



# Report on Airports Used by Mahan Air

Report to Congress

February 15, 2019



Homeland  
Security

*Transportation Security Administration*

# Message from the Administrator

February 15, 2019

I am pleased to present the following “Report on Airports Used by Mahan Air,” prepared by the Transportation Security Administration (TSA) in consultation with the U.S. Department of Transportation, U.S. Department of State, U.S. Department of the Treasury, and the Director of National Intelligence.



This report was compiled pursuant to the *TSA Modernization Act* (P.L. 115-254), signed into law on October 5, 2018. The report provides information on Mahan Air operations and U.S. security interests at international Last Point of Departure airports.

Pursuant to congressional requirements, this report is being provided to the following Members of Congress:

The Honorable Roger Wicker  
Chairman, Senate Committee on Commerce, Science, and Transportation

The Honorable Maria Cantwell  
Ranking Member, Senate Committee on Commerce, Science, and Transportation

The Honorable Ron Johnson  
Chairman, Senate Committee on Homeland Security and Governmental Affairs

The Honorable Gary Peters  
Ranking Member, Senate Committee on Homeland Security and Governmental Affairs

The Honorable Bennie Thompson  
Chairman, House Committee on Homeland Security

The Honorable Mike Rogers  
Ranking Member, House Committee on Homeland Security

Inquiries relating to this report may be directed to me or the TSA Legislative Affairs office at (571) 227-2717.

Sincerely yours,

A handwritten signature in black ink that reads "David P. Pekoske". The signature is written in a cursive, slightly slanted style.

David P. Pekoske  
Administrator

# Executive Summary

On September 23, 2001, President George W. Bush issued Executive Order 13224, “Blocking Property and Prohibiting Transactions With Persons Who Commit, Threaten To Commit, or Support Terrorism.” The U.S. Department of the Treasury designated Iranian airline Mahan Air as a Specially Designated Global Terrorist pursuant to Executive Order 13224 on October 12, 2011<sup>1</sup> for providing financial, military equipment, and technological support to the Islamic Revolutionary Guard Corps-Qods Force. Based in Tehran, Mahan Air provides transportation, funds transfers, and personnel travel services to the Islamic Revolutionary Guard Corps-Qods Force. Since the onset of the Syrian civil war, Mahan Air and other designated Iranian commercial airlines have routinely flown fighters and military equipment to Syria to aid the Assad regime’s attacks against its own people.

As a result of U.S. sanctions against Mahan Air, individuals and entities maintaining commercial relationships with Mahan Air and other designated Iranian airlines are themselves at risk of being designated under Executive Order 13224 for providing support to an Specially Designated Global Terrorist. In addition to general sales agent services such as reservation and ticketing services, potentially sanctionable activities—when conducted for or on behalf of a designated person—include procurement of aircraft parts and equipment, maintenance contracts, provision of airline ground services, catering, interline transfer and codeshare agreements, refueling contracts, cargo cooperation agreements, cargo sales agent services and agreements, and freight forwarding services.<sup>2</sup> It is incumbent on all persons operating in the civil aviation industry to implement appropriate controls to ensure compliance with legal requirements and sanctions.

Of the 42 destinations Mahan Air serviced between October 2016 and October 2018, 15 of those airports conduct Last Point of Departure operations to the United States. TSA regularly conducts security assessments at all Last Point of Departure airports, and airlines must agree to meet all security requirements mandated by TSA as a requirement to operate flights to and from the United States.

