

Frequent Asked Questions on Known Consignor Regime (KCR)

- 1) When is the implementation of the KCR?
The Known Consignor Regime can be expected to be rolled out by the 1st July 2021.
- 2) When can application for the KCR be submitted?
The application for the KCR can be submitted now. Please refer to the section 'Application Guideline' on www.police.gov.sg/kcr for more information.
- 3) Is it compulsory to register for KCR?
Consignors who do not wish to register for KCR may continue their current operations but the entire consignment of their cargo that is shipped through a cargo agent/Regulated Air Cargo Agent (RCA) will be subjected to the full extent of security measures i.e. 100% screening at the airfreight terminals. Charges will be imposed by the airfreight terminals for the application of these security measures and the charges will be borne by the respective air cargo agents who may transfer the charges to their consignors. RCAs, on the other hand, will enjoy a lower level of screening of their cargo that is from the Known Consignors as both RCAs and Known Consignors would have already adopted an acceptable level of security measures in their business operations, subject to destination bound requirements such as 100% screening requirements for all cargo exported to USA.
- 4) Is KCR applicable to imported cargo?
KCR is not applicable to imported cargo.
- 5) Is KCR applicable to transshipment cargo?
KCR is not applicable to transshipment cargo from air, land and sea as long as there is no break-bulk of cargo i.e. cargo remains in its original form from the destination it originated from.
- 6) Is KCR applicable to land and sea exports?
KCR is not applicable to land and sea exports. KCR is only applicable to air exports.
- 7) What is the cost to apply for KCR?
There is no application fee for KCR.
- 8) Must companies who possess the industry-recognised security certifications still apply or register for the KCR?
The company will still need to apply/register for the KCR upon its implementation as APD would publish the list of Known Consignors upon approval on the SPF website and have this list made known to the Airfreight Terminal Operators and Regulated Air Cargo Agents.
- 9) If the company's industry-recognised security certificate expires in the year of the application and renewal of the certification is not completed, can the company still apply for the KCR?
The company can still apply for the KCR and provide a copy of the most recent industry-recognised security certificate as well as documentary proof that the company is currently undergoing the renewal process. The renewal certificate must be produced as soon as the renewal process is completed.

- 10) If the company has one of the industry-recognised security certificates with the parent company which is located overseas, will the company based in Singapore be able to use the certification?
The certification can only be recognised if the company shows proof that the industry-recognised security certificate covers the company based in Singapore and it bears the same company name as that reflected in the ACRA business profile.
- 11) Can the industry-recognised security certificate of a third party be deemed as the company's certificate if all goods are kept at the third party's warehouse?
The industry-recognised security certificate must bear the name of the company that registers for the KCR.
- 12) If the company has a few subsidiaries, will every subsidiary have to apply to the regime, or only the main company?
The respective subsidiaries are required to apply for the KCR if they operate with their own identity that is different from their parent company. They will not need to apply if the subsidiary shares the same company name as their parent company as reflected on the ACRA business profile which has to be submitted as part of the KCR application requirements.
- 13) What is the difference between inspection and audit?
An audit is conducted upon application for KCR and upon renewal of application every 5 years thereafter. It covers all aspects of the company's KC Security Programme as approved by APD and is pre-arranged by APD with the company.
An inspection on the other hand, is conducted on an ad-hoc basis within the 5-year certification period and only covers a selected area of the KC Security Programme. The inspection will not be made known to the company beforehand.
- 14) What is the range of screening for the cargo under the Known Consignor Regime?
The screening quantum will be determined by SPF based on the prevailing threat condition.
- 15) How much difference in terms of time and cost is there between a Known and an Unknown consignor?
The lead time required to lodge cargo at the airfreight terminal is determined by the airfreight terminal operator based on guidance provided by the respective airlines.
The prevailing screening costs by SATS and dnata Airfreight Terminal Operators can be found on their respective websites:
SATS - <https://www.satscargo.com/common/Charges.html>
dnata - <https://www.icargo.net/cgs/tariff.html>
- 16) Will the company be rejected if the security programme does not meet the requirement?
The company will only be approved by APD as a Known Consignor when its application including that of its KC Security Programme is approved. Where there are areas in the KC Security Programme that do not fulfil the requirements in protecting the integrity of the secure supply chain and ensure that air cargo exported out of Singapore complies with the aviation security standards of Singapore and the International Civil Aviation Organization, APD will provide guidance on what is required to be put in place.

