DANGEROUS GOODS PANEL

Dubai, 31 March to 4 April 2003

REPORT OF AD-HOC WORKING GROUP ON TRAINING REQUIREMENTS

1. Mr. J. Abouchaar (IATA) facilitated the meeting; participants included the Panel members from Australia, Belgium, Canada, Italy, Japan, United Kingdom together with industry advisors from those and other States.

2. The initial discussion focused on the content of WP/16 and WP/52, and to explore the direction taken in those Working Papers.

3. There was general acceptance by those present that the use of term "freight forwarder" more clearly identified the organizations involved and the employees who were therefore subject to the training requirements.

4. The definition of "freight forwarder" proposed in WP/16 was modified to remove the words "to the public" as some freight forwarders may only offer services to other organizations. The revised definition now reads: "A person who offers the service of arranging the transport of cargo by air."

5. However, the group had difficulty with the use of the word "processing" when describing the activity involved in Keys 6 & 10. It was generally recognised that the individuals were involved in "accepting" cargo from shippers, but that the term "acceptance" implied certain responsibilities limited to operators as set out in Part 7;1. It was therefore suggested that "processing" be placed in square brackets.

6. There was general support for the adoption of an additional Note 2 to Table 1-4, as proposed in WP/16, recommending that other personnel other than those specifically identified in Table 1-4 should be provided with dangerous goods training.

7. The alternative format for Table 1-4 proposed in Annex 2 to WP/52 was seen by those present as being a more logical and ordered layout by grouping staff employed by the three defined categories of employers. The numbering proposed for the Key may however be confusing and this should be reviewed.

8. The proposal introduced in Flimsy No. 4 was briefly discussed. The direction taken by Flimsy No. 4 represented a significant departure from the traditional content of Table 1-4, which aimed to broadly group categories of staff, to a more task oriented approach. One option with the proposal in Flimsy No. 4 may be to develop this material further to become additional guidance material, possibly included in the TI Supplement, to amplify the broad classification of staff set out in Table 1-4.

9. The proposed introduction of additional categories of staff, who had no responsibility for the handling of dangerous goods, was raised as a possible concern regarding the jurisdiction of the Technical Instructions to require dangerous goods training for these persons. This issue may need to be explored in the context of Annex 18. Notwithstanding the concern raised, at least one competent authority has for some years required that persons handling only "cargo" undertake dangerous goods training on the basis of the requirements set out in the Technical Instructions.

10. The presenter briefly described the content of IP/4. This paper represents work undertaken by the Dangerous Goods European Liaison Group (DGELG) to develop standard checklists that can be used by regulators or operators to evaluate dangerous goods training programs. There was general consensus that this type of material may be of particular use to regulators and operators outside of Europe and that perhaps a formal presentation should be made to the Panel. The presenter undertook to provide this at DGP/19.

11. Finally the proposals contained in WP/30 and associated Flimsy No. 2 were discussed. The wording proposed in Flimsy No. 2 for the first sentence was further modified and agreed upon. The revised wording now reads: "Training must be provided or verified upon the employment of personnel identified in the categories specified in Table 1-4."

12. There was a recommendation that the second sentence of 1;4.2.2 was of sufficient importance that it should be moved to a stand-alone paragraph. The objectives of modifying the words in the second sentence of 1;4.2.2 were that the consequences of an individual not undertaking recurrent training within 24 months should be clearly established and that it be made clear that failing to undertake recurrent training within 24 months did not necessarily require that the individual complete an initial course. There was however, no agreement on appropriate wording to achieve these objectives.

— END —