

**DANGEROUS GOODS PANEL (DGP)**

**NINETEENTH MEETING**

**Montreal, 27 October to 7 November 2003**

**Agenda Item 2 Development of recommendations for amendments to the Technical  
: Instructions for incorporation in the 2005/2006 edition**

**INSPECTIONS**

(Presented by G.A. Leach)

**1. BACKGROUND**

1.1 At DGP-WG03, it was agreed that suitable text should be developed for the guidance of States in respect of the conducting of dangerous goods inspections. This paper offers text for consideration by the Panel for inclusion in the Supplement to the Technical Instructions:

Start of new text:

**Guidance to states on dangerous goods inspections**

Annex 18 [to the Chicago Convention, "The Safe Transport of Dangerous Goods by Air"], requires states, inter alia, to establish inspection procedures with a view to achieving compliance with its dangerous goods regulations. The following guidance is offered to assist primarily in the inspection of operators and handling agents, although it is recognised that in some states it may be possible to conduct inspections on freight agents and shippers. For the purposes of this guidance and to align with the terminology used in Annex 18, "inspection" should be regarded as synonymous with "audit".

1.2 There are a number of aspects related to the carriage of dangerous goods by air which may be the subject of inspection:

**ORGANISATION AND PROCEDURES**

The aim of the inspection is to assess the suitability of the organisation and procedures established by the operator and of the facilities provided for the handling of dangerous goods, taking into account the nature and scale of the operation. If the operator uses a handling agent, the liaison between them needs to be checked to confirm that each knows what is expected of them by the other.

The inspection needs to confirm that the operator has sufficient resources for the intended operation and has identified those individuals who have specific responsibilities and has made them aware of their responsibilities. It will ensure that reference manuals are up-to-date and available to staff who will need to use them. The manner of loading and stowage on aircraft is checked to ensure it is carried out according to the requirements.

1.3 A form suitable for this type of inspection is at Appendix I.

### **CONSIGNMENT INSPECTION**

The aim of checking consignments of dangerous goods is to determine that, as far as can be ascertained from an external check, the packages and their associated documents comply with the requirements; it also aims to determine, as far as possible, that associated documentation (e.g. air waybill, dangerous goods transport document, acceptance check list, written notification to commander) meets all applicable requirements. Inspections are carried out in the operator's or handling agent's premises and after the dangerous goods have been accepted for transport or whilst they are still in the care of the operator or handling agent.

Both export and import consignments are to be inspected but with the emphasis on export consignments since, if a consignment is found which does not comply with the requirements, action can be taken to prevent it from being loaded on an aircraft and investigation made into how it was offered for transport and accepted in the state in which it has been found. Import consignments are also to be checked, since although they have been carried by air, the finding of evidence of non-compliance with the requirements needs to be reported to the State where the goods were originally loaded on an aircraft.

### **OPERATIONS MANUAL AND OTHER STAFF INSTRUCTIONS**

A check of the Operations Manual and other staff instructions should be made during the organisation and procedures inspection referred to above. The Technical Instructions require the Operations Manual or other manuals to contain certain information when the operator intends to carry dangerous goods. In addition to this information, the Operations Manual needs to contain sufficient guidance material and instructions to enable all those concerned (both ground staff and flight and cabin crew) to meet their responsibilities. The Operations Manual inspection aims to confirm the information provided is adequate, complete and up-to-date; also that any handling agent has copies of the relevant parts of the manual or other instructions concerning the operators policy and procedures.

When an operator does not intend to carry dangerous goods, the Operations Manual should still be checked to ensure it contains information about the policy of the operator in regard to dangerous goods and instructions about the carriage of passengers with dangerous goods.

### **STAFF TRAINING**

A training inspection is to confirm that all relevant staff of the operator or handling agent have been trained, that the training has been to the required standard and given within the required periods.

### **TRAINING PROGRAMMES**

The Technical Instructions require that the operator's training programmes for all staff be approved. The inspection is to confirm that training meets the requirements of the Technical Instructions.