- 17) Where can I find the list of Regulated Air Cargo Agents?
The list of Regulated Air Cargo Agents can be found on the Singapore Police Force website <https://www.police.gov.sg/rcar>.
- 18) What is the fee for engaging the services of the accredited security consultants to draft the company's KC Security Programme?
APD does not determine the fee to be charged. The fee is to be agreed upon between the accredited security consultant and the consignor.
- 19) Is the company required to conduct internal audit on its 3rd party service provider?
Yes, the company is required to conduct internal audit on its 3rd party service provider to ensure compliance with the company's Security Programme as part of the secure supply chain process.
- 20) What is the frequency for the conduct of KCSP internal audit?
The internal audit should be conducted minimally on an annual basis.
- 21) Why is the 2-stage implementation process ending on 30 Jun 2021? Does it mean that company must implement all the security requirements of the Known Consignor Security Programme (KCSP) before application for KCR from 1 Jul 2021 onwards?
The 2-stage implementation process is only eligible to those who apply by 30 Jun 2021 and are provisionally registered KCs. This is to allow for smooth transition from existing known consignor with RACAs into known consignors under KCR. All security measures reflected in the KC Security Programme must be fully implemented by the provisionally registered KCs before 1 Jan 2022. Those companies who apply for KCR from 1 Jul 2021 onwards will be subjected to ground audits to ensure compliance with the security programme before they can be registered as a KC.
- 22) For the 2-stage implementation process, what happen if company still cannot implement the security requirements of the Known Consignor Security Programme (KCSP) by 31 Dec 2021?
The company's provisional known consignor status will be cancelled with effect from 1 Jan 2022. The company may re-apply for KCR when all its security measures are in place.
- 23) For the 2-stage implementation process for company without industry-recognised security certification, does it mean that we only need to fill up Section 3 of the KCSP by 30 Jun 2021?
If the consignor is currently a known consignor and applies for KCR by 30 Jun 2021, he is eligible for the 2-stage implementation process where provisional known consignors need only complete the KCSP on all basic cargo security measures pertaining to the manufacture, packing, storage and conveyance of known cargo and implement the security measures before 1 Jul 2021. The rest of the KCSP must be completed, implemented and approved by APD before 1 Jan 2022.
- 24) How would goods belonging to a known consignor be treated and charged when exported to the US?
All goods exported to US is subjected to 100% screening as required by US. Thus, consignor will have to bear the charges for 100% screening.
- 25) Can a company which do not have an office in Singapore i.e. based overseas apply for KCR?
Only Singapore registered companies are eligible to apply for KCR.]

26) For unknown cargo belonging to a known consignor, will it go through 100% screening?
Yes. Unknown cargo exported by a known consignor must be declared as an unknown cargo and be subjected to 100% screening.

27) Can cargo from unknown consignor be shipped on passenger aircraft?
Yes and all unknown cargo must be subjected to 100% screening.

28) My company is involved in electronic trading (i.e. resistors, capacitors, Integrated circuits, printed circuit board and etc). We import from various countries into our warehouse for consolidation and export. We do not do any assembly in Singapore with those imported items, purely import and export via a cargo agent. Can my company apply for KCR?

The current requirement is for exported cargo to be declared as unknown cargo if the cargo is not physically inspected to confirm the elimination of concealment of suspicious objects, weapons, explosives or other dangerous devices, articles and substances contained within the items or packaging of all cargo consignments. We are currently reviewing this. In the meantime, you can still register your interest to apply for KCR and APD will engage you separately after we complete the review.

29) My company outsourced our operations to a 3rd Party Logistics company. How do we apply as a KCR in this case? We imported cargo for re-export mostly and many of these cargos are sealed as finished goods. Does it mean for us to comply, we have to physically check the goods?

