



Part 109 regulated air cargo agent - compliance matrix

The rule references in this compliance matrix have been extracted from the Civil Aviation Rules system as the minimum compliance requirements for an applicant for the issue or renewal of a Part 109 regulated air cargo agent certificate.

A completed compliance matrix must be submitted by the applicant both for initial certification and for renewal. Additionally, the certificate holder should maintain an up-to-date compliance matrix to assist with on-going compliance and to support certificate amendment requests.

The purpose of the matrix is to speed up the certification process, ensure every applicable rule requirement has been addressed in the exposition, and reduce the cost of certification by the quick location of required policies or procedures in the applicant's exposition manual suite.

All rules have to be complied with, but not every rule has to be addressed in the exposition. At least the following rules must be included unless they are not applicable to the operation, in which case they should be annotated N/A. The intention of this matrix is to assist rather than instruct the applicant in an initial application or request for renewal. If, for your operation, compliance is required with a rule not listed in the matrix, please add it to the list and identify the exposition reference.

This matrix needs to be completed by every applicant for a Part 109 regulated air cargo agent certificate and show the exposition pages and paragraph numbers that satisfy the rules in the *Manual References / Applicant's Comments* column. Where the applicant does not meet the rule requirement or deems it not applicable, an explanation should be given in this column. **Please note ticks are not acceptable.**

The completed matrix should accompany the exposition documents and preferably be included as a component of the exposition. The applicant may submit a completed matrix in a different format as long as it includes all the rule references identified below, however there may be additional processing time required by the Civil Aviation Authority (CAA) in cross-referencing requirements.

General Manual Layout and Distribution

Manual binders: Can the manual be amended easily? (Three- or four-ring binders are preferred: two-ring binders are not recommended as the pages are too easily torn). If permanently bound, do you intend to re-issue at every amendment? This may inhibit frequency of needed amendments.

Electronic exposition: Is the matrix included as part of the file(s)/disc? If so, is it up to date? Have you considered the methods for distributing to the CAA and how you will manage amendments?

**Applicant:****Participant ID:****Manuals Submitted:****Rev.:****Dated:**

	Applicant's Comments	CAA Comments (for CAA use only)
<i>Rule Compliance Matrix</i>		
<i>Company Statement page, signed by the Chief Executive</i>		
<i>List of Effective Pages</i>		
<i>Record of Amendments</i>		
<i>Distribution List & copies to be numbered</i>		
<i>Contents Page</i>		
<i>Definitions & Abbreviations (not mandatory)</i>		
<i>On every page, headers and/or footers to include:</i> (a) <i>Company name</i> (b) <i>Name of the manual</i> (c) <i>Effective revision and date of the page</i> (d) <i>Page number</i>		
<i>Index (not mandatory but desirable)</i>		

Rule Reference	Manual References / Applicant's Comments	CAA Review & Comments (for CAA use only)
109.71 Exposition		
109.71(a)(1)(i) CE statement		
109.71(a)(1)(ii) CE statement		
109.71(a)(2) [109.51(a)(1)&(2)] List of senior persons		
109.71(a)(3) [109.51(a)(1)&(2)] Duties and responsibilities		
109.71(a)(4) Organisation chart		
109.71(a)(5) [109.51(a)(3)] Staffing structure		
109.71(a)(6) Scope of activities		
109.71(a)(7) Locations and facilities	For all exposition-based facility requirements use 109.53 section below	
145.67(a)(8) Internal QA	For all exposition-based QA requirements use 109.69 section below	
Procedures 109.71(a)(9)(i)(xiii)	For all exposition-based procedures use 109.51, 109.55, 109.57, 109.59, 109.61, 109.63, 109.65 and 109.67 sections below	
109.71(a)(10)(i)-(iii) Control of exposition		
109.105 Changes to organisation		
109.51 Competence		
109.51(b) Assessing and	For all exposition-based competency and training procedures use 109.63 section below	

<i>maintaining competence</i>		
109.53 Facility Requirements		
109.53(1) <i>Receiving from unknown customer</i>		
109.53(2) <i>Receiving from known customer</i>		
109.53(3) <i>Storing and protecting</i>		
109.53(4) <i>Delivering</i>		
109.55 Cargo and Mail Security Control Procedures		
Unknown customer 109.55(a)(1) <i>Security controls applied</i>		
Known customer 109.55(a)(2)(i) <i>Statement of content (SOC) included</i>		
109.55(a)(2)(ii) <i>Checked for tampering</i>		
109.55(a)(3)(i) <i>SOC checked</i>		
109.55(a)(3)(ii) <i>SOC identified as coming from known customer</i>		
109.55(a)(4) <i>Held in access controlled area</i>		
109.55(a)(5)(i) <i>[App. A1] Declaration of security</i>		