Depending on the size of the operator and the responsibilities of his staff, there may be several different training programmes, since the areas covered by the training and the depth to which they are covered will depend on the responsibilities of the persons concerned. Even if the operator does not carry dangerous goods there is still a need for training programmes for both operational and ground staff involved in dealing with passengers and their baggage. The dangerous goods training for such staff may be included with the training in, for example, safety and emergency procedures.

### **PASSENGER WARNING NOTICES**

The Technical Instructions requires notices, warning passengers of the prohibition on dangerous goods in baggage, to be prominently displayed and in sufficient number so that passengers see them during their normal progression through departure procedures. The method of inspecting notices is to check those areas in terminals where the operator (or his handling agent) issues tickets, checks in passengers and assembles them to board an aircraft. A form suitable for this purpose is at Appendix II.

### **RESULTS OF INSPECTIONS**

The results of a dangerous goods inspection are recorded so as to produce a record of what was seen and noted at the time. The record should be sufficiently comprehensive to identify any faults or deficiencies, since these will need to be identified in a request to the operator to take action to remedy them. The request to the operator should include a time scale for taking remedial action.

### **FREQUENCY OF INSPECTIONS**

The Technical Instructions does not specify the frequency of such inspections. However, the "Manual of Procedures for Operations Inspection, Certification and Continued Surveillance", produced by ICAO, recommends that all significant aspects of the operator's procedures and practices should be inspected at least once in every twelve-month period. Consequently, states should consider inspecting all aspects related to dangerous goods of an operator engaged in the carriage of dangerous goods as cargo on an annual basis, as a minimum. Operators choosing not to carry dangerous goods as cargo may be inspected at a less frequent rate.

— — — — —



**APPENDIX A**

**DANGEROUS GOODS AUDIT FORM**

***Name of Operator:*** \_\_\_\_\_  
***Inspector:*** \_\_\_\_\_  
***Date(s) of Inspection:*** \_\_\_\_\_  
***Location:*** \_\_\_\_\_

**Principle Operator/Handling Agent Personnel involved:** \_\_\_\_\_  
\_\_\_\_\_

The objective of the audit is to demonstrate that the operator has procedures in place, either on his own account and/or through his handling agent(s), to ensure the correct processing and handling of dangerous goods.

During the audit, if non-conformities are identified, they shall be entered against the applicable requirement in the “Non-Conformities” section in Appendix A. Where there is a non-conformity for a requirement that is not shown in Appendix A, it shall be added in the space provided. Observations, which are not non-conformities against a requirement or a procedure, shall be entered in the “Observations” Section.

At the end of the audit, the non-conformities and observations shall be discussed with the operator to ensure that they are understood, together with the need for action to be taken within the applicable timescales. The Inspector and a responsible person of the operator should then sign the Appendix in the spaces provided. The original shall be left with the responsible person, with a copy retained by the Inspector.

Level 1: Means any non-compliance with the Technical Instructions, which would lower the standard and probably hazard an aircraft or personnel. Depending on the extent of the Level 1 finding, consideration should be given to prohibiting the operator from carrying dangerous goods until corrective action has been taken.

Level 2: Means any non-compliance with the Technical Instructions, which could lower the standard and possibly hazard an aircraft or personnel. The corrective action period granted by the National Aviation Authority should be appropriate to the nature of the finding but in any case initially not more than three months.

Level 3: Means an observation intended to give background information. Level 3 must not include information suggesting non-compliance with the requirements of the Technical Instructions. No regulatory action is required to be taken in the case of level 3.

