stakeholder meetings within the EP, as it is already the case for over a decade in the Commission's and other stakeholders committees.

Brussels, November 2016

Aviation Security Services Association International Jan Bogemansstrat 249 – B-1780 Wemmel, Belgium

Phone: +32 2 462 07 77 Fax: +32 2 460 14 31