



DANGEROUS GOODS PANEL (DGP)

TWENTY-SIXTH MEETING

Montréal, 16 to 27 October 2017

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2019-2020 Edition

THE DANGEROUS GOODS TRAINING OF PERSONNEL EMPLOYED BY OR INTERACTING WITH THE AVIATION INDUSTRY IN AREAS OF ENGINEERING AND MAINTENANCE

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SUMMARY

This working paper shares the United Arab Emirates' experience in investigating a recent dangerous goods occurrence when the absence of trained dangerous goods personnel of the aviation maintenance entity (acting as the shipper) resulted in a serious incident of misdeclared UN 3356 — **Oxygen generator, chemical**.

Action by the DGP: The DGP is invited to agree to mandate dangerous goods training as described in paragraph 2 (Recommendation) of this working paper.

1. INTRODUCTION

1.1 On 29 June 2017, an aviation maintenance entity, in coordination with freight forwarding agencies, offered for air transport a cargo shipment containing ten aircraft passenger service units (PSUs) under UN 3356 — **Oxygen generator, chemical** from the United Arab Emirates to the United Kingdom on passenger aircraft, where as per the *Technical Instructions for the Safe Transport of Dangerous Goods by Air*, these generators are forbidden for transport on passenger aircraft unless certain special provisions are complied with, hence must have been transported on cargo aircraft only (CAO).

1.2 The shipment was flown with multiple deficiencies as detailed below:

- a) in non-compliance with the UAE General Civil Aviation Authority's Civil Aviation Regulations, CAR PART VI CHAPTER 2;
- b) misdeclared as UN 1072 — **Oxygen compressed**, and transported on passenger aircraft;

- c) with discrepancies in the documentation, packaging and labelling;
- d) without the generators' safety pin/cap attached; and
- e) with one generator labelled as "UNSERVICEABLE", which as per Special Provision A111 of the Technical Instructions is FORBIDDEN for air transport.

1.3 The investigation conducted by the United Arab Emirates General Civil Aviation Authority's (GCAA) dangerous goods investigators after coordination with the GCAA airworthiness department and interviewing all parties involved, revealed that the aviation maintenance entity:

- a) is 145 Certified by the United Kingdom Civil Aviation Administration (CAA) and the United Arab Emirates GCAA;
- b) removed the generators from a non-A6 registered aircraft in the UAE;
- c) failed to declare the actual description of the goods;
- d) failed to affix the generators' safety pins/caps;
- e) provided the freight forwarding agency with incorrect/misleading documentation for UN 1072 instead of UN 3356;
- f) none of its employees and engineers have been dangerous goods trained/never undergone dangerous goods awareness;
- g) involved in the processing and transport of dangerous goods by air in violation of 9.6 of GCAA CAR PART VI CHAPTER 2, Transport of Dangerous Goods by Air; and
- h) handed over some of the generators to the shipper's agent in loose and unsafe condition.

1.4 The outcome of the investigation/interview with all parties involved and the action taken by the United Arab Emirates GCAA can be shared with DGP members, as and when required.

1.5 This serious incident raised our concern with whether sufficient consideration should be given to the current dangerous goods training provisions in 1;4.2.7:

Note 2.— The categories of personnel identified in Tables 1-4 and 1-5 are not all encompassing. Personnel employed by or interacting with the aviation industry in areas such as passenger and cargo reservation centres, and engineering and maintenance, except when acting in a capacity identified in Table 1-4 or 1-5, should be provided with dangerous goods training in accordance with 4.2.

1.6 The note (between brackets) under Part 1;4.2.3 in the proposed new Part 1, Chapter 4 — Dangerous Goods Training of the Competency Based Training which planned to take effect from 1 January 2019, reads as follows:

[Note.— In order to prevent the introduction of undeclared dangerous goods into air transport, any person, such as passenger or cargo reservation personnel and engineering personnel, who performs functions that may indirectly impact the movement of cargo, COMAT, baggage, passengers, or mail should also be trained.]

In addition to giving sufficient consideration for the new proposed provision as shown in Part 1; 4.1.2 of DGP.26/WP/39:

The employer [must/should] establish and maintain a dangerous goods training programme for personnel who may not perform any function described in these Instructions but do perform functions related to the movement of cargo, baggage, passengers, or mail. The aim of the programme is to ensure personnel are competent to perform functions aimed at preventing undeclared dangerous goods or dangerous goods not permitted from being carried on an aircraft.

1.7 Realistically, there is a high probability that maintenance aviation organizations will get involved in the process of air transport of dangerous goods (such as handling, storage, preparation of the supporting documents and/or the preparation of the dangerous goods transport documents itself); hence, dangerous goods training for personnel of maintenance aviation organizations, we believe is a must, commensurate with their job responsibilities.

1.8 Given the seriousness of this dangerous goods incident, the high probability for maintenance aviation organizations to get involved in the process of air transport of dangerous goods and the associated potential safety implications, we believe that dangerous goods training for personnel in areas such as engineering and maintenance, is a must.

2. RECOMMENDATION

2.1 Personnel employed and/or interacting with the aviation industry in areas such as passenger and cargo reservation centres, and engineering and maintenance, except when acting in a capacity identified in Tables 1-4 or 1-5, must be provided with dangerous goods training commensurate with their job responsibilities in accordance with Part 1;4.2 of the Technical Instructions. Or, as per the new proposed provision as shown in Part 1;4.1.2 of DGP.26/WP/39: “The employer must establish and maintain a dangerous goods training programme for personnel who may not perform any function described in these Instructions but do perform functions related to the movement of cargo, baggage, passengers, or mail. The aim of the programme is to ensure personnel are competent to perform functions aimed at preventing undeclared dangerous goods or dangerous goods not permitted from being carried on an aircraft.”

3. ACTION BY THE DGP

3.1 The DGP is invited to agree to mandate dangerous goods training as defined in paragraph 2 (Recommendation) of this working paper.

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