<b>Ref</b>	<b>Summary of Requirement</b>	<b>Technical Instructions Reference</b>	<b>Audited</b>	<b>Non-Conformity</b>	<b>Level</b>	<b>Details Of Non-Conformity (Continued below where necessary)</b>
1	Dangerous goods/ munitions of war permissions, approvals or exemptions (held and correct)	N/A	"	"		Verify approval held if appropriate to State
2	Provision of information to handling agents	7;4.2	"	"		Verify manuals, staff instructions etc are provided
3	Information about dangerous goods contained in the Operations Manual/ other manuals	7;4.2	"	"		Verify information is present, correct and current
4	Provision of relevant manuals and instructions to cargo and operations staff	7;4.2	"	"		Verify manuals, staff instructions etc are provided
5	Up-to-date copies of dangerous goods manuals (e.g. ICAO/IATA)	1;1.2	"	"		Verify copy held and which edition
6	Procedures for loading and stowing medical aid for a patient, and provision of information to handling agents	7;4.2	"	"		Verify procedure available
7	Compliance with requirements for "combi" aircraft where main deck hold is not at least Class B (exemption / approval or prohibition) and provision of information to handling agents	7;2.1	"	"		Verify compliance, if applicable
8	Procedures for notification by pilot in command to air traffic services in the event of an in-flight emergency	7;4.3	"	"		Verify availability
9	Emergency response guidance information on board aircraft	7;4.8	"	"		Verify availability

Ref	Summary of Requirement	Technical Instructions Reference	Audited	Non-Conformity	Level	Details Of Non-Conformity (Continued below where necessary)
10	Procedures for reporting of dangerous goods accidents, incidents and undeclared / misdeclared dangerous goods, and liaison between handling agent / operator	7;4.4 & 7;4.5	"	"		Verify arrangement between operator and handling agent established to ensure reporting to appropriate authorities
11	Procedures for immediate notification to the competent authority of dangerous goods on board an aircraft in event of aircraft accident or incident	7;4.6	"	"		Verify arrangement between operator and handling agent established to ensure reporting to the State in which the accident occurred
12	Adequacy and standard of flight crew training	1;4.1.2	"	"		To be verified
13	Adequacy and standard of cabin crew training (including emergency response training)	1;4.1.2	"	"		To be verified
14	Adequacy and standard of ground staff training (including emergency response training)	1;4.1.2	"	"		To be verified
15	Dangerous goods training records maintained	1;4.2.4	"	"		To be verified
16	Currency of ground staff training	1;4.2.2	"	"		To be verified
17	Currency of flight/ cabin crew training	1;4.2.2	"	"		To be verified
18	Training of security staff employed by the operator (for both cargo and passengers)	1;4.1.1g)	"	"		To be verified if applicable
19	Awareness of requirements by maintenance staff in respect of replacements or unserviceable items	1;2.2.2 & 1.2.2.3	"	"		To be verified

<b>Ref</b>	<b>Summary of Requirement</b>	<b>Technical Instructions Reference</b>	<b>Audited</b>	<b>Non-Conformity</b>	<b>Level</b>	<b>Details Of Non-Conformity (Continued below where necessary)</b>
20	Provision of information / instructions on dangerous goods and passengers to passenger handling staff	7;4.2 & 7;6.1	"	"		Verify appropriate manuals, information etc available to passenger handling staff
21	Measures to ensure dangerous goods information is provided with / in passenger tickets	7;5.1.2a)	"	"		Confirm information provided e.g. at ticket sales point at airport
22	Procedures for dealing with and the reporting of passengers with dangerous goods that are not permitted (including liaison with security staff)	7;4.5	"	"		Verify arrangement between operator and handling agent established to ensure reporting to the State in which the dangerous goods were discovered
23	Dangerous goods notices at the cargo acceptance point	7;4.7	"	"		Check notice(s) in place
24	Dangerous goods notices at ticket sales desks, check-in desks and boarding areas (including measures to ensure they are displayed by handling agents)	7;5.1.2b)	"	"		Check notice(s) in place
25	Adequacy and use of acceptance checklists	7;1.1 & 7;1.3	"	"		Verify use and adequacy of checklist
26	Retention of acceptance check forms, dangerous goods transport documents (shipper's declarations) and NOTOCs	7;4.10	"	"		Verify documents are retained for at least 3 months
27	Handling of dangerous goods packages (including Divisions 4.1 & 5.2) in the warehouse	7;2.3 & 7;2.13	"	"		Verify packages are handled correctly
28	Preparation and building of pallets and ULDs with regard to segregation and separation of dangerous goods	7;2.2, 7;2.8, 7;2.9 & 7;2.11	"	"		Verify dangerous goods segregated in accordance with Technical Instructions
29	ULD marking and labelling	7;2.7	"	"		Verify ULD tags marked correctly (e.g. with class/ division)



