

**DANGEROUS GOODS PANEL (DGP)**

**NINETEENTH MEETING**

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

**Agenda Item 3: Resolution, where possible, of the non-recurrent work items identified by the Commission or the panel**

**3.3: Dangerous goods guidance material for security personnel**

**SECURITY OF DANGEROUS GOODS IN TRANSPORT  
REPORT OF THE MEETING**

(Montreal, 3 to 4 September 2003)

(Presented by the Secretary)

**1. BACKGROUND**

1.1 At DGP-WG03, it was agreed a joint working group composed of dangerous goods and aviation security experts should meet to discuss the optimal disposition of the UN security recommendations i.e. to discuss whether they should be placed in Annex 18 and the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* or in Annex 17 and the associated "Security Manual for Safeguarding Civil Aviation against Acts of Unlawful Interference" or in some combination of both. It was also agreed legal advice should be obtained (DGP/19-WP/12, paragraph 5.1.4 refers). Accordingly, a meeting to exchange views and to obtain guidance from Aviation Security (AVSEC) and the Legal Bureau (LEB) was convened in Montreal from 3 to 4 September 2003.

1.2 The meeting was attended by the following:

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	<b>State/International Organization</b>
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Y. Guarguir J. Le Tonqueze	France
J. van den Broek	Kingdom of the Netherlands
D. Elbourne J. Hart G. Leach	United Kingdom
J. McLaughlin R. Richard W. Wilkening	United States

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	<b>State/International Organization</b>
D. Brennan	IATA
D. Antonini	ICAO
H. Biernacki	
K. Rooney	
B. Verhaegen	

## 2. DISCUSSION

2.1 To facilitate discussion, two working papers were presented which reflected the differing viewpoints (see Attachment A with two appendices and Attachment B). General comments on the two approaches were given by the officers from the Aviation Security Section (AVSEC) and the Legal Bureau (LEB); these are incorporated below under the specific item.

### 2.2 *Jurisdiction of ICAO*

2.2.1 The question was raised whether the UN security requirements were beyond the scope of ICAO's mandate and thus should not be incorporated into ICAO standards or recommended practices. It was noted that one of the aims of the UN requirements was to minimize theft or mis-use of dangerous goods that may endanger persons or property in a non-aviation environment rather than specifically involving civil aviation. The LEB officer explained that ICAO's jurisdiction was rather broad when concerned with safety as it was derived mainly from Article 44 of the *Convention on International Civil Aviation*, in particular paragraphs a) and h) where it is stated the aims and objectives of the Organizations are to "insure the safe and orderly growth of international civil aviation throughout the world" and to "promote safety of flight in international air navigation". Additionally Resolution A33-1, developed at the last Assembly, directed ICAO to urgently address new and emerging threats to civil aviation. As the UN security recommendations were developed to cover all modes of transport with the aim of partially covering such threats to transport, he believed that ICAO could implement the recommendations.

### 2.3 *Objectives of UN requirements*

2.3.1 It was suggested that the objectives of the UN requirements were somewhat different to that for cargo security and perhaps could be considered to be wider in scope and in applicability to that contained in Annex 17 i.e. the UN requirements would apply to all involved in the transport chain including cargo aircraft operators and shippers of dangerous goods whilst Annex 17 addressed operators. However, it was pointed out by the AVSEC officer that Annex 17 was not restricted to operators but included a wider audience which included police, airports and regulated agents and could, perhaps, be expanded further. It was suggested that expanding the regulated agent concept to include shippers might result in the application of the dangerous goods security requirements being extended to a larger audience than that intended.

### 2.4 *Applicability to operators of cargo aircraft*

2.4.1 It was noted that although the proposed security requirements would apply to all aircraft operations, Annex 17 addressed passenger aircraft. It would therefore be necessary to expand the scope of Annex 17 to apply to operators of cargo aircraft. It was also suggested that the definition of cargo should be expanded to include cargo "intended" for loading on an aircraft. The AVSEC officer noted that the AVSECP had developed a strategic objective in 1995 for Annex 17 to address all operations which would, when

developed, include cargo. Since AVSECP/12 (November 2002), effort has been devoted to improving other areas of security where the threat has been assessed to be greater. He suggested that when the AVSECP considers this issue of expansion, it would be within the context of a threat to the aircraft itself.

2.4.2 There was discussion in relation to the quantity of dangerous goods transported on passenger versus cargo aircraft in terms of tonnage and number of shipments; it was agreed that statistics would be helpful for discussion of this issue.

2.4.3 Recognizing that an expansion to Annex 17 to cover all operations might have far reaching implications, it was suggested that the AVSECP be asked to consider restricting the expansion to include only cargo operators carrying dangerous goods.

## 2.5 *Incorporation of UN requirements*

2.5.1 The incorporation of UN recommendations into ICAO rules has normally been done by including them in dedicated ICAO material, the *Technical Instructions*, modifying it as necessary for air transport. In the specific case of the UN security recommendations, it was recognized that a high percentage of these requirements were already covered by Annex 17 and/or the *Security Manual* (as incorporated into national legislation). It was noted that should the UN requirements be included in Annex 17, a change to the definition for security would be necessary so as to include the specific UN requirements for dangerous goods security whilst such a UN definition could be specifically retained for exclusive use in the framework of Annex 18 and the *Technical Instructions*. It was suggested by the AVSEC officer that every effort should be made to avoid duplication of effort by both panels of experts.

2.5.2 With regard to security plans, it was noted that Annex 17, paragraph 3.1.1 already addressed this issue but the standard was directed to States whereas the UN security requirements required shippers, operators and others (e.g. consolidators) to have plans.