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<sup>1</sup> October 12, 2011 Treasury press release: <https://www.treasury.gov/press-center/press-releases/Pages/tg1322.aspx>

<sup>2</sup> July 9, 2018 Treasury press release: <https://home.treasury.gov/news/press-releases/sm423>



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# I. Legislative Language

This report is submitted pursuant to section 1958 of *The TSA Modernization Act* (P.L. 115-254), which states:

## **SEC. 1958. REPORT ON AIRPORTS USED BY MAHAN AIR**

(a) **IN GENERAL.**—Not later than 120 days after the date of enactment of this Act, and annually thereafter through 2021, the Secretary of Homeland Security, in consultation with the Secretary of Transportation, the Secretary of State, the Secretary of the Treasury, and the Director of National Intelligence, shall submit to Congress a report that includes

(1) a list of all airports at which aircraft owned or controlled by Mahan Air have landed during the 2 years preceding the submission of the report; and

(2) for each such airport—

(A) an assessment of whether aircraft owned or controlled by Mahan Air continue to conduct operations at that airport;

(B) an assessment of whether any of the landings of aircraft owned or controlled by Mahan Air were necessitated by an emergency situation;

(C) a determination regarding whether additional security measures should be imposed on flights to the United States that originate from that airport; and

(D) an explanation of the rationale for that determination.

(b) **FORM OF REPORT.**—Each report required by subsection (a) shall be submitted in unclassified form, but may include a classified annex.

(c) **PUBLICATION OF LIST.**—The list required by subsection (a)(1) shall be publicly and prominently posted on the website of the Department of Homeland Security on the date on which the report required by subsection (a) is submitted to Congress.

## II. Mahan Air Operations

In 2011, the U.S. Department of the Treasury designated Mahan Air a Specially Designated Global Terrorist (SDGT)<sup>3</sup> for providing financial, material, or technological support for the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF). Since the onset of the Syrian civil war, Mahan Air and other designated Iranian commercial airlines have routinely flown fighters and military equipment to Syria. As a result of U.S. sanctions against Mahan Air, individuals and entities maintaining commercial relationships with Mahan Air and other designated Iranian airlines are themselves at risk of being designated under Executive Order (E.O.) 13224 for providing support to an SDGT.

In 2018, the United States designated 11 entities supporting Mahan Air's activities, including front companies<sup>4</sup> procuring spare aircraft parts for Mahan and general sales agents (GSAs) providing services to Mahan in Malaysia<sup>5</sup> and Thailand.<sup>6</sup> As a result of U.S. diplomatic outreach and the credible threat of U.S. sanctions, several companies have stopped working with Mahan Air, and some countries have denied Mahan Air landing rights.

The Department of Homeland Security (DHS), U.S. Department of Transportation (DOT), U.S. Department of State (DOS), U.S. Department of the Treasury, and the Director of National Intelligence (DNI) have been in close coordination with regard to monitoring Mahan Air activities, recommending designation of companies that do business with Mahan Air, and enhancing international aviation security. In the summer of 2017, TSA undertook a series of initiatives designed to raise the global aviation security baseline to establish a common view of the threat and enhance aviation security throughout the world. This initiative continues throughout 2018 and into 2019 as TSA works with its international and domestic stakeholders to push new countermeasures to mitigate emerging risks to the aviation network.

As required by Section 1958(a)(1), below is a list of airports at which "aircraft owned or controlled by Mahan Air" have landed during the past two years.<sup>7</sup>

### **Mahan Air Destinations from September 2016 to October 2018**

Country	City	Airport
Afghanistan	Kabul	Kabul-Hamid Karzai International Airport (KBL)
Armenia	Yerevan	Zvartnots International Airport (EVN)
Azerbaijan	Baku	Heydar Aliyev International Airport (GYD)
Bulgaria	Varna	Varna Airport (VAR)

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<sup>3</sup> July 9, 2018 Treasury press release: <https://home.treasury.gov/news/press-releases/sm423>

<sup>4</sup> May 24, 2018 Treasury press release: <https://home.treasury.gov/news/press-releases/sm0395>

<sup>5</sup> July 9, 2018 Treasury press release: <https://home.treasury.gov/news/press-releases/sm423>

<sup>6</sup> September 14, 2018 Treasury press release: <https://home.treasury.gov/news/press-releases/sm484>

<sup>7</sup> The list reflects airports served by Mahan Air at some point during the 2-year period. Mahan Air does not currently operate to all of these airports.