<b>Ref</b>	<b>Summary of Requirement</b>	<b>Technical Instructions Reference</b>	<b>Audited</b>	<b>Non-Conformity</b>	<b>Level</b>	<b>Details Of Non-Conformity (Continued below where necessary)</b>
30	Inspections for damage or leakage immediately prior to loading and immediately after unloading	7;3.1	"	"		Verify inspections carried out
31	Procedures for removal of damaged or leaking packages from aircraft, inspection of aircraft for contamination; and decontamination	7;3.1 & 7;3.2	"	"		Verify staff awareness of applicable procedures
32	Procedures for loading and stowing a wheelchair for a passenger (including notification to the commander)	8;1.1.2 j)	"	"		Verify procedure (check-in staff)
33	Correct loading of dangerous goods (including segregation, securing and accessibility)	7;2	"	"		Verify (by observation if possible), correct loading of dangerous goods
34	Completion of NOTOCs and provision to flight crew (including signing of form)	7;4.1	"	"		Verify correct completion (including signature/ some other indication)
35	Accessibility of NOTOCs (or information on it) on ground at points of departure and scheduled arrival for duration of flight	7;4.1.6 &	"	"		Verify accessibility
36	Accessibility of dangerous goods transport document / shipper's declarations during journey	7;1.1.2	"	"		Verify accessibility

CAA Ref	Details Of Non-Conformity (Continued from above table)

**Additional Observations**

The following additional observations are made.	
	Description
1	
2	
3	
4	
5	

Signature of Inspector \_\_\_\_\_ Date \_\_\_\_\_

Signature of Responsible Person\* \_\_\_\_\_ Date \_\_\_\_\_

\* Signature by the Responsible Person indicates that the non-conformities have been explained, not necessarily that the Responsible Person or the Operator concerned agrees with the non-conformities.

**APPENDIX B**

**DANGEROUS GOODS INSPECTION REPORT —  
 PASSENGER TERMINAL NOTICES**

<b>AIRPORT:</b>	<b>TERMINAL:</b>
<b>DATE AND TIME OF INSPECTION:</b>	<b>INSPECTOR:</b>

	<b>Desk nos (if app)/ Gate nos (if app)/ Ticket sales desk</b>	<b>Handling Agent or Operator (when self operated)</b>	<b>* Operator(s) (only when identified by flight or as check-in)</b>	<b>* In use at time (T or X)</b>	<b>Notes/ Comments on prominence and sufficiency</b>
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					

(\* show operator only if “T” applicable and the handling agent is checking in passengers for that operator; otherwise leave operator blank)

	Desk nos (if app)/ Gate nos (if app)/ Ticket sales desk	Handling Agent or Operator (when self operated)	* Operator(s) (only when identified by flight or as check-in)	* In use at time (T or X)	Notes/ Comments on prominence and sufficiency
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

All notices sufficient and prominent, no further action.	Signed:	Date:
----------------------------------------------------------	---------	-------

Not all notices sufficient and prominent, further action required:

<b>Action Required</b>	
Signed:	Date:

End of new text

(\* show operator only if "T" applicable and the handling agent is checking in passengers for that operator; otherwise leave operator blank)

— END —

(\* show operator only if “T” applicable and the handling agent is checking in passengers for that operator; otherwise leave operator blank)