2.5.3 It was noted that some other international bodies had developed security provisions and that ideally no conflict should exist between such provisions and the UN requirements as adopted by ICAO. It was explained that the UN security requirements had been drafted with both the ICAO and IMO security standards in mind and that no conflict was intended.

## 2.6 *Annex 17 or Annex 18*

2.6.1 It was explained by the LEB officer that an ICAO standard had the same legal force, irrespective of which annex it was located. He noted that Annex 17 was specifically dedicated to security matters, incorporating core standards related to security of civil aviation whereas other annexes contained security-related provisions as shown in the attachment to Annex 17.

## 2.7 *Legal status and availability of Technical Instructions vs Security Manual*

2.7.1 The LEB officer explained that the *Security Manual* was guidance material only, requiring approval by the Secretary General and did not have any legally binding force as regards Contracting States. The *Technical Instructions* were subject to approval by the Council under Article 52, but the latter desired to grant them a more stringent effect than guidance material, by referring to them in Annex 18. Paragraph 2.2.1 of Annex 18 therefore specified that each Contracting State shall take the necessary measures to achieve compliance with the *Technical Instructions*. This was in contrast to the *Security Manual* which was dependent upon States incorporating it into National Aviation Security Programmes, distribution of which was a matter for States. With regard to availability of the two documents, it was noted that the *Instructions* were more readily

available whilst the Security Manual, being an ICAO restricted document, had some constraints placed upon its distribution. However, the AVSEC officer pointed out that the issue of the manual being restricted would be discussed at the next panel meeting and changes might be expected, resulting in a less problematic distribution.

## 2.8 *Amendment approval process and time line*

2.8.1 It was noted that the AVSECP works on a consensus basis which may make an amendment process longer than if it were an amendment developed by the DGP which traditionally has accepted a simple majority, if necessary. It was also noted that a shorter time line existed for amendments to the Technical Instructions in so far as recommendations by the panel arising from the next meeting (DGP/19, 27 October to 7 November 2003) would likely become applicable from 1 January 2005. Additionally, the biennial revision cycle for the Technical Instructions was in phase with that of the revision to the UN recommendations. This would also align with the expected date of application of the UN text by the sea and land modes. This was in contrast to AVSECP, the next meeting of which will be in May 2004. Amendments to the Security Manual have not traditionally followed a cyclical revision.

## 2.8 *Disposition of UN requirements*

2.8.1 The following options were discussed:

- 1) Incorporating the UN requirements into Annex 18 and the *Technical Instructions* with cross referencing to Annex 17 until such time as the scope of Annex 17 has been broadened sufficiently to allow transfer from Annex 18 / *Technical Instructions* to Annex 17 / *Security Manual*
- 2) Dividing the UN requirements so that the dangerous goods security requirements for operators be included in Annex 17 whilst the reminder, aimed at shippers, be included in Annex 18 and the *Technical Instructions*.
- 3) Incorporating the UN requirements into Annex 17 following the expansion to include operators of cargo aircraft and shippers

2.8.2 No preference was established by the meeting. It was agreed that discussion by the AVSECP of the various issues would be helpful to the further discussion by the panel at DGP/19.

## 3. **ACTION**

3.1 The following actions were agreed:

- a report of the meeting would be prepared as a working paper for DGP/19;
- the two working papers used as the base documents for this meeting would be revised and submitted as working papers for DGP/19;
- these revised working papers together with a series of questions would be submitted to AVSECP for distribution to the Aviation Security Panel (AVSECP) with a request for comments from those members before DGP/19 (See Attachment C for list of questions).

## ATTACHMENT A

### SECURITY

(Presented by G.A. Leach and D. Elbourne)

#### 1. BACKGROUND

1.1 Following an earlier working paper to the ICAO Dangerous Goods Panel (copy attached at Annex I), this paper details the views of the United Kingdom in respect of the most appropriate location for the new material developed by the United Nations in respect of security of dangerous goods. This paper follows a thorough comparison of the UN text with that contained in Annexes 17 and 18.

#### 2. GENERAL

2.1 Before deciding on where the UN text should be adopted by ICAO, it should first be decided if it can be adopted by ICAO. 1. The overarching objective of Annex 17 to the Chicago Convention (2.1.1) is that "Each Contracting State shall have as its primary objective the safety of passengers, crew, ground personnel and the general public in all matters relating to safeguarding against acts of unlawful interference with civil aviation." The purpose of the UN Model Regulation (the UN text) is "... To address the security of dangerous goods in transport .... security means measures or precautions to be taken to minimise theft or mis-use of dangerous goods that may endanger persons or property."

2.2 The UK has considered ICAO's position in this regard and views have been expressed that it would be appropriate for ICAO to adopt the UN Text. However, it has also been argued that the UN Text goes beyond the ICAO remit as set out in Annex 17.

2.3 The UK suggests that ICAO satisfies itself on this point before adopting the UN Text in either Annex 17 or 18.

#### 3. ADOPTION OF THE TEXT BY ICAO

3.1 If it is considered that ICAO is able to adopt the UN text it is important to appreciate that the aviation industry is many years ahead of other modes of transport in establishing international requirements for security and in securing their implementation.

