



## **DANGEROUS GOODS PANEL (DGP)**

### **TWENTY-FOURTH MEETING**

**Montréal, 28 October to 8 November 2013**

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

**5.3: Dangerous goods requirements in Annex 6 — *Operation of Aircraft***

#### **SAFETY MANAGEMENT SYSTEMS: DANGEROUS GOODS TRANSPORT**

(Presented by C. Glasow)

##### **SUMMARY**

As part of discussions relating to Safety Management Systems (SMS) this Information Paper provides an update on implementation of SMS in relation to dangerous goods transport oversight in the United States.

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

#### **1. IMPLEMENTATION OF SMS FOR CERTIFICATE HOLDERS**

1.1 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 mandated for January of 2009 and subsequently amended to 2012.

1.2 In November of 2010, the 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 departmental review.

1.3 The FAA also has initiated an “SMS Pilot Project” that air carriers can voluntarily participate in while the SMS Rulemaking is in process. This pilot project has over 185 active FAA certificate holders at varying levels of SMS implementation. The FAA Hazardous Material Safety Program has been working under a pilot program scheduled to conclude this year with long term changes being proposed to continue the processes.

## 2. **IMPLEMENTATION OF SMS/SSP INTO FAA HAZARDOUS MATERIALS SAFETY PROGRAM OFFICE**

2.1 The FAA issued an Order in May, 2013, that specifically directed the Hazardous Materials Safety Program Office in the Office of Security and Hazardous Materials of the FAA to develop and implement an SMS/SSP for the Office. This SMS/SSP will enhance previously existing surveillance operations of dangerous goods certificate holders in the U.S. and enable the Office to more efficiently manage resources for dangerous goods inspections.

2.2 The Hazmat Office has completed a full scale review of its organizational structure, policies and procedures involving workplace issues, oversight and inspections, data collection and usage, and enforcement. Since the Hazmat Office’s mission has been, since its inception, to ensure the safe transport of hazardous materials by air, many of its current programs satisfy different components of the SMS/SSP.

2.3 During this Organizational review, the Hazmat Office has developed its Safety Policy, establishing the Assistant Administrator’s commitment to implementing SMS, is conducting a Gap Analysis, and is developing a protocol for safety risk management (SRM) that will fit into the larger FAA SRM database in development.

2.4 An SMS training programme for managers and safety inspectors has been developed and personnel continue to be trained in SMS principles utilized by certificate holders and State oversight programmes.

2.5 The Office’s SMS implementation is being done simultaneous with the FAA’s overall work on SMS/SSP implementation. The FAA is doing the initial framework for setting up the agency-wide SMS/SSP. Thus, the Hazmat Office’s SMS will need to work together with the broader FAA SMS, especially in the area of Safety Risk Management, Safety promotion and Safety assurance.

2.6 Working in concert with Aviation Flight Safety Office (the Operations Oversight Organization in FAA) Hazardous Material Inspectors (HMI) are 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. Information from these oversight inspections are being entered into a shared database with the Aviation Flight Safety Office and is used by HMI in both offices to provide safety oversight to the carrier. This has been very beneficial to the FAA oversight program. Working with the Flight Safety Office and populating a common data system provides the FAA with a comprehensive overview of all safety related data, including dangerous goods, gathered through surveillance activity within an SMS framework.