



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-THIRD MEETING

Montréal, 11 to 21 October 2011

Agenda Item 5: Resolution, where possible, of the non-recurrent work items identified by the Air Navigation Commission or the panel:

Agenda Item 5.3: Review of provisions for information to the pilot-in-command

PROPOSED AMENDMENTS TO NOTICE-TO-PILOT-IN-COMMAND PROVISIONS

(Presented by J. McLaughlin)

SUMMARY

This paper proposes amendments to notice-to-pilot-in-command provisions under Part 7;4 of the Technical Instructions for the DGP's consideration.

Action by the DGP: The DGP is invited to consider discussions held with the OPSP Secretary on the role of the flight dispatcher in managing information provided in the NOTOC. An information paper on these discussions will be provided in conjunction with this working paper. Assuming such an approach will be suitable and to allow for proper consideration by the panel prior to DGP/23, the DGP may wish to consider the following approach in Part 7;4.1 of the Technical Instructions. Part 7;4.1.1 would be amended as proposed in the appendix to this working paper.

1. INTRODUCTION

1.1 The DGP has devoted considerable time and attention to issues associated with the Notice-to-Pilot-in-Command (NOTOC) during this biennium. This review has considered information requirements, processes associated with the NOTOC, and what technological developments could be leveraged in order to better address the informational needs of pilots and airport rescue and fire fighting personnel (ARFF).

1.2 Pilots, represented by the International Federation of Air Line Pilots' Associations (IFALPA), have urged the DGP to maintain all required information on the NOTOC. At a June 2011 Rescue and Firefighting Working Group meeting associated with the Aerodromes Panel (AP), we understand that ARFF experts expressed concern over making amendments to the information currently required under Part 7;4 of the Technical Instructions. Meeting notes and/or a report have not

been published as of the submission date of this paper, but these sentiments align with other discussions held with ARFF experts. Such a position is understandable, especially in light of numerous and unpredictable emergency response scenarios that ARFF personnel may be called upon to address. The exact information required can be dictated by the type of aircraft, type of operation, weather, ARFF resources, as well as the precise nature of dangerous goods transported.

1.3 Some acknowledge that ARFF personnel require more information about dangerous goods than a pilot in certain emergency situations. For operators and their pilots who believe some NOTOCs have more information than can be safely utilized during an emergency and wish to have a document with less dangerous goods information provided, this course of action is permitted. Although this would also include a copy of all the required information in addition to a summary, a summary is permitted and should be included if there is a safety concern. In fact Part 7;4.1.9 of the Technical Instructions already provides this recommendation:

4.1.9 In the event that the volume of information provided to the pilot-in-command is such that in-flight radiotelephony transmission would be impracticable in an emergency situation, a summary of the information should also be provided by the operator, containing at least the quantities and class or division of the dangerous goods in each cargo compartment

1.4 At the DGP Working Group of the Whole Meeting in Atlantic City (DGP-WG/11, 4 to 8 April 2011), the panel member nominated by the United States proposed that flight dispatchers be required to have information provided in the NOTOC (DGP-WG/11-IP/8 refers). The intent of this proposal was to allow ARFF personnel to have NOTOC information provided to them in an expeditious manner. Flight dispatchers already share responsibility with the pilot for many aspects of a flight, including emergency situations. In fact, it is possible to read Annex 6 — *Operation of Aircraft* Part 4;6 as already requiring the dispatcher to serve in this capacity. Moreover, this proposal reflects the current practices of many operators. At the DGP-WG/11, it was determined that it would be important to coordinate with the Operations Panel (OPSP), as requirements for the flight dispatcher reside in Annex 6. Discussions with the OPSP Secretary on this issue continue. Strong consideration is being given to placing a note in Annex 6 Part 4;6, clarifying that a flight dispatcher already has responsibilities with respect to the NOTOC. Additional information on these discussions will be able to be provided at DGP/23.

1.5 The approach presented in this paper would require that pilots, dispatchers, the operator's station of departure, and the operator's intended arrival station have all information currently required under Part 7; 4 of the Technical Instructions.

1.6 By expanding into flight planning documents, the DGP would realize a secondary benefit of better positioning itself to leverage air traffic management systems, such as the briefing on FAA's Flight Object presented at DGP-WG/11as, even though using different terms, these systems are being proposed globally. In the future, it is likely that more information will be able to be shared in a more effective and efficient systematic approach.

APPENDIX

Part 7

OPERATOR'S RESPONSIBILITIES

...

Chapter 4

PROVISION OF INFORMATION

...

4.1 INFORMATION TO THE PILOT-IN-COMMAND

4.1 INFORMATION TO THE PILOT-IN-COMMAND

4.1.1 The operator of an aircraft in which dangerous goods are to be carried must provide the pilot-in-command and the flight dispatcher, as early as practicable before departure of the aircraft, with accurate and legible written or printed information concerning dangerous goods that are to be carried as cargo.

Note.— This includes information about dangerous goods loaded at a previous departure point and which are to be carried on the subsequent flight.

...

— END —