3.2 It is contested that, on balance, the appropriate vehicle for the adoption of the UN text is Annex 17 rather than Annex 18, for the following reasons:

- 1) The UN text is primarily about security of dangerous goods not the properties of those goods; in practice, implementation and enforcement is likely to be alongside existing Annex 17 requirements relating to cargo security (Annex 17 Section 4.5);
- 2) In States where safety and security regulation are separate (such as the UK) ) the security regulator should own the UN text.
- 3) The air mode has, associated with Annex 17, the Security Manual for Safeguarding Civil Aviation Against Acts of Unlawful Interference. Other modes do not have such a vehicle available, so the fact they have put security provisions in their safety document is not a good reason for aviation doing so.
- 4) ICAO has security experts and these are in the AVSEC Panel. Annex 18 and the Technical Instructions are controlled by the Dangerous Goods Panel, who are not security experts. Conversely, AVSEC does not need dangerous goods expertise to adopt the UN text since, as stated previously, it is related to the security of dangerous goods, as opposed to the properties of those goods.
- 5) Other, non-UN text, security requirements are already in Annex 17 and the Security Manual. If the UN-text were adopted via the Technical Instructions the security requirements would be split and not available from a single source.

3.3 It is recognised, however, that there will be a need for close co-operation between the aviation safety and security agencies of states. If the UN text is adopted in Annex 17, the detail will have to be contained in the Security Manual which is a Restricted document and may therefore not be readily available to those in the dangerous goods industry that will have a need to know about the security requirements. However, there is no reason why those with a need to know can not have access to a Restricted document, and this can be addressed by States through translation of the Security Manual to their National Security Programme. Those consigning cargo should in any event already be part of the cargo security regime.

3.4 The United Kingdom has undertaken an analysis of Annex 17 and the UN text to establish the extent to which the principles of the UN text are not already covered by Annex 17 Standards. A summary of the UK findings is at Annex II. This analysis revealed that there are very few gaps, as Section 4.5 of Annex 17 covers most of the requirements (Section 3.4 covers training). That said, it is suggested that 4.5 needs amending as follows so as to address all types of aircraft carrying cargo, not only passenger aircraft:

"4.5.2 Each Contracting State.....for carriage on aircraft are subjected to appropriate security controls"

"4.5.3 Each Contracting State.... for carriage aircraft unless the security of....."

"4.5.4 Each Contracting State.... for carriage on aircraft are subjected to appropriate security controls ....."

3.5 It is also suggested that a new standard is required to address the requirement for a security plan for high consequence dangerous goods:

"4.5.5 Each Contracting State shall establish measures to ensure that cargo [and mail] that includes high consequence dangerous goods shall be transported on aircraft only where the operator adopts, implements and complies with a security plan to ensure that such goods are subject to appropriate security control.

3.6 It is also suggested that a small change be made to the definition of cargo contained in Chapter 1 of Annex 17 to make clear that the cargo security requirements apply to all cargo intended for carriage by air:

"Cargo. Any property intended for carriage on an aircraft other than mail, stores and accompanied or mishandled baggage"

3.7 It is also proposed that the details contained in paragraph 1.4.3.2.2 of the UN text (security plans) be included in the Security Manual following appropriate consideration by a study group established for the purpose. This study group would also need to review other detailed amendments to the Security Manual, including:

- i) Whether there is a difference between the word "cargo" as used in Annex 17 and the words "air cargo" as used in the Manual;
- ii) Amendment of paragraph 38 in Appendix 25 of the manual to include the word "received" as well as "processed" to reflect the full requirement of the UN text.
- iii) Considering the scope of the word "staff" in paragraph 41 of Appendix 25 and whether it meets the requirements of the UN text.
- iv) Considering the content of the training syllabus.
- v) Considering the wording of Appendix 25, para.11, 5th bullet of the Security Manual. It is suggested this should be re-worded as follows to recognise the fact that dangerous goods may be carried legitimately by air:

"...certifies in writing that the consignment does not contain any explosives or any other dangerous devices or substances other than those offered for carriage by air in accordance with the International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods by Air"

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## ATTACHMENT B

### DEVELOPMENT OF SECURITY STANDARDS FOR DANGEROUS GOODS TRANSPORTED BY AIR

(Presented by R. Richard)

#### 1. INTRODUCTION

1.1 As a result of the terrorist attacks on the World Trade Center and the Pentagon on September 11, 2001, and subsequent terrorist threats, the United States and many other countries have undertaken a broad review of government and industry dangerous goods transportation safety and security programs. The United Nations Committee of Experts on the Transport of Dangerous Goods and the Globally Harmonized System of Labeling and Classification of Chemicals (UN COE) adopted security measures that were included in the 13th revised edition of the UN Model Regulations as a matter of urgency to address the potential misuse of dangerous goods by terrorists. In the wrong hands, dangerous goods pose a significant security threat.

1.2 The ICAO TI provides for a high degree of safety with respect to avoiding and mitigating unintentional releases of dangerous goods in transport. However, the TI does not specifically address security issues related to minimize the potential for theft or mis-use of dangerous goods which may endanger persons and property. Following the decisions of the 33rd Session of the Assembly and Resolution A33-1, Declaration on misuse of civil aircraft as weapons of destruction and other terrorist acts involving civil aviation and the outcome of the High-level, Ministerial Conference held on 19 and 20 February 2002 at ICAO Headquarters, an aviation security plan of action was developed and presented to the Council (C 166/3 and C 166/14). Included in the plan is "enhancement of Annex 17 and strengthening of security-related provisions in other Annexes to the Convention (Annex 1 - Personnel Licensing, Annex 6 - Operation of Aircraft, Annex 8 - Airworthiness of Aircraft, Annex 9 - Facilitation, Annex 11 - Air Traffic Services, Annex 14 - Aerodromes and Annex 18 - The Safe Transport of Dangerous Goods by Air)". On the basis of the plan, the recent decisions taken by the UN COE and actions being undertaken by other modal organizations, regional bodies and national governments, the Dangerous Goods Panel would be remiss in its responsibilities if it were not to include security measures into Annex 18 and the TI.

