



DANGEROUS GOODS PANEL (DGP)

TWENTY-THIRD MEETING

Montréal, 11 to 21 October 2011

Agenda Item 6: Other business

SAFETY MANAGEMENT SYSTEMS: DANGEROUS GOODS TRANSPORT

(Presented by J. McLaughlin)

SUMMARY

As part of discussions relating to safety management systems (SMS) at DGP/21, this information paper offers information on implementation of SMS in relation to dangerous goods transport oversight in the United States.

This paper contains information on a prototype operation the Federal Aviation Administration is implementing for dangerous goods transport oversight of certificate holders in the United States.

1. INTRODUCTION

1.1 At DGP/21 the Secretary recalled that the subject of SMS was discussed at the DGP Working Group of the Whole Meeting in Memphis (DGP-WG/07, 30 April to 4 May 2007) and strong support for developing provisions related to SMS was expressed. Some members suggested, however, such provisions should be recommendatory due to the difficulty in implementing a mandatory programme.

1.2 The meeting was further advised that proposals to amend Annex 1 — *Personnel Licensing*, Annex 6 — *Operation of Aircraft*, Annex 8 — *Airworthiness of Aircraft*, Annex 11 — *Air Traffic Services*, Annex 13 — *Aircraft Accident and Incident Investigation* and Annex 14 — *Aerodromes* in respect of SMS had been discussed by the Air Navigation Commission (ANC) and the proposed text for inclusion in Annex 6 was presented for the meeting's information. It was suggested that the panel consider if these provisions would be sufficient to cover the need for safety management for dangerous goods, recognizing that the latter was included frequently as a component part of operations.

1.3 In addition, the DGP Working Group of the Whole Meeting in Atlantic City (DGP-WG/11, 4 to 8 April 2011) discussed SMS in relation to dangerous goods. The secretary informed

the group that the ANC, during its review of the DGP/23 agenda, requested the DGP to consider elements of SMS within the context of data and safety reporting. The request was prompted during discussion on States' activities related to the transport of lithium batteries. The ANC stated that the introduction of some SMS elements for dangerous goods could be useful, but the Secretary reminded the ANC that the DGP had discussed SMS in general and felt that most SMS aspects of dangerous goods were covered under Annex 6. She also explained that one area which was not covered was shippers' responsibilities, but shippers are not certificate holders under Annex 6 or Annex 18.

2. IMPLEMENTATION OF SMS FOR CERTIFICATE HOLDERS

2.1 In March of 2006, ICAO amended Annex 6, Part I, which addresses the operation of airplanes in international commercial air transport. Member States agreed to establish an SMS requirement for air carriers. The SMS, as outlined in this Annex, includes processes to identify safety hazards and ensure the implementation of risk controls and corrective actions necessary to maintain safety performance. Compliance with this amendment was January of 2009 and subsequently amended to 2012.

2.2 In November of 2010, the Federal Aviation Administration (FAA) issued a Notice of Proposed Rulemaking (NPRM) titled "Safety Management Systems for Part 121 Certificate Holders." The NPRM proposed that certificate holders develop and implement an SMS to improve the safety of their aviation related activities. In addition to this NPRM, industry guidance and guidance to FAA safety inspectors was published. The NPRM and guidance is in alignment with the ICAO SMS framework. The stakeholder comment period for this NPRM ended in March of 2011 and a Final Rule is pending.

2.3 In concert with the release of the SMS NPRM, the FAA initiated an "SMS Pilot Project" that included 26 certificated operators varying in size and complexity and more have joined this project since its initiation.

3. SMS AND OVERSIGHT OF CERTIFICATE OLDERS AND DANGEROUS GOODS TRANSPORT BY AIR

3.1 The United States recognizes that dangerous goods transport operations in aviation must be included in SMS for operators and state oversight programmes. In support of SMS programme development, the FAA has initiated a prototype surveillance programme to include dangerous goods surveillance operations of certificate holders in the United States.

3.2 Working in concert with Aviation Flight Safety Office (the Operations Oversight Organization in FAA) dangerous goods inspectors will be supporting overall certificate oversight in relation to dangerous goods transport operations to include the acceptance, rejection, handling, storage incidental to transport, company materials (COMAT) and loading.

3.3 An SMS training programme for managers and safety inspectors has been developed and dangerous goods programme managers and inspectors are being trained in SMS principles utilized by certificate holders and state oversight programmes. Principal inspectors and managers in the areas of operations, maintenance, airworthiness and dangerous goods responsible for the oversight of certificate operations will collaborate and analyze safety related information in support of developing tailored surveillance plans for each certificate holder. Surveillance inspection data will be entered into common

databases utilized for safety risk management. These systems possess analysis capabilities to identify hazards, assess risk and prioritize surveillance resources in support of certificate and safety management.

3.4 The prototype surveillance programme for dangerous goods transport oversight is set to begin operations in October of 2011 with the main goal of implementing a complete SMS programme, to include dangerous goods, for all certificate holders in the United States.

3.5 We feel that this is going to be beneficial to the FAA oversight program. While the broader FAA safety oversight programs have been addressing SMS implementation this has primarily been done absent the oversight of dangerous goods transport requirements. We will now be entering data into a common system and all aspects of a certificate holder's operations will be considered when analyzing safety related data. The overall benefit to the FAA and the certificate holder is that now all safety related data gathered through surveillance activity will be considered within an SMS framework.

4. **CONSIDERATION BY THE DGP**

4.1 The United States would like to continue to share information concerning this SMS prototype programme for dangerous goods with the DGP and welcomes any interest, questions or comments concerning oversight of dangerous goods transport within an SMS framework.

4.2 The United States is interested in any feedback from States that have completed or are in the process of implementing SMS framework for dangerous goods transport. Since the air transport system in the United States is very large in scope, we would greatly appreciate any information or "lessons learned" concerning SMS and dangerous goods.

4.3 We will continue to update the DGP on the progression of our SMS implementation for the oversight of dangerous goods transport.

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