Ref 109.107(1)-(2)		
109.55(a)(5)(ii) <i>Protection from tampering</i>		
109.55(b) <i>Trained and authorised</i>	<i>Refer 109.59 and 109.63 sections below for authorisation and training procedures</i>	
109.57 Screening Procedures [App. B]		
109.57(b)(1) <i>identify methods</i>		
109.57(b)(2) <i>Details of processes</i>		
109.57(b)(3) <i>Authorised personnel</i>	<i>Refer 109.59 section below for authorisation procedures</i>	
109.57(b)(4) <i>Programme and procedures for testing</i> App. B.2(a) App. B.2(b) App. B.2(c)		
109.57(b)(5) <i>Maint. programme</i>		
109.57(b)(6) <i>Assessing significance of failure and actions</i>		
109.59 Authorisation Procedures		
109.59(b) <i>Issue of authorisation to enter controlled area</i>		
109.59(c)(1)(i) <i>Favourable security check</i>		
109.59(c)(1)(ii) <i>Appropriately trained</i>		
109.59(c)(1)(iii) <i>Assessed competent</i>		

109.59(c)(1)(iv) <i>Knowledge</i>		
109.59(c)(2)(i)-(iii) <i>Written authorisation</i>		
109.59(c)(3) <i>Issued for 3 years</i>		
109.59(c)(4) <i>Auth. re-issued</i>		
109.61 Procedures and Register for a Known Customer		
109.61(a)(1) <i>Knowledge of security matters</i>		
Systems and proc. 109.61(a)(2)(i) <i>Intended items only</i>		
109.61(a)(2)(ii) <i>Statement of content</i>		
109.61(a)(2)(iii) <i>Protection from tampering</i>		
109.61(a)(2)(iv) <i>No tampering</i>		
109.61(b) <i>Means of compliance</i>		
109.61(c)(i)-(iii) <i>Register of known customers</i>		
109.63 Training of Personnel		
109.63(a)(1) <i>Appropriate training</i>		
109.63(a)(2) <i>Appropriate training and competency assessment</i>		
109.63(b)(1)		

<i>Applicable segments</i>		
109.63(b)(2) <i>Syllabi</i>		
109.63(c) <i>Recurrent training every 3 years</i>		
109.63(d) <i>Standards of App. C</i>		
109.65 Cargo Security Incident [Part 12 occurrence reporting]		
12.55(a)(8) <i>Notification of cargo security incident</i>		
12.55(d)(8) [App A(h)] <i>Required information</i>		
12.57(a)(1) <i>Provide details</i>		
12.57(b)(1)-(3) <i>Means of providing details</i>		
12.59(1) <i>Conduct investigation</i>		
12.59(2)(i)-(iii) <i>Submit report to CAA</i>		
12.59(3) <i>Preventative action</i>		
109.65(2) <i>Corrective Actions</i>		
109.67 Records		
109.67(a)(1) <i>Every consignment of cargo or mail</i>		
109.67(a)(2) [109.63] <i>Training records</i>		
109.67(a)(3) [109.59] <i>Authorisation records</i>		

109.67(a)(4) [109.61(b)&(c)] <i>Known customer register</i>		
109.67(a)(5) [109.65] <i>Investigation records</i>		
109.67(a)(6) <i>QA reviews</i>		
109.67(b)(1) <i>Accurate, legible and permanent</i>		
109.67(b)(2)(i) <i>Retention period of personnel records</i>		
109.67(b)(2)(ii) <i>Retention period of SOC or declaration of security</i>		
109.69 Internal Quality Assurance		
109.69(b)(1) <i>Security policy and procedures</i>		
109.69(b)(2) <i>Quality indicators</i>		
109.69(b)(3) <i>Corrective action</i>		
109.69(b)(4) <i>Preventive action</i>		
109.69(b)(5) <i>Audit programme</i>		
109.69(b)(6) <i>Management review</i>		
109.69(c) <i>Access to CEO</i>		
109.109 Entry to Access Controlled Area		

109.109(2) <i>Accompanied by a person holding an authorisation</i>		
List any other rules complied with:		

CAA Use

Assessed by:

Case number:

Date received:

Date accepted:

This compliance matrix was established using the rules in force on 5 April 2025

Other rules or advisory circulars referred to during the assessment by Inspector

Development status control

Revision	Date	Status	Reason for amendment
4	April 2025	Final	Updated to reflect the new rules issued under the Civil Aviation Act 2023 (note: no rule changes were made. The rules referenced in this compliance matrix are the same as those established under the Civil Aviation Act 1990 in Part 12 Amendment 10, effective 30 October 2017, and Part 109 initial issue, effective 9 October 2008).
			<i>Other changes:</i> Minor formatting; terminology changed to align with CAA's operational policy naming conventions and business systems; status control added.