1.3 Recently, security standards have been added to domestic US dangerous goods regulations, regional regulations within Europe and elsewhere. The domestic US Hazardous Materials Regulations (HMR) are promulgated under the authority of Section 5103(b) of the Federal Hazardous Materials Transportation Law. Section 1711 of the Homeland Security Act (P.L. 107-296) directed the US Secretary of Transportation to prescribe regulations for the safe transportation, including security, of dangerous goods in intrastate, interstate, and international commerce. As a result, the US Department of Transportation has issued regulations affecting the security of dangerous goods. These requirements mandate basic security awareness training and the establishment of security plans when certain particularly dangerous goods are being offered or accepted for transport including transport by air.

1.4 Amendment 10 of Annex 17 to the Convention on International Civil Aviation addresses Safeguarding International Civil Aviation Against Acts of Unlawful Interference. Chapter 4 of Annex 17 addresses Preventative Security Measures. Section 4.5. addresses: Measures relating to cargo, mail and other

goods. Section 4.5.2 indicates:

*Each Contracting State must establish measures to ensure that cargo, courier and express parcels and mail intended for carriage on passenger flights are subject to appropriate security controls.*

Annex 17 is directed at the security of passenger aircraft and does not impose security requirements on cargo aircraft. Any changes to Annex 17 would have to be discussed by the AVSEC panel and approved through formal channels. The DGP should make its decisions about dangerous goods on the basis of Annex 17 as it is currently written. Since, the majority of dangerous goods are transported on cargo aircraft and the majority of dangerous goods categories authorized to be transported by air are only authorized for transport on cargo aircraft, the majority of dangerous goods transported aboard aircraft are outside of the scope of the Annex-17 security standards and recommended practices. Additionally, the objectives of the dangerous goods security measures that were adopted by the UN COE are somewhat different than the general cargo security measures in Annex 17. While it is understood that the AVSEC Panel will be considering amendments to Annex 17, it is believed that amendments to Annex 18 and the TI commensurate with those adopted by the UN COE are necessary, warranted and consistent with the ICAO Assembly Resolution and security plan of action.

1.5 The security requirements adopted by the UN COE apply to shippers and carriers in all modes of transport. They are intended to minimize the potential for theft or mis-use that may endanger persons and property. Security training should be required for all shippers that offer dangerous goods for transport by aircraft and security plans should be developed by carriers that transport particularly sensitive dangerous goods. The UN indicative list of dangerous goods is not well suited for incorporation in the ICAO TI for several reasons including the fact that some of the categories and quantities of dangerous goods are not permitted for transport aboard passenger or cargo aircraft and because significantly less quantities can pose a serious security risk in air transport as compared with other modes of transport. On this basis, it is proposed to incorporate an indicative list of particularly sensitive dangerous goods that is more appropriate for air transport.

1.6 If the Panel agrees with the proposals below the secretariat should be requested to communicate the Annex 18 and TO amendments to the AVSEC Panel with recommendations for amendments to Annex 17 to recognize the dangerous goods security requirements.

## 2. PROPOSAL

2.1 The Panel is requested to consider the following:

- Appropriate security measures should take into account the fact that dangerous goods are currently classified by the inherent risk they pose while in transport. A chapter should be established in Annex 18 to the Chicago Convention and a new chapter (Chapter 1.5) should be established in the Technical Instructions for the Safe Transport of Dangerous Goods by Air to address security measures applicable to operators, shippers and others involved in the transport of dangerous goods aboard aircraft.

2.2 It is proposed that Annex 18 be amended to address security measures applicable to dangerous goods as follows:

- a) In Chapter 1 a definition for *dangerous goods* security should be added as follows:

**Dangerous goods security.** For the purposes of this Annex dangerous goods security means measures or precautions to be taken to minimise theft or mis-use of dangerous goods that may endanger persons

or property.

b) A new Chapter 13 should be included as follows:

### **Chapter 13**

#### **DANGEROUS GOODS SECURITY PROVISIONS**

Each Contracting State shall establish dangerous goods security measures applicable to shippers, operators, consignors and other individuals engaged in the transport of dangerous goods by air to be taken to minimize theft or mis-use of dangerous goods that may endanger persons or property. These measures should be commensurate with security provisions specified in other Annexes and the Technical Instructions.

2.3 The following text is proposed for incorporation in Part 1 of the TI:

#### Chapter 5

#### **DANGEROUS GOODS SECURITY**

*Note 1 — This Chapter provides requirements intended to address the security responsibilities of operators, shippers and others involved in the transport of dangerous goods aboard aircraft. It should be noted that Annex 17 provides comprehensive requirements for implementation of security measures by States to prevent unlawful interference with civil aviation, or when such interference has been committed. In addition the Security Manual for Safeguarding Civil Aviation Against Acts of Unlawful Interference (DOC 8973- Restricted) provides procedures and guidance on aspects of aviation security and is intended to assist States in the implementation of their respective national civil aviation security programs. The requirements in this Chapter are intended to supplement the requirements of Annex 17 and to implement measures applicable to shippers, operators and consignors to be taken to minimize theft or mis-use of dangerous goods that may endanger persons or property. The requirements of this Chapter do not supercede requirements of Annex 17 or the Security Manual.*

*Note 2 — State may apply additional security provisions which should be considered when offering or transporting dangerous goods.*

#### 2.4 *General security provisions*

2.4.1 All persons engaged in the transport of dangerous goods must consider security requirements for the transport of dangerous goods commensurate with their responsibilities.

2.4.2 Shippers must only offer dangerous goods to operators and operator representatives that have been appropriately identified.

2.4.3 Acceptance and storage sites, such as airside warehouses and other temporary storage areas must be properly secured and, where possible, not be accessible to the general public.

