



DGP/27-IP/14
13/9/19

DANGEROUS GOODS PANEL (DGP)

TWENTY-SEVENTH MEETING

Montréal, 16 to 20 September 2019

Agenda Item 8: Coordination with other panels
8.1: Flight Operations Panels (FLTOSP)

UPDATE ON AIRWORTHINESS PANEL ACTIVITIES

(Presented by the Secretary of the Airworthiness Panel (AIRP))



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Update on the Airworthiness Panel (AIRP) Activities

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Secretary to the AIRP

DGP/27 Panel Coordination
Montréal, 12 Sept 2019





AIRP Job Cards with DGP in a supporting role

“Cargo compartment fire suppression provisions” -

Job-card AIRP.011.01

- Task 9725 & 9831 is to review and possibly propose amending the SARPs under Annex 8 Parts IIIA and IIIB for manufacturers to specify the cargo compartment fire suppression capabilities needed for operators to determine the limitation of specific aircraft fire suppression systems
 - No changes to Part IIIA are proposed since this is a historical document.
 - Annex 8, Part IIIB - Completed draft language which will be sent to the full AIRP for comment.
 - Annex 8, Parts IV (Helicopters) & VB (small aeroplanes) review still open.

Title	Cargo compartment fire suppression provisions	Reference	AIRP.011.01
Source	AIRP/3 Report, Air Navigation Commission (200-13, 201-5, 6 and 8)		
Problem Statement	Risks posed by the transport of cargo by air may not be sufficiently mitigated because: <ul style="list-style-type: none"> a) Annex 18 and the Technical Instructions base risk mitigation at the package level without taking the aircraft's cargo compartment fire suppression capabilities fully into account. These risk mitigators may be incomplete they may be challenging to do because information on cargo compartment fire suppression capabilities is not readily available; and, b) a number of variables needed to quantify the risk of an occurrence involving Dangerous Goods (DG) are unknown, making it impossible to fully comply with the Annex 8 requirement for DG to be taken into account when designing cargo compartment fire suppression systems. 		
Specific Details (including impact statements)	Annex 8, Part IIIA § 4.1.6.g) and Part IIIB § 4.2.g) requires the effects of an explosive or incendiary device or DG to be taken into account in the design of cargo compartment fire suppression systems in large aeroplanes. Current design codes, such as FAR § 25.795 or CS 25.795, clearly address the threat from a well-defined explosive or incendiary device but do not explicitly consider the threat from DG as cargo. Explicitly considering the threat is difficult to do because the outcome of an occurrence involving DG is dependent on a number of variables including the types and quantities of DG involved, cargo compartment load factors, cargo compartment load configuration and aeroplane types. Many of these variables are unknown during the aircraft design phase, making it impossible to quantify a fixed threat. Adding to this concern is the fact that Annex 18 and its associated <i>Technical Instructions for the Safe Transport of DG by Air</i> base risk mitigation at the package level and do not explicitly take the aircraft's cargo compartment fire suppression capabilities fully into account. The limitations of the cargo compartment fire suppression systems have not been characterized for the threat from shipments containing DG. Additionally, the baseline information of aircraft needed for operators to determine the limitation of specific cargo compartment fire suppression capabilities is not readily available. The DG provisions do distinguish between passenger and freighter aircraft whereby some additional restrictions are applied to the former, but they do not differentiate between different cargo compartment types and associated cargo compartment protection capabilities. These capabilities include fire suppression systems as well as fire containment features. Mitigating at the package level was considered effective when the DG provisions were originally developed some forty years ago because of the ability of aircraft protection features to control the possible effects from an occurrence involving the quantities and types of DG being transported. At that time, DG made up a very small percentage of cargo and were often chemical substances with established criteria for effectively identifying hazards. Today the quantity of DG has significantly increased, with a large number of DG being articles such as lithium batteries whereby criteria for effectively identifying the hazards they pose have yet to be established. This has introduced new threats to flight safety which may not be sufficiently mitigated. Experience from accident and incident investigations has shown that the hazards posed by an individual package of DG may not be the only contributing factor. The cumulative effect of DG and general cargo may also be a contributing factor. The involvement of other dangerous material could easily lead to an exponential increase in risk commensurate with the cumulative energy, mass, and volume of the material involved which could potentially overwhelm what would normally be an effective aeroplane protection function. The current DG provisions do not adequately account for the diversity in airworthiness certification standards and operations limitations. A multidisciplinary approach involving airworthiness, flight operations and DG experts is needed to identify limitations between minimum performance design standards, operations and risks posed by DG. Criteria need to be established, taking these limitations into account, for determining whether DG can be transported safely by air. This may result in amendments to some or all of the associated Annexes.		
Expected Benefit	Clarification about the large aeroplanes design capability related to cargo compartment fire protection provisions in Annex 8 under PART IIIA and IIIB will lead to a significant improvement in safety by ensuring adequate information as relevant to aeroplanes' airworthiness design standpoint (Annex 8) being made available and taken into account in Annex 18. The resulting complementary information will facilitate the development by operators of the risk assessment for the carriage of DG by air. An additional benefit, such as providing accurate data in the overall regulatory scheme in Annex 18, to facilitate the proper packaging of DG, is expected.		
Reference Documents	Annex 8 Doc 9750 – Airworthiness Manual, Annex 18, Doc 9204 – Technical Instructions For The Safe Transport of DG by Air, FAR/CS 25.795 and related advisory material, Job cards - DGP 003.01, FLT/OPSP 043.01.		Attachments