Yes, the current requirement is that cargo can only be declared as known if it has been physically inspected to confirm the elimination of concealment of suspicious objects, weapons, explosives or other dangerous devices, articles and substances contained within the items or packaging of all cargo consignments eg during manufacturing or packing/re-packing process. Failing which, goods will have to be declared as unknown cargo and be subjected to 100% screening. We are currently reviewing this. In the meantime, you can still register your interest to apply for KCR and APD will engage you separately after we complete the review.

30) Will a known consignor registered under the industry-recognised security certification i.e. be audited?

Those with valid industry-recognised security certificate will be subjected to ad-hoc inspections on a regular basis throughout the 5-year KC certification period.

31) Is the ZGST Warehouse (Intermediate Band) certification recognised as one of the Industry-recognised security certification for registration for KCR?

No. The industry-recognised security certificates are listed in the table.

Industry-recognised security certifications:			
1.	Singapore Customs:	Secure Trade Partnership (STP) /	Secure Trade Partnership Plus (STP-Plus)
2.	Transported Asset Protection Association (TAPA):	Air	Cargo Security Standards Level 1
3.	United States:	Customs-Trade Partnership	Against Terrorism (C-TPAT) Tier 2 or Tier 3

32) If the Master Air Waybill (MAWB) consists both known and unknown cargo, the entire MAWB will be treated as unknown cargo? Is there a requirement to RACA to split known and unknown cargo in this case so that known consignor's cargo can have the minimal inspection under KCR?

Known cargo must not be consolidated with unknown cargo. Should unknown cargo be consolidated with known cargo, then the entire shipment must be declared as unknown and be subjected to 100% screening.

33) Letter of declaration is required from a known consignor stating whether the shipment is known or unknown cargoes for every consignment. If all of our shipments will be known cargo, is a blanket letter of declaration to RACA acceptable?

Since you handle only known cargo and will never have unknown cargo, one way to circumvent the need to submit a declaration per shipment is to reflect in your security programme that your company only exports known cargo. Upon approval of the amended security programme by APD, you can then do a one-time declaration with the RACA that your company only exports known cargo.

34) My company is a registered KC. We have export shipments with parts manufactured by our qualified subcontractors (both local and overseas). Due to product quality requirement, we are not able to open the product packaging to inspect the content. In this case, are these parts considered known cargo or unknown cargo?

These parts will be considered as unknown cargo since it has not been physically inspected to confirm the elimination of concealment of suspicious objects, weapons, explosives or other dangerous devices, articles and substances contained within the items or packaging of the cargo consignments.

35) We are a US-based company with subsidiaries in Singapore. Will we still need to register for KCR if we are already involved with CTPAT?

You will still need to register for KCR if your company has one of the following valid industry-recognised security certificates.]

Industry-recognised security certifications:

1. **Singapore Customs:** Secure Trade Partnership (STP) / Secure Trade Partnership Plus (STP-Plus)
2. **Transported Asset Protection Association (TAPA):** Air Cargo Security Standards Level 1
3. **United States:** Customs-Trade Partnership Against Terrorism (C-TPAT) Tier 2 or Tier 3

36) Will it be possible to submit our application after 1 Jul 2021?

Yes, but you will not enjoy the provisional KC status and the 2-stage implementation process.

37) For existing STP holder, what do we need to submit for registration?

[APD: Please see registration and certification process.]

Known Consignor Regime (KCR)

❖ Registration & Certification

(For those with Industry-Recognised Security Certification)

- Consignors must submit:
 - Application form;
 - ACRA business profile; and
 - Valid industry-recognised security certificate
- Upon approval, a 5-year KC Certificate (wef 1 Jul 2021) will be issued to successful applicants
 - KC will be assigned with a unique identification number e.g. KC/XXXX/YYYY
- Subject to ad-hoc inspections on a regular basis throughout the 5-year KC certification period

38) Is KCR a voluntary regime? Will there be penalty imposed if a company do not register for KCR?
Correct, KCR is a voluntary regime. Your goods will be deemed as unknown cargo and subjected to 100% screening.

39) If Company A register and become a known consignor, is it possible for Company B to use Company A's known consignor status to declare its export of products bought from Company A?
The KC status is unique to your company and is non-transferable.

40) Can a company submit its application via email?
Yes, application for KCR can be submitted via email.