#### 2.5 *Security Training*

2.5.1 The training specified in 1;4.2 must include elements of security awareness.

2.5.2 Security awareness training must address the nature of security risks, recognising security risks,

methods to address and reduce such risks and actions to be taken in the event of a security breach. It must include awareness of security plans (if appropriate) commensurate with the responsibilities of individuals and their part in implementing security plans.

2.5.3 Such training must be provided or verified upon employment in a position involving dangerous goods transport and must be periodically supplemented with retraining.

2.5.4 Records of all security training undertaken must be kept by the employer and made available to the employee if requested.

## 2.6 *Security Plans*

2.6.1 Operators, shippers and others engaged in the transport of high consequence dangerous goods (see Table 1-5 ) must adopt, implement and comply with a security plan that addresses at least the elements specified in 5.3.2.

2.6.2 The security plan must comprise at least the following elements:

- a) specific allocation of responsibilities for security to competent and qualified persons with appropriate authority to carry out their responsibilities;
- b) records of dangerous goods or types of dangerous goods transported;
- c) review of current operations and assessment of vulnerabilities, including inter-modal transfer, temporary transit storage, handling and distribution as appropriate;
- d) clear statements of measures, including training, policies (including response to higher threat conditions, new employee/employment verification etc.), operating practices (e.g. choice/use of routes where known, access to dangerous goods in temporary storage, proximity to vulnerable infrastructure etc.), equipment and resources that are to be used to reduce security risks;
- e) effective and up to date procedures for reporting and dealing with security threats, breaches of security or security incidents;
- f) procedures for the evaluation and testing of security plans and procedures for periodic review and update of the plans;
- g) measures to ensure the security of transport information contained in the plan; and
- h) measures to ensure that the security of the distribution of transport documentation is limited as far as possible. (such measures must not preclude provision of transport documentation required by Part 5, Chapter 4 of these Instructions.).

*NOTE — Operators, shippers and consignees should co-operate with each other and with appropriate authorities to exchange threat information, apply appropriate security measures and respond to security incidents.*

Table 1-5: **INDICATIVE LIST OF HIGH CONSEQUENCE DANGEROUS GOODS**

High consequence dangerous goods are those which have the potential for mis-use in a terrorist incident and which may, as a result, produce serious consequences such as mass casualties or mass destruction. The following is an indicative list of high consequence dangerous goods:

- Class 1, Division 1.1 explosives
- Class 1, Division 1.2 explosives
- Class 1, Division 1.3 compatibility group C explosives
- Division 2.3 toxic gases (excluding aerosols)
- Class 3 and Division 4.1 desensitised explosives except for those that are authorized for transport aboard passenger aircraft and are packaged in quantities per packaging not greater than the quantity specified in Column 10 of Table 3-1;
- Division 6.1 toxic by inhalation substances of Packing Group I;
- Division 6.2 infectious substances of Category A;
- Class 7 radioactive materials in quantities greater than 3000 A1 (special form) or 3000 A2, as applicable, in Type B and Type C packages; and
- Dangerous goods that are forbidden for transport on passenger and cargo aircraft as indicated in Table 3-1 that are transported under exemption.

2.7 The following consequential amendment is also proposed:

In 1; 4.2.4 change the last sentence to read "The records of training must be made available upon request to the employee or the appropriate national authority.

— END —



### **Questions for AVSECP members**

Can Annex 17 be expanded to include shippers?  
What would be the implications of such an expansion?

Can Annex 17 be expanded to require cargo operators of cargo aircraft carrying dangerous goods to apply the specific UN security requirements?  
What would be the implications of such an expansion?

If the UN security requirements were to be incorporated into Annex 18 and/or the *Technical Instructions for the Safe Transport of Dangerous Goods by Air*, do you anticipate any problems?

Do you see a potential for overlap and conflict? If yes, please describe and make suggestions as to how this could be resolved or minimized.





## **DANGEROUS GOODS PANEL**

### **MEETING OF THE WORKING GROUP OF THE WHOLE**

(Dubai, 31 March to 4 April 2003)

#### **SECURITY**

(Presented by G A Leach)

#### **1. BACKGROUND**

1.1 DGP-WG/03-WP/39 details the text developed by the UN for inclusion in the Model Regulations (1.4) in respect of security provisions for dangerous goods. Given the unstable world in which we live, recognising the potential dangers of particular dangerous goods falling into the wrong hands must be welcomed.

1.2 The text of 1.4 is intended to be applied by all modes of transport but this does not mean the text has to be adopted in the Technical Instructions, only that it is adopted by the air mode by some means and this paper suggests that the most appropriate location for the bulk of the UN text is Annex 17 and the associated "Security Manual for Safeguarding Civil Aviation Against Acts of Unlawful Interference".

1.3 It must be recognized that the Technical Instructions and the Security Manual have been produced for different reasons; the Technical Instructions detail the provisions for the safe transport of dangerous goods by air in normal, lawful, circumstances, whilst the Security Manual, by its very name, addresses acts of "unlawful interference" which is exactly the intent of the UN text. It will also be noted in Note 2 of the UN text that "theft" is mentioned, which suggests even more that the Technical Instructions would be an inappropriate location for these requirements.

1.4 3.1.3 of Annex 17 states "Each Contracting State shall designate an appropriate authority within its administration to be responsible for the development, implementation and maintenance of the national civil aviation programme". In many (if not most) states, the agency responsible for air safety i.e. a Civil Aviation Authority is different to that responsible for security. Air safety and security are also likely to be subject to different legislation and to include security provisions in the Technical Instructions has the potential to cause confusion. It would also, with the greatest respect to Panel members, face the Dangerous Goods Panel with matters outside their sphere of expertise, a particularly unnecessary burden considering ICAO has a dedicated Panel of experts and comprehensive regulatory material dealing with nothing but the subject of security.