AIRP Job Cards with DGP in a supporting role

Cargo compartment fire suppression provisions” -

- **Task 9726 is to develop guidance material to explain, if necessary, the design of the current cargo compartment fire suppression functions**
 - This guidance material was developed by the Cargo Safety Sub-Group (CSSG) to support their work on changes to Annex 6, Part I.
 - Member of WG-4 were involved in the drafting of the guidance material developed by the CSSG.
 - Additional changes will be required once the SARPs developed under Tasks 9725 and 9831 are completed.
- **Task 9828 is to review and possibly propose provisions for manufactures to specify the cargo compartment fire suppression capabilities needed for operators to determine the limitations of specific aircraft fire suppression systems for Annex 6, Part I.**
 - The requirements for manufacturer to provide the information to facilitate a risk assessment belongs in Annex 8 since Annex 6 is not applicable to the manufacturers.
 - The language that requires the operator to gather this information is in the proposed changes to Annex 6, Part I developed by the CSSG. This Task is completed.



AIRP Job Cards with DGP in a supporting role

Carriage of active battery powered devices inside aircraft cargo compartment.

Job-card AIRP.012.01

- Control of electromagnetic radiation risks posed by the carriage of battery-powered devices in baggage, cargo and mail that are active when inside the aircraft cargo compartment
 - Sources of potential EMI with aircraft systems.
 - Recognizing the EMI risk posed to aircraft systems during operations and in particular during critical phases of flight, the AIRP was tasked via the job card AIRP 012.01.

