



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/16)**

Montreal, 17 to 21 October 2016

Agenda Item 6: Other business

COMMENTS ON DGP-WG/16-WP/33 – DANGEROUS GOODS INFORMATION IN FIXM

(Presented by D. Brennan)

SUMMARY

This working paper offers comments on DGP-WG/16-WP/33 with respect to the consideration of provision of detailed dangerous goods information in the flight plan.

Action by the DGP-WG: The DGP-WG is invited to:

- a) Advise the Air Traffic Management Requirements and Performance Panel (ATMRPP) that the addition of dangerous goods data into the flight plan is not warranted based on the significant cost and the very limited benefit.
- b) Recommend that there should be alignment between the content of the PANS-ATM and the Technical Instructions with respect to dangerous goods. This may necessitate revision to the PANS-ATM to remove reference to provisions or recommendations that are not consistent with the provisions of the Technical Instructions.
- c) Invite the ATMRPP and/or other appropriate ICAO group to consider what dangerous goods information may be of value to ATM and/or airport rescue fire-fighting (ARFF) for certain types of dangerous goods such as explosives normally forbidden when carried under an exemption.

1. INTRODUCTION

1.1 Working paper DGP-WG/16-WP/33 submitted by the Air Traffic Management Requirements and Performance Panel (ATMRPP) seeks the input of the DGP with respect to considerations by the ATMRPP on information that should be provided in the flight plan with respect to dangerous goods carried on board an aircraft and just what data elements should be included.

1.2 The view of this panel member is that the ATMRPP position assumes that dangerous goods information should be part of the data with the flight plan, notwithstanding that at least once previously the DGP has offered the opinion that providing any indication of dangerous goods carried on an aircraft is problematic and there needs to be a clear safety case made for the need for dangerous goods information to be part of the flight plan in the first place.

1.3 The discussions that appear to have taken place by the ATMRPP and indeed the information that has been added into the *Procedures for Air Navigation Services — Air Traffic Management* (PANS-ATM, Doc 4444), Appendices 2 and 3 and the use of the “STS/HAZMAT” code to be added into field 18 on the flight plan would indicate that there is a lack of coordination across different ICAO panels. To address this there needs to be better efforts within the ICAO Secretariat to ensure that issues or proposals that impact on other Annexes, Recommended Practices or guidance material should be brought to the attention of the relevant panel in advance of any decision to revise such Annex, Recommended Practice or guidance material.

1.4 To the specifics in working paper DGP-WG/16-WP/33, the summary states that the objective of the review of the content of a flight information exchange model (FIXM) was to eliminate the potential for unjustifiable costs for air traffic services providers and airspace users. However, the proposal to include as part of the flight plan data all the information related to dangerous goods carried as cargo on all flights would represent a very significant cost to operators (airspace users) and to air traffic services providers with no significant safety benefit. For this reason alone we do not support including dangerous goods data with the flight plan.

1.5 The DGP has always recognized that it is vitally important for airport rescue fire-fighting (ARFF) services to be provided with information on the dangerous goods carried as cargo as soon as is possible. The provisions in Part 7;4 of the Technical Instructions have been revised over the years to improve the process of providing the information on the written information to the pilot-in-command (NOTOC) to ARFF.

1.6 The most recent revision to Part 7;4.1 was in the 2013-2014 edition of the Technical Instructions, which required that with effect 1 January 2014 the information on the NOTOC must be available to personnel with responsibilities for operational control of the aircraft, e.g. flight dispatch. The objective of the revision to require flight dispatch personnel to have access to the NOTOC was to ensure in the event of an emergency that this information could be provided to ARFF personnel at the airport at which the aircraft has arrived, or will arrive.

1.7 Since this change was implemented into the Technical Instructions there has been no indication to the DGP that the system in effect is inadequate and ARFF personnel are not receiving the NOTOC information in the required time.

1.8 If there was to be a requirement for the information on dangerous goods carried as cargo to be included in the flight plan this would create a significant problem for the operators. Typically the flight plan is submitted to ATC around 90 minutes prior to scheduled flight departure time. At that time the details of the cargo to be carried on the flight may not be known. Depending on the operator and the

type of cargo, the cut-off time for finalizing the load is approximately 60 to 45 minutes prior to scheduled departure and for some operators may be as late as 15 minutes prior to departure. So here we have a time gap of anything between 45 and 75 minutes between when the flight plan is submitted and the actual cargo load is known.

1.9 The elements in the data dictionary in the appendix to the working paper from the Secretary of the ATMRPP far exceed the information that is available either on the NOTOC as set out in Part 7;4.1.1.1 or the dangerous goods transport document as set out in Part 5;4. As such, if there is to be any dangerous goods information provided, then it should not exceed that already on the NOTOC. Any increase in the data elements on the flight plan beyond what is on the NOTOC would only add in further costs with no justification as to the benefit.

1.10 Notwithstanding the above, there should be some discussion with ARFF as to just what information may have a potential to affect or alter the way that they will respond to an aircraft emergency. For example if an aircraft is carrying explosives under an exemption where there is a mass explosion hazard or a projection hazard then the ARFF should be made aware of this as early as possible and having information in the flight plan may be the way to achieve that. The same may apply to aircraft carrying radioactive materials under exclusive use. However, the instances of this type of flight are very, very low and it may be appropriate to put in place a system just for these flights.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to:

- a) Advise the ATMRPP that the addition of dangerous goods data into the flight plan is not warranted based on the significant cost and the very limited benefit.
- b) Recommend that there should be alignment between the content of PANS-ATM and the Technical Instructions with respect to dangerous goods. This may necessitate revision to PANS-ATM to remove reference to provisions or recommendations that are not consistent with the provisions of the Technical Instructions.
- c) Invite the ATMRPP and/or other appropriate ICAO group to consider what dangerous goods information may be of value to ATM and/or ARFF for certain types of dangerous goods such as explosives normally forbidden when carried under an exemption.

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