

Dangerous Goods Training Annex 6 and 18

Regional Seminar/Workshop
on the Safe Transport of
Dangerous Goods

Inspector Training

- CAAs verify the training of the regulated parties with vigilance. However, CAAs do not have the same vigilance in training their inspectors.

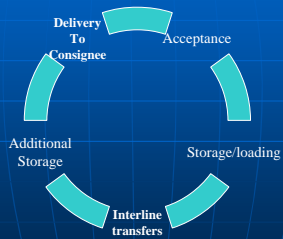
Dangerous Goods Requirements

	States	Shippers	Operators
Training	Annex 6 Annex 18	ICAO TI (Annex 18)	Certificate (Annex 6) ICAO TI (Annex 18)
Compliance	Annex 6 Annex 18	ICAO TI (Annex 18)	Certificate (Annex 6) ICAO TI (Annex 18)
Enforcement	Annex 6 Annex 18	ICAO TI (Annex 18)	Certificate (Annex 6) ICAO TI (Annex 18)

Annex 6 - Operators



Annex 18 - Operators Air Transportation Cycle



Dangerous Goods Training

- Training requirements for dangerous goods are included in Annex 6 and in Annex 18.
- Under Annex 6 requirements persons performing certain functions must be trained in the approved training program for the certificate holder.
- Under Annex 18 requirements persons performing certain functions must be trained in designated aspects of dangerous goods transportation. Some States approve these programs some do

Annex 6 Dangerous Goods Training

- Training requirements for operators who hold operations specifications to carry dangerous goods and operators who do not carry dangerous goods.
- Training programs must be approved by the competent authority.
- Annex 18 requirements may be incorporated by reference.

Annex 6 Dangerous Goods Training

- Operators authorized to carry dangerous goods and operators prohibited from carrying dangerous goods all must have an approved training program. The difference in the programs will be:
 - Aspects required to be covered
 - Depth of training required.

Annex 18 Dangerous Goods Training Requirements

- Training requirements are commensurate with the responsibilities for:
 - Shippers – Offering
 - Operators functions– Accepting and Transporting
 - Freight Forwarders
 - Passenger handling staff
 - Crew members
 - Security Staff

Verification of Dangerous Goods Training

- Record keeping requirements:
 - Training records are required. There should be training records available for any personnel performing a covered (TI required) function regardless of the relationship. Anyone performing the covered function (contractor, subcontractor, direct employee) must be trained.

Annex 18 Compliance

- Inspections and activities:
 - Outreach
 - Air Carrier Inspections
 - Shipper Inspections
 - Repair station Inspections
 - Incident Response

Operator Responsibilities

- Acceptance
- Storage and Loading
- Inspection and decontamination
- Provision of Information

Operator Inspections

- Can be conducted by safety inspectors (OPS)
- Can be conducted by dangerous goods inspectors
- Either way both the Annex 6 and Annex 18 requirements may be inspected for compliance during the same inspection or separately.

What does this all mean?

- If the dangerous goods inspectors inspect the Annex 6 and 18 components then they have to be trained in both.
- If the ops inspectors inspect the Annex 6 components related to dangerous goods then they need to be trained in dangerous goods and operations.

Summary

Function	Need Dangerous Goods Training
Inspect Annex 6 only	yes
Inspect Annex 6 without DG aspects	no
Inspect Annex 18 only	yes
Inspect Annex 18 and Annex 6	yes

Comments

- Being expanded within Annex 18 is already a requirement in Annex 6. The program for will not carry operators is required be submitted through the approval process for certification.
- Annex 18 also requires other than operators, handling agents...to be trained when handling other than dangerous goods for air transport.

Aircraft Components Annex 6

- Components required for the operation of aircraft are approved for use under the Airworthiness Standards and handled as part of the aircraft until...
- Components used on aircraft during operation in flight service can be dangerous goods in use.

Use on Aircraft

- When approved by the CAA:
 - Are the devices or materials approved by dangerous goods experts or only the airworthiness experts.
 - Do the airworthiness view the materials or devices from the DG aspect?
 - Do the DG regulations allow for these devices or materials currently?

COMAT Annex 18

- Company Owned MATerial is **transported** as COMAT by the operators.
- The dangerous goods regulations require that except for the provisions in Part 1 of the ICAO TI, COMAT must be transported in compliance with all the requirements of the ICAO TI.

Annex 18

- Training requirements are based on functions being performed.
- Most frequent violation cited in enforcement cases.
- There are no training program approval processes required for shippers.
- The training institute and instructor requirements vary from State to State.

Connections to other Annexes

- Airports
 - Signage requirements
- Airworthiness
 - Certification of cargo compartments and ULDs
- Accident Investigation
- Air Traffic Services
 - Emergency services

Shipper Responsibilities

- Classification
- Packaging
- Marking
- Labeling
- Documentation

All shippers of dangerous goods must be trained in accordance with Annex 18.

Shipper Inspections

- Repair Stations
- Operator stores (COMAT)
- Incidents and accidents
- Undeclared shipments
- Offerors of dangerous goods
- Exemption and Approval holders
- Freight forwarders

Incidents

- All States should have a dangerous goods incident reporting system.
- Any incident that a State believes demonstrates a need for the TI to be changed, should bring that information to ICAO.
- Any incident which occurs from the point of acceptance by an operator to the delivery to a consignee is considered in transportation and all requirements of Annex 18 apply.
- Incidents occurring during the operation of an aircraft are reported under Operational requirements.

Enforcement

- Annex 18 Authority
 - Civil
 - Criminal
- Annex 6 Authority
 - Normally linked to certificate actions.

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