1.5 Furthermore, the proposed UN text is, generally, less restrictive than the existing text in the Security Manual. Consequently, a shipper, agent or operator may be mis-led into believing that by complying with this text they would be in compliance with the international requirements, but this would not be so, the requirements of the Security Manual would still have to be complied with.

1.6 The Security Manual already has provisions for cargo security (Part 4.6 and appendix 25), which according to the definition of "cargo" ("any property carried on an aircraft other than mail, stores and accompanied or mishandled baggage") would include dangerous goods and it is suggested an expansion of these provisions would satisfy the needs of the UN. Appended to this paper is a cross check of the new UN material against what already exists in the Security Manual.

Notwithstanding the above, it is understood that the ANC require all ICAO Annex's to include some reference to security. Consequently, it is suggested that it would be appropriate to add a cross reference to Annex 17 and the Security Manual in both Annex 18 and the Technical Instructions.

## 2. PROPOSALS

2.1 The following are proposals which, if adopted, would ensure that the UN security provisions for dangerous goods in air transport were adopted into the air mode in the most appropriate location. However, before any can be decided upon, it is suggested that a working group consisting of members of the AVSEC Panel and interested members of the DGP is held in advance of the DGP meeting in 2003.

## 3. PROPOSAL 1

3.1 Add a new note 5 to Chapter 2.1 in Annex 18:

*"Note 5.- The detailed provisions for the security of cargo, including dangerous goods, are contained in Annex 17 and the associated Security Manual for Safeguarding Civil Aviation Against Acts of Unlawful Interference".*

## 4. PROPOSAL 2

4.1 Add a new Part 1; 1.6 to the Technical Instructions:

### 4.2 "1.6 Security

4.3 The detailed provisions for the security of cargo, including dangerous goods, are contained in Annex 17 and the associated Security Manual for Safeguarding Civil Aviation Against Acts of Unlawful Interference".

## 5. PROPOSAL 3

5.1 In association with AVSEC, review/ expand the material in the Security Manual in line with the table appended to this paper.

Chapter 1.4 of UN	ICAO Security Manual	Comments/ proposals
<p><b>NOTE 1:</b> <i>This Chapter provides requirements intended to address the security of dangerous goods in transport in all modes. Mode specific security provisions can be found in Chapter 7.2. National and modal authorities may apply additional security provisions which should be considered when offering or transporting dangerous goods.</i></p>	No equivalent	Not applicable
<p><b>NOTE 2:</b> <i>For the purposes of this Chapter security means measures or precautions to be taken to minimise theft or mis-use of dangerous goods that may endanger persons or property.</i></p>	Chapter 1 DEFINITIONS: <b>Security.</b> A combination of measures and human and material resources intended to safeguard civil aviation against acts of unlawful interference.	<b>If added to the Technical Instructions:</b> The text would conflict with that contained in the ICAO Security Manual. UK CAA legal opinion is that theft and mis-use are of no relevance to the safety of the aircraft and would not be expected to be specified in the Technical Instructions.
<p><b>1.4.1 General provisions</b></p> <p>1.4.1.1 All persons engaged in the transport of dangerous goods shall consider security requirements for the transport of dangerous goods commensurate with their responsibilities.</p>	Appendix 25: 10. – 20. contain detailed responsibilities for “known consignor”, “regulated agent” (the wording of which would encompass handling agent) and “aircraft operator”. Further information contained in Appendix 1 under VII;H “Air cargo”	No action required – ICAO Security Manual addresses this issue in much greater depth  <b>If added to the Technical Instructions:</b> Industry would be presented with a less restrictive requirement than that contained in the ICAO Security Manual
<p>1.4.1.2 Consignors shall only offer dangerous goods to carriers that have been appropriately identified.</p>	No equivalent	It is understood this means a consignor must verify that the carrier (operator) is a legitimate company. Whilst this might be appropriate for dangerous goods offered for carriage by road, it is queried whether it is appropriate for air transport.  <b>If added to the Technical Instructions:</b> What would be expected of a consignor?
<p>1.4.1.3 Transit sites, such as airside warehouses, marshalling yards and other</p>	Appendix 25: 27 – 31 contain more detailed provisions under the headings of “Secure premises”, “Stand-alone security” and	ICAO Security Manual addresses this issue in much greater depth, although does not make mention of areas being “well lit”.

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<p>temporary storage areas shall be properly secured, well lit and, where possible, not be accessible to the general public.</p>	<p>"Access control".</p>	<p><b>Proposal</b></p> <p>It is proposed to suggest to ICAO AVSEC that they extend Appendix 25 to require the areas identified to be "well lit".</p> <p><b>If added to the Technical Instructions:</b> With the exception of lighting, industry would be presented with a less restrictive requirement than that contained in the ICAO Security Manual.</p>
<p><b>1.4.2 Security Training</b></p> <p>1.4.2.1 The training specified for individuals in 1.3.2 (a), (b) or (c) shall also include elements of security awareness.</p> <p>1.4.2.2 Security awareness training shall address the nature of security risks, recognising security risks, methods to address and reduce such risks and actions to be taken in the event of a security breach. It shall include awareness of security plans (if appropriate) commensurate with the responsibilities of individuals and their part in implementing security plans.</p> <p>1.4.2.3 Such training shall be provided or verified upon employment in a position involving dangerous goods transport and shall be periodically supplemented with retraining.</p> <p>1.4.2.4 Records of all security training undertaken shall be kept by the employer and made available to the employee if requested.</p>	<p>Appendices 6 and 7 contain detailed provisions for the training of security personnel. Mention is also made under 32., 38., 39. and 41 in Appendix 25.</p>	<p>Both VII; H and 41. of Appendix 25 only make reference to staff engaged in the preparation and delivery of air cargo intended to be carried on a passenger carrying aircraft</p> <p><b>Proposal</b></p> <p>It is proposed to suggest to ICAO AVSEC that they extend these requirements to include cargo carried on all cargo aircraft.</p> <p><b>If added to the Technical Instructions:</b> Security training of staff of the operators would become subject to the approval of the State of the operator if added to the "Training" section of the Technical Instructions; it would be recommended that states approve training of other categories of staff.</p>