Title	Control of electromagnetic radiation risks posed by the carriage of battery-powered devices in baggage, cargo and mail that are active when inside the aircraft cargo compartment		Reference	ARP 012.01		
Source	Secretariat, DGP 25, ANC 2015					
Problem Statement	Many items carried in aircraft cargo compartments, including unit load devices, cargo, mail and passenger baggage now contain, or are fitted with battery-powered devices that are operational (active) throughout the transport chain, including when inside the aircraft during flight. These devices, when active, emit electromagnetic radiation that could have the potential to affect the aircraft systems thereby compromising flight safety.					
Specific Details (including impact statements)	Battery-powered devices are increasingly being used by consignors of air cargo for use in items such as tracking devices and temperature data loggers which are placed in the aircraft cargo and which remain active throughout the entire transport journey, including when inside the aircraft during flight. The use of some of these devices, such as temperature data loggers is a regulatory requirement for some commodities, such as pharmaceuticals, and therefore the shipper is obliged to have these devices in their air cargo to comply with applicable regulations. The air operators and/or equipment manufacturers are also using battery-powered devices that are attached to aircraft unit load devices (ULDs) or use ULDs that are fitted with battery-powered devices such as refrigeration/heating units. There is also a move to the use of so-called permanent baggage tags or other devices in passenger baggage fitted with batteries, which remain active when inside the aircraft. The concern with the specific devices and the accumulation of these devices in the cargo compartment are the electromagnetic radiation that may be emitted by the devices when active and the potential effect on aircraft systems. To address this potential risk, it is believed that the ARP should develop specific SARPs and/or guidance material.					
Expected Benefit	Safe transport aboard aircraft of cargo, mail and passenger baggage that contains active battery-powered devices.					
Reference Documents	ICAO Cir. 340 AN/198, Guidelines for the Expanded Use of Portable Electronic Devices FAA Advisory Circular AC 91 21-1C, Use of Portable Electronic Devices Aboard Aircraft EASA AMC and GM to CAT GEN MPA 140, Portable Electronic Devices			Attachments		
Primary Expert Group	ARP					
WPE No.	Document affected	Description of Amendment proposal or Action	Supporting Expert Group	Expected dates:		
				Expert Group	Effective	Applicability
	Action	Determine the need for Standards / Guidance to control the risk of transporting battery-powered devices in baggage, cargo and mail that are active when inside the aircraft cargo compartment.			Q2/2017	
	Annex 6 and/or 8	Develop provisions if required to control the risk of transporting battery-powered devices in baggage, cargo and mail that are active when inside the aircraft cargo compartment	DGP FLT OPSP, SMP	Q4/2017	2019	2020
	Associated Manual/Doc/Circular	Develop guidance material if required to control the risk of transporting battery-powered devices in baggage, cargo and mail that are active when inside the aircraft cargo compartment	DGP FLT OPSP, SMP	Q4/2017	2019	
Initial Issue Date	Date approved by ANC:		Session/Meeting			
xx Nov 2016						



General Considerations Going Forward

- **General Considerations Going Forward**
 - Consider if AIRP012 focus should be recognized as a preventive (vs reactive) take on the PED focus problem - in line with action of major CAAs
 - The relative modest pace of progress is inflicting on sustainability of deliveries for AIRP012
 - A Timely & Strategic choice of “ICAO vehicle” may be needed for a viable continuation in discharging the AIRP012 mandate
- **AIRP WG1 Team**
 - Finalize collection of TCH feedback/questionnaire
 - Liaise with WG 2/4 based on above results and identify relevance to Annex8 and/or Doc9760 provisions
 - Coordinate concluding WP for presentation to AIRP/7
- **Secretariat**
 - Liaise with DGP and FLTOPSP to coordinate outcomes
 - Consider a coherent/consistent/harmonized ICAO approach to the PED issue through dedicated guidance material (Manual?) to centralize existing PED guidance (e.g. Circ340) with outcomes from AIRP012.



AIRP/6-WP/12

The issue

- potential weakness in awareness of responsibilities related to dangerous goods.
- The AIRP was invited to consider how to raise awareness of dangerous goods responsibilities among AMOs.

AIRP conclusions

- It was concluded that it might be an unnecessary cost burden to include SARPs related to training requirements for AMOs on Dangerous Goods (DGs) especially where the AMO is just one part of the control shipping/supply chain.
- Additionally, the frequency in which an AMO ships DG may not warrant the need to regulate training in this area.
- The meeting suggested that guidance could be provided to States to strengthen awareness of dangerous goods responsibilities for personnel employed by or interacting with the aviation industry in areas of engineering and maintenance .



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The DGP/27 is invited to:

Take note of the Updates from the Airworthiness Panel work Programme.

continue to collaborate with the AIRP as necessary.



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THANK YOU