<b>Country</b>	<b>City</b>	<b>Airport</b>
China	Beijing	Beijing Capital International Airport* (PEK)
	Guangzhou	Guangzhou Baiyun International Airport* (CAN)
	Shanghai	Shanghai Pudong International Airport* (PVG)
Denmark	Copenhagen	Copenhagen Airport, Kastrup* (CPH)
France	Paris	Paris-Charles de Gaulle Airport* (CDG)
Germany	Dusseldorf	Dusseldorf International Airport* (DUS)
	Munich	Munich International Airport* (MUC)
India	Goa	Goa International Airport (GOI)
	New Delhi	Dehli-Indira Ghandi International Airport* (DEL)
Indonesia	Bali	Ngurah Rai International Airport (DPS)
Iraq	Baghdad	Baghdad International Airport (BGW)
	Erbil	Erbil International Airport (KRG)
	Najaf	Al Najaf Al-Ashraf International Airport (NJF)
	Sulaymaniyah	Sulaimaniya International Airport (ISU)
Italy	Milan	Milan-Malpensa Airport* (MXP)
Kazakhstan	Almaty	Almaty International Airport (ALA)
Kuwait	Kuwait City	Kuwait International Airport (KWI)
Kyrgyzstan	Bishkek	Manas International Airport (FRU)
Lebanon	Beirut	Beirut-Rafic Hariri International Airport (BEY)
Malaysia	Kuala Lumpur	Kuala Lumpur International Airport (KUL)
Pakistan	Lahore	Lahore Allama Iqbal International Airport (LHE)
Russia	Moscow	Vnukovo International Airport (VKO)
	Sochi	Sochi International Airport (AER)
	St. Petersburg	Pulkovo International Airport (LED)
Spain	Barcelona	Barcelona-El Prat Airport* (BNC)
	Malaga	Malaga Costa Del Sol International Airport* (AGP)
Sri Lanka	Colombo	Colombo Bandarnaike International Airport (CMB)
Syria	Damascus	Damascus International Airport (DAM)
	Latakia	Bassel Al-Assad International Airport (LTK)
Thailand	Bangkok	Bangkok-Suvarnabhumi International Airport* (BKK)
	Phuket	Phuket International Airport (HKT)
Turkey	Ankara	Ankara Esenboga Airport (ESB)
	Cardak	Denizli Cardak Airport (DNZ)
	Isparta	Isparta Sleyman Demirel Airport (ISE)
	Istanbul	Istanbul Ataturk International Airport* (IST)
UAE	Dubai	Dubai International Airport* (DXB)
Ukraine	Kiev	Kiev Boryspil International Airport* (KBP)
Vietnam	Hanoi	Hanoi-Noibai International Airport (HAN)
	Ho Chi Minh City	Ho Chi Minh City International Airport (SGN)

\*Active LPD airports to the United States as of November 2018.

### III. Emergency Landings

From September 2016 to October 2018, Mahan Air made emergency landings at the following airports:<sup>8</sup>

Country	City	Airport
India	New Delhi	Delhi-Indira Ghandi International Airport* (DEL)
Iran	Tehran	Tehran Imam Khomeini International Airport (IKA)
	Zahedan	Zahedan International Airport (ZAH)

\*Active LPD airports to the United States as of 2018.

### IV. Additional Security Measures

The international community presently faces an extremely high threat environment with continued effort by terrorists to target the aviation sector – particularly commercial aircraft. TSA works collaboratively with foreign partners, including foreign governments, foreign air carriers, U.S. aircraft operators with flight operations at foreign airports, international organizations, and foreign airport authorities, to ensure the security of the global aviation system.

TSA assesses aviation security measures at airports with LPD flight operations to the United States by evaluating implementation of the international aviation security Standards and Recommended Practices established by the International Civil Aviation Organization (ICAO). TSA also uses its regulatory authorities to ensure airlines with operations to the United States implement necessary security measures at foreign locations. As a requirement to operate flights to and from the United States, airlines must agree to meet all security requirements mandated by TSA. In fiscal year (FY) 2018, TSA conducted 145 foreign airport assessments and 1,967 air carrier inspections at foreign airports. Information gathered during these visits enables TSA to identify and analyze specific vulnerabilities that exist, which allows for better targeting of mitigation activities to improve security at these foreign airports.