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<p><b>1.4.3 Provisions for high consequence dangerous goods</b></p> <p>1.4.3.1 In implementing national security provisions competent authorities shall consider establishing a programme for identifying consignors or carriers engaged in the transport of high consequence dangerous goods for the purpose of communicating security related information. An indicative list of high consequence dangerous goods is provided in Table 1.4.1.</p> <p><b>Table 1.4.1: INDICATIVE LIST OF HIGH CONSEQUENCE DANGEROUS GOODS</b></p> <p>High consequence dangerous goods are those which have the potential for mis-use in a terrorist incident and which may, as a result, produce serious consequences such as mass casualties or mass destruction. The following is an indicative list of high consequence dangerous goods:</p> <p>Class 1, Division 1.1 explosives</p> <p>Class 1, Division 1.2 explosives</p> <p>Class 1, Division 1.3 compatibility group C explosives</p> <p>Class 1, Division 1.5 explosives</p> <p>Division 2.1 flammable gases in bulk</p> <p>Division 2.3 toxic gases (excluding aerosols)</p> <p>Class 3 flammable liquids in bulk of packing groups I and II</p>	<p>No equivalent.</p>	<p><b>Proposal</b></p> <p>The text applies to any quantity of the types of dangerous goods specified. However, some high consequence dangerous goods are allowed in excepted quantities i.e. class 3/ division 4.1 desensitized explosives in PGII (16 substances) and 6.1 in PGI (dermal and oral toxicity only) which would exclude them from any new provisions. Similarly Division 6.2 substances of category A are permitted in air mail and so the operator would not know they were carrying them and consequently could not comply with the new provisions;</p> <p>It is proposed to suggest to ICAO AVSEC that suitable text be developed for inclusion in Part 4.6 “Security Measures for Air Cargo” and/ or Appendix 25, for example:</p> <p>“States shall consider establishing a programme for identifying consignors or carriers engaged in the transport of high consequence dangerous goods for the purpose of communicating security related information. High consequence dangerous goods are those which have the potential for mis-use in a terrorist incident and which may, as a result, produce serious consequences such as mass casualties or mass destruction. The following is a list of dangerous goods which should be regarded as being of high consequence:</p> <p>Class 1, Division 1.1 explosives</p> <p>Class 1, Division 1.2 explosives</p> <p>Class 1, Division 1.3 compatibility group C</p>

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<p>groups I and II</p> <p>Class 3 and Division 4.1 desensitised explosives</p> <p>Division 4.2 goods of packing group I in bulk</p> <p>Division 4.3 goods of packing group I in bulk</p> <p>Division 5.1 oxidizing liquids in bulk of packing group I</p> <p>Division 5.1 perchlorates, ammonium nitrate and ammonium nitrate fertilisers, in bulk</p> <p>Division 6.1 toxic substances of Packing Group I</p> <p>Division 6.2 infectious substances of Category A</p> <p>Class 7 radioactive material in quantities greater than 3000 A1 (special form) or 3000 A2, as applicable, in Type B and Type C packages.</p> <p>Class 8 corrosive substances of packing group I in bulk</p> <p><b>NOTE 1:</b> For the purposes of this table 'in bulk' means transported in quantities greater than 3000 kg or 3000 l in portable tanks or bulk containers.</p> <p><b>NOTE 2:</b> <i><b>For purposes of non-proliferation of nuclear material the Convention on Physical Protection of Nuclear Material applies to international transport supported by IAEA INFCIRC/225(Rev.4).</b></i></p>		<p>explosives</p> <p>Class 1, Division 1.5 explosives</p> <p>Division 2.3 toxic gases (excluding aerosols)</p> <p>Class 3 and Division 4.1 desensitised explosives</p> <p>Division 6.1 toxic substances of Packing Group I</p> <p>Division 6.2 infectious substances of [Category A]</p> <p>Class 7 radioactive material in quantities greater than 3000 A1 (special form) or 3000 A2, as applicable, in Type B and Type C packages.</p> <p><i>NOTE 1: For purposes of non-proliferation of nuclear material the Convention on Physical Protection of Nuclear Material applies to international transport supported by IAEA INFCIRC/225(Rev.4)."</i></p> <p><i>NOTE 2: <u>The Civil Aviation Security Policy and Regulatory Section should, if necessary, liaise with the Civil Aviation Authority to obtain the above information.</u></i></p> <p><b>Editorial note:</b> all dangerous goods "in bulk" have been deleted since this is inappropriate for air transport. It should also be noted that the only dangerous goods which could be carried in normal circumstances i.e. without exemption are:</p> <p>1. Division 1.3C (UN2075 and UN0186);</p>