41) What happened when there is nonconformance observed during an ad-hoc inspections?
For all non-compliance of KCSP and conditions of registration, the KC will be investigated by APD and issued with a deficiency notice. Composition fines may be imposed.

42) How long the registration will take and to be granted with provision in a situation the consignor fulfills all the documentation requirements.
The duration for the registration process will be dependent on whether the applicant submits all required documents (including KC security programme for those without a valid industry-recognised security certificate) correctly.

43) Will ground audits be done on overseas factories i.e. Japan, China and etc which manufacture the products?
APD has no jurisdiction over entities that are based outside Singapore. But if goods obtained from overseas can be physically inspected to confirm the elimination of concealment of suspicious objects, weapons, explosives or other dangerous devices, articles and substances contained within the items or packaging of all cargo consignments eg during manufacturing or packing/re-packing process, the goods can then be declared to the RACAs as known cargo. Failing which, goods will have to be declared as unknown cargo and be subjected to 100% screening.

44) What are the audit cost / cost involved to be a KC?
No fee is charged by APD for KCR applications.

- 45) Does the 100% screening apply for Live Fish shipment?
With the implementation of KCR, live fish shipment will continue to be exempted from screening and be subjected to visual inspections of cargo and document verifications.
- 46) I understand that all US-bound cargoes will be subjected to 100% screening? Do our company still need to be registered for KCR?
If you only handle exports to US, then it does not make business sense for you to apply for KCR since all your exported cargo will be subjected to 100% screening.
- 47) Can a company applying for KCR be approved based on different warehouse locations in Singapore? For example, approval for KCR is given for one warehouse but not the rest.
KCR for a company can be approved based on different warehouse locations in Singapore that belongs to the company, provided the security measures for all the warehouses are reflected in the KC Security Programme.
- 48) How is 100% screening done on temperature-controlled products?
There is no difference in how screening for temperature-controlled products are done today regardless of whether they are screened at 100% or otherwise. The Air Express Carriers (AECs) and Airfreight Terminals (AFTs) will apply the appropriate screening method as approved by APD.
- 49) We import most of the products from our HQ in Germany & Batam subsidiary factory. We do not conduct 100% inspect/check in Singapore. Are we eligible to apply as KC ?
No, based on current requirements. However, we are currently reviewing this. In the meantime, you can still register your interest to apply for KCR and APD will engage you separately after we complete the review.
- 50) Is the KCR unique to Singapore or there are similar like program globally or in Asia?
International Civil Aviation Organization (ICAO) requires all member states to have oversight of entities in secure supply chain. There are thus similar KCR programmes globally, unless the member state so decides to subject all export cargo to 100% screening.
- 51) Is it absolutely necessary for a known consignor regulated by APD to complete the declaration template before the pick-up of cargo can be confirmed?
Yes, since a known consignor may also export unknown cargo. However, if your company only exports known cargo and will never have unknown cargo, one way to circumvent the need to submit a declaration per shipment is to reflect in your security programme that your company only exports known cargo. Then a one-time declaration with the RACA that your company only exports known cargo will suffice.
- 52) Must the declaration template be put up for shipping of similar category of items to the same consignee a few times in a week?
It is not about the category of items and the frequency these are shipped but whether the goods have been physically inspected to confirm the elimination of concealment of suspicious objects, weapons, explosives or other dangerous devices, articles and substances contained within the items or packaging of all cargo consignments eg during manufacturing or packing/re-packing process, for the goods to be declared to the RACAs as known cargo. Failing which, goods will have to be declared as unknown cargo and be subjected to 100% screening.

53) For the application form for registration to be a known consignor, is e-signature allowed?

E-signature is allowed for the KCR application form.

54) What is the approval lead time for registration to KCR during the extended provisional application period?

The duration for the registration process will be dependent on whether the applicant submits all required documents (including KC security programme for those without a valid industry-recognised security certificate) correctly. We advise you to submit your KCR application by Fri, 25 Jun 2021 so that we can process your application and register you as a known consignor before 1 Jul 2021. Applications submitted after 25 Jun 2021 will be processed and registered after 1 Jul 2021.

55) Who will be performing the ad-hoc inspection? Is it to be performed annually?

