



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/23)**

Rio de Janeiro, Brazil, 15 to 19 May 2023

- Agenda Item 2: Managing air-specific safety risks and identifying anomalies (REC-A-DGS-2025)**
2.2: Develop proposals, if necessary, for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2025-2026 Edition

**PROVISIONS FOR THE USE OF ELECTRONIC DATA FOR INFORMATION TO THE
PILOT-IN-COMMAND**

(Presented by D. Brennan)

SUMMARY

This working paper proposes a revision to the provision of information to the pilot-in-command to permit the transmission of electronic data to the pilot-in-command in lieu of such information in printed format.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 As presented at DGP-WG/22 (see DGP-WG/22 Report, paragraph 4.9.1.3), an amendment to allow electronic information to be provided to the pilot-in-command in accordance with Part 7;4.1.1 of the Technical Instructions was considered at DGP-WG/16 (DGP-WG/16-WP/54, paragraph 3.2.7), DGP/27 (DGP/27-WP/49, paragraph 2.2.8) and DGP/28 (DGP/28-WP/59, paragraph 2.2.8). There was support from some members on the proposal while some others agreed in principle but recognized the concerns raised by the member nominated by the International Federation of Air Line Pilots' Associations (IFALPA).

1.2 There was recognition that permitting the transmission of electronic data as the single source of information to the pilot-in-command would not only improve the accuracy and safety level but also enhance the usability of information. For instance, by enabling the transmission of electronic data, operators could consider capturing data directly from the electronic transport document to produce the electronic notification to the pilot-in-command (e-NOTOC) upon completing the mandatory acceptance checks. With the application of electronic data, it also becomes feasible for pilots to search electronically

and precisely for the necessary information without going through pages of printed NOTOC, especially for freighter operations, where the size of the NOTOC may be extensive.

1.3 Meanwhile, it was necessary to evaluate concerns raised by the member nominated by IFALPA so as to ensure that all needs are well considered while improving the overall safety level. Therefore, the International Air Transport Association (IATA) launched a survey in 2022 to approximately 100 operators, ranging from flag-carriers to domestic operators, soliciting comments on the concerns raised by IFALPA. A simple conclusion from the consultation was that operators will have the capability to transmit the data to the parties that need to receive the data as needed in addition to the pilot-in-command in a timely manner, and that the local aircraft rescue and firefighting (ARFF) had seldom been their immediate or direct point of contact but the air traffic control in case of emergency. The summary of the survey result can be found in paragraph 4.9.1.3 of the DGP-WG/22 Report.

1.4 Additionally, research on historical discussions showed that providing the information to the pilot-in-command only was not efficient enough to allow ARFF to obtain the dangerous goods information in case of emergency, and therefore, an amendment was made to Part 7;4.1 to require that the same information be provided to the flight dispatcher, who is not travelling in the same aircraft, so as to provide the information to ARFF in an expeditious manner (DGP/23 Report, paragraph 5.5.1).

1.5 After the discussion at DGP-WG/22, the Secretary of DGP also consulted the Secretary of FLTOPSP, and it was suggested that the requirements on this subject in the Technical Instructions can be modified to be more performance based, such as focussing on the information and ensuring it be readily available to flight crew and emergency responders but providing the flexibility to operators to determine the best approach to achieve that while being approved or accepted by the State of the Operator.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider the amendments in Part 7;4.1.1 to permit operators providing information to the pilot-in-command by electronic transmission in lieu of a printed document under the agreement of the appropriate national authority of the State of Operator.

APPENDIX

PROPOSED AMENDMENT TO PART 7 OF THE TECHNICAL INSTRUCTIONS

Part 7

OPERATOR'S RESPONSIBILITIES

Chapter 4

PROVISION OF INFORMATION

4.1 INFORMATION TO THE PILOT-IN-COMMAND

4.1.1 As early as practicable before departure of the aircraft, but in no case later than when the aircraft moves under its own power, the operator of an aircraft in which dangerous goods are to be carried must:

- a) provide the pilot-in-command with accurate and legible written or printed information concerning dangerous goods that are to be carried as cargo; and
- b) provide personnel with responsibilities for operational control of the aircraft (e.g. the flight operations officer, flight dispatcher, or designated ground personnel responsible for flight operations) with the same information that is required to be provided to the pilot-in-command (e.g. a copy of the written information provided to the pilot-in-command). Each operator must specify the personnel (job title or function) to be provided this information in their operations manual and/or other appropriate manuals; and

c) where an agreement exists with the appropriate national authority of the State of the Operator, the operator may provide the information to the pilot-in-command by EDP or EDI techniques in lieu of written or printed information.

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4.1.4 The information provided to the pilot-in-command must also include a signed confirmation, or some other indication, from the person responsible for loading the aircraft that there was no evidence of any damage to or leakage from the packages or any leakage from the unit load devices loaded on the aircraft.

4.1.5 The information provided to the pilot-in-command must be readily available to the pilot-in-command during flight.

4.1.6 This information provided to the pilot-in-command should be presented on a dedicated form and should not be by means of air waybills, dangerous goods transport documents, invoices, etc.

4.1.7 The pilot-in-command must indicate on a copy of the information [or the information] provided to the pilot-in-command, or in some other way, that the information has been received.

4.1.8 A legible copy of the information [or the information] provided to the pilot-in-command must be retained and readily accessible on the ground. This copy [or the information] must have an indication on it, or with it, that the pilot-in-command has received the information. Where the information to the pilot-in-command is provided by EDP or EDI techniques it must be able to be produced as a paper document without delay. A copy, or the information contained in it, must be readily accessible to the flight operations officer, flight dispatcher, or designated ground personnel responsible for flight operations until after the arrival of the flight.

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