TSA also has the authority to issue Security Directives and Emergency Amendments to U.S. aircraft operators and foreign air carriers operating flights to and from the United States. This authority allows TSA to rapidly address emergent threats by requiring additional and/or enhanced security measures that are designed to mitigate the threat, address vulnerabilities, and enable TSA to enhance the overall security posture as needed.

In addition, to address the threat to aviation security, DHS has implemented several measures to raise international aviation standards – also known as the *Raising the Global Baseline Initiative*. This initiative is part of TSA’s efforts to stay ahead of threats, keep passengers safe, and

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<sup>8</sup> Source: Department of Defense

continuously increase capabilities through a responsive and layered approach to security. The goal of this initiative is a sustained ability to deter, detect, and deny our adversary access or the ability to insert a threat into the aviation system and thereby making an attack on civil aviation less attractive and higher risk for terrorists to consider in the future.

The initial phase of the *Raising the Global Baseline Initiative* included several areas of focus for foreign governments to address:

- Intelligence-based rules to increase secondary or “selectee” screening;
- Screening of personal electronic devices (PEDs);
- Passenger security interviews/behavior analysis;
- Insider threat;
- Employee vetting;
- Next generation screening technology;
- Canine screening; and,
- Information sharing on Known or Suspected Terrorists (KSTs).

*Raising the Global Baseline* consists of a global SD/EA requiring all LPDs to comply with these measures or TSA-approved Alternate Procedures (APs). All LPDs listed under Section III of this report fall under these requirements.

As part of this Initiative, in 2017, TSA introduced additional aviation security requirements that prohibited travelers from carrying PEDs in the cabin of U.S.-bound aircraft departing from 10 airports in the Middle East and North Africa.

In June 2018, TSA again introduced a worldwide SD/EA to address chemical and powder threats. All passengers traveling with powder-based substances in a carry-on bag are now subject to additional screening or prohibition from the cabin of the aircraft. TSA also increased the selectee rate for secondary screening overseas. Each of the 15 LPD locations where Mahan Air operated in the last two years is subject to all of these requirements.

In addition to the above, passengers originating on flights outside of the European Commission and connecting to flights within the European Commission (i.e., Mahan Air Flight from Iran to Germany where passengers would connect to a U.S. bound flight) are rescreened to European Commission standards prior to mixing with departing passengers. Of the list in Section III, that includes airports in Spain, Germany, Denmark, and France. These standards require:

- screening of passengers, cabin baggage and hold baggage;
- airport security (access control, surveillance);
- aircraft security checks and searches;
- screening and control of cargo and mail;
- screening of airport supplies;
- staff recruitment and training;
- liquid, aerosol, and gel (LAG) screening; and
- use of security scanners;

Several of the LPDs are also required to conduct additional security measures, known as site-specific SDs/EAs. These can be issued due to a threat in a region, known vulnerabilities at an airport, or to address a narrow security issue such as cargo handling.

As part of TSA's compliance efforts to ensure the proper implementation of these requirements, international inspectors traveled to all 280 LPD airports to assess the implementation of these targeted security measures. As a result of the LPD visits to airports where Mahan Air currently flies, TSA has determined that no additional security measures are currently necessary. TSA inspectors verified compliance with all elevated security measures and U.S.-bound flight operations within the last year, with frequent and recurring visits scheduled to high-risk locations.

## V. Conclusion

TSA continues to work with international partners to align global aviation security standards. Many partner nations and air carriers are investing in new checkpoint technologies, increasing security throughout their airports, and implementing procedures that better protect the aircraft and passengers.

TSA will continue to work with our interagency partners, as well as our international partners, to assess the security situation with regard to Mahan Air operations, and make necessary security adjustments, as needed.