Aviation Security Inspectors from APD will conduct the ad-hoc inspections at least once a year throughout the provisional / known consignor certification period.

56) I manage one warehouse in the company premise, which service two separate business unit. when we ship, we use ship under the separate entity. Do I register as one or two entity for the same warehouse.

The KC status is unique to your individual company UEN number and is non-transferable.

57) We only have 1-2 export air shipment, can we don't sign up the KCR. will it affect my air shipment export?

KCR is a voluntary programme. You do not need to apply for KCR if your shipment volume is low. In this case, all your air export shipments will be deemed as unknown cargo and subjected to 100% screening. Delays may be expected if there is high quantum of shipments that need to be screened as unknown cargo.]

58) Is this KCR Regime similar to TradeFIRST Program?

The KCR is similar to the Secure Trade Partnership and Secure Trade Partnership Plus under Singapore Customs' TradeFIRST Program.

59) We use external 3rd party warehouse to store our goods; they are TAPA certified, can we use their TAPA cert during registration?

No.

60) If we are under STP do we still need to apply for KCR?

Yes, if you want to be a known consignor and have your known cargo subjected to a lower screening quantum.

61) We plan to use external consultants to meet KCR security procedures and fulfill requirements, is this acceptable to use ext. consultants?

The list of accredited consultants approved for KCR can be found at <https://www.police.gov.sg/kcr> (under updates). [Extracted below for your ease of reference.](#)

List of Accredited Consultants for the Known Consignor Regime (29 August 2019 to 28 August 2022)			
s/N	Company Name	Name of Participants	Email address
1	AETOS Training Academy Pte Ltd	Leong Eng Guan	sales@aetos.com.sg
2		Govindasamy Ravichandran	
3		Cheong Shun Yong (Zhuang ShunYong)	
4	AMN Consultancy Services	Chin Chee Hong	amn.consultancy@gmail.com
5	Certis Cisco Consulting Services Pte Ltd	Mohamed Abdul Razak	abdul_razak_aziz@certisgroup.com
6	Guardian Consulting Pte Ltd	Salimi bin Sualman	salimi@guardian-consult.com
7	JK Consultancy Holdings	Joshua Kwai Chee Haw	joshuakwai@jkconsultancyholdings.com
8	Live Sensor SPI Consultancy	Mohamad Shairi Bin Mohamad Shahir	mohamad.shairi@gmail.com
9	Security 4.0 Pte Ltd	Yuen Kin Wai	dexyuan@security40.com
10		Lee Choon Wai Anthony	
11		Chong Weng Leong	
12	SPCS Consultancy Pte Ltd	Yap Yeow Woon	searph77@singnet.com.sg

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Updates

List of Accredited Consultant

- List of Accredited Consultant for Known Consignor Regime [PDF]

Regulation of Known Consignors

- Further Deferment of the Implementation of the Regulation of Known Consignors (31 May 2021) [PDF]
- Air Navigation (Regulated Air Cargo Agents and Known Consignors) Regulations 2017 [WEBPAGE]
- Adjustments to the Implementation Approach for the Regulation of Known Consignors (3 Dec 2020) [PDF]
- Deferred Implementation of Changes to the Regulation of Known Consignors in Light of COVID-19 Situation (20 Apr 2020) [PDF]
- Circular on Regulation of Known Consignors (13 Jun 2019) [PDF]

62) Does it increase my chance of getting certified KCR, if I engage a Consultant? If yes, then may I know if I do not engage a Consultant, does my chance of getting certified is reduced?

There is no eligibility difference between a self-drafted security programme and one drafted by an engaged consultant.

63) what are the typical reasons on Shippers failing the certification process?

Some typical reasons include the application form is not completely filled up, the ACRA business profile is dated more than one month from the date of application, the KC security programme is incomplete where some of the fields were unanswered and etc. APD will notify the applicant on the shortcomings so that the applicant can make the necessary amendments and re-submit the application.

64) With the Covid19 now, the company business is not good, so to get the certification now is also to spend money now, hence that is one of the reasons my company is holding back in registering for KCR. May I know what is the estimated upfront investment on average?

The cost of security measures is dependent on many factors such as size of company, type of security measures considered, etc.

65) May I know about the unknown consignor 100% screening, does it require cargoes packaging to be opened up?

There is no difference in how screening for air export cargo is done today regardless of whether they are screened at 100% or otherwise. The AECS and AFTs will apply the appropriate screening method as approved by APD.

66) In the template, there is a security officer for the company, if we do not have a security officer role in our office, should we put the HR?

The security officer role can be assigned to any key staff in the company e.g. director, operations manager, HR manager.

67) So if we ship via courier services like DHL, FedEx and UPS, we will also be subjected to this KCR regime? if yes, these will also be subjected to 100% screening as Unknown Consignor as well as S\$0.02cents/kg at minimum of S\$20?

KCR is applicable to export cargo shipped via courier services/AECs. Unknown cargo is subjected to 100% screening. APD does not regulate the screening fees.

68) What is the main benefit for joining this program?

KC will enjoy the benefit of having air export cargo shipped through a RACA screened at a lower screening quantum and have lower operating costs in the long run. Delays owing to high quantum of shipments that need to be screened as unknown cargo at AFTs could be minimised.

69) If my 3PL warehouse has the security certificate, must the consignor still require to have its own security programme?

Correct. As your 3rd party warehouse has security certificates, it means they already have security measures which makes it easier for you to incorporate into your company's security programme.

70) Regarding the security programme, must it cover all the warehouses that my company has?

Correct.

71) Even if a KC engages a sub-contractor, the KC is still responsible for any non-compliance committed by the sub-contractor?

Correct.

72) How will the cargo security audit be carried out?

Cargo security audit are conducted on-site via observations, interviews and documentation reviews to ensure that the security measures are implemented as spelt out in the security programme.

73) Are perishable subjected to screening?

All types of air export cargo are subjected to screening at AFTs/AECS before they can be uplifted into the aircraft. There is no difference in how screening of products are done today regardless of whether they are screened at 100% or otherwise. The AECS and AFTs will apply the appropriate screening method as approved by APD.

74) If we have parcels shipping out via courier agents, are we subjected to this KCR?

KCR is applicable to export cargo shipped via courier services/AECs.

75) For those without industry security certificate, If we are using third party for 3 different contract manufacturers and 1 third party warehouse, does that means we need to submit 4 KCSP template?

You only need one KCSP template but will have to incorporate the security measures of all your premises and that of your 3rd party service providers therein.

76) If the company is in the mid of STP renewal, under which application should the company apply for KCR?

You may apply for KCR using your existing STP certification and concurrently have Customs provide you with a letter of extension for your STP certification in the event the certificate renewal process is not completed before expiry of your existing STP certification.

77) My company has STP plus certification. Do we still need to be audited when we apply for the KCR? We will not need to conduct any on-site audit prior to the issuance of the 5-yr KC certificate. However, your company will be subjected to ad-hoc inspections on a regular basis throughout the period of your KC certification to ensure the maintenance of the security measures as spelt out in your security programme.

78) What if we have started drafting the KCSP but unable to submit and register in time by end Jun. Will we still be penalised with additional cost and lifetime imposed to our shipments?

When application for KCR is submitted from 1 Jul 2021 onwards, you will not enjoy the provisional KC status and the 2-stage implementation process. During this time, your company is classified as unknown consignor and all shipments are subjected to 100% screening at the unknown cargo screening cost. But this is not a lifetime imposition. Once you have been successfully registered as a KC, all known cargo declared by your company will be subjected to a lower screening quantum.

79) Can we still ship cargo via airfreight even when we are not on board this KCR? This will mean our cargo will be subjected to 100% screening?

KCR program is a voluntary program and will not hinder on air cargo restrictions for non-participation. Your goods will be deemed as unknown cargo and subjected to 100% screening.

80) We have 2 physical sites located at different location but both are under the same legal entity. Do we need to prepare 1 KCSP/legal entity or 1 KCSP/physical site?

As a KCR applicant, your company only need to submit one KCSP but will have to incorporate the security measures of all your premises and that of your 3rd party service providers therein.

81) Regarding Part IV of the application form, whose signature will be on the form?

The applicant as stated in Part 1, should sign on the form.