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		<p>2. Division 2.3 (UN1005, UN1016, UN1023, UN1040, UN1048, UN1064, UN1071, UN1079, UN1859, UN2191, UN2204, UN2418, UN2420, UN3168, UN3169, UN3300, UN3318);</p> <p>3. Class 3 and Division 4.1 desensitised explosives (UN1204, UN1310, UN1320, UN1321, UN1322, UN1336, UN1336, UN1337, UN1344, UN1348, UN1354, UN1355, UN1356, UN1357, UN1517, UN1571, UN2555, UN2556, UN2852, UN2907, UN3317, UN3364, UN3364, UN3365, UN3365, UN3366, UN3366, UN3367, UN3368, UN3369, UN3370.)</p> <p>4. Division 6.1 packing group I (all);</p> <p>5. Division 6.2 infectious substances of category A (all);</p> <p>6. Class 7 radioactive material greater than 3000 A1 or 3000 A2, as applicable, in Type B and Type C packages (all)</p>
<p><b>1.4.3.2 Security plans</b></p> <p>1.4.3.2.1 Carriers, consignors and others (including infrastructure managers) engaged in the transport of high consequence dangerous goods (see 1.4.1 ) shall adopt, implement and comply with a security plan that addresses at least the elements specified in 1.4.3.2.2.</p> <p>1.4.3.2.2 The security plan shall comprise at least the following elements:</p> <p>(a) specific allocation of responsibilities for security to competent and</p>	<p>No equivalent, although Appendix 5 “A Risk Assessment Model” addresses suggested security measures for baseline, intermediate and high threat conditions for Air cargo, courier and express parcels.</p>	<p><b><u>Proposal</u></b></p> <p>It is suggested that suitable text be developed in conjunction with ICAO AVSEC for inclusion in Part 4.6 and/ or Appendix 5 and/ or Appendix 25.</p> <p>Note – it is suggested that “infrastructure manager” is not relevant to air transport and could be deleted</p>

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<p>qualified persons with appropriate authority to carry out their responsibilities;</p> <p>(b) records of dangerous goods or types of dangerous goods transported;</p> <p>(c) review of current operations and assessment of vulnerabilities, including inter-modal transfer, temporary transit storage, handling and distribution as appropriate;</p> <p>(d) clear statements of measures, including training, policies (including response to higher threat conditions, new employee/employment verification etc.), operating practices (e.g. choice/use of routes where known, access to dangerous goods in temporary storage, proximity to vulnerable infrastructure etc.), equipment and resources that are to be used to reduce security risks;</p> <p>(e) effective and up to date procedures for reporting and dealing with security threats, breaches of security or security incidents;</p> <p>(f) procedures for the evaluation and testing of security plans and procedures for periodic review and update of the plans;</p> <p>(g) measures to ensure the security of transport information contained in</p>		



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<p>the plan; and</p> <p>(h) measures to ensure that the security of the distribution of transport documentation is limited as far as possible. (such measures shall not preclude provision of transport documentation required by Chapter 5.4 of these Regulations.).</p> <p><b>NOTE:</b> <i>Carriers, consignors and consignees should co-operate with each other and with appropriate authorities to exchange threat information, apply appropriate security measures and respond to security incidents</i></p>		

### General Issues

- ICAO AVSEC may amend/ introduce security requirements. There will inevitably be a delay in reflecting these in the Technical Instructions; this delay would not occur if all security requirements were consolidated in the ICAO Security Manual.
- Given that material related to security is regarded as “restricted” by the ICAO Security Manual, could such material be placed in a public document such as the Technical Instructions?



UN Model Regulation Text	Current ICAO Security Reference	Comments	Proposal
<p><b>NOTE 1:</b> This Chapter provides requirements intended to address the security of dangerous goods in transport in all modes. Mode specific security provisions can be found in Chapter 7.2. National and modal authorities may apply additional security provisions, which should be considered when offering or transporting dangerous goods.</p>	No equivalent	A similarly worded text exists in Part I, paragraph 1.2 of the Technical Instructions for Annex 18 - The Safe Transport of Dangerous Goods by Air. To ensure security continuity across all modes, text of this type should be adopted into Annex 17.	<p>Adopt into Appendix 24 of the Security Manual, the following text, as used in Part 1;1.2 of the Technical Instructions</p> <p>" When air cargo intended for air transport is carried by surface transport to or from an aerodrome, any other applicable national or modal transport security requirements should be met in addition to those that are applicable for the air cargo when carried by air"</p>
<p><b>NOTE 2:</b> For the purposes of this Chapter security means measures or precautions to be taken to minimise theft or mis-use of dangerous goods that may endanger persons or property.</p>	Annex 17, Chapter 1, Definitions, Security: "A combination of measures and human and material resources intended to safeguard civil aviation against acts of unlawful interference"	Whilst the UK would like to accept this note, it is our opinion that the UN text would conflict with the definition of security in Annex 17, which solely deals with the safety of civil aviation. The UN text is concerned with the possibility that goods might be stolen in transit and used elsewhere.	Clarification from ICAO is required. If it agreed there is a conflict, do not adopt this note, otherwise, consideration would need to be given as to how this could be incorporated. Eg perhaps by expanding the ICAO definition to say " A combination of measures and human and material resources intended to safeguard civil aviation against acts of unlawful interference and in the case of dangerous goods measures or precautions to be taken to minimise theft or mis-use of those goods that may endanger persons or property.
<p><b>1.4.1 General provisions</b></p> <p>1.4.1.1 All persons engaged in the transport of dangerous goods shall consider security requirements for the transport of dangerous goods commensurate with their responsibilities.</p>	Security Manual Appendix 25, paragraphs 32 to 37, and paragraphs 10 to 12.	Security Manual adequately covers UN Text	Do not adopt this clause.
<p>1.4.1.2 Consignors shall only offer dangerous goods to carriers that have been appropriately identified.</p>	Security Manual Appendix 25, Paragraphs 10 to 12.	Security Manual adequately covers UN Text	Do not adopt this clause.
<p>1.4.1.3 Transit sites, such as airside warehouses marshalling yards and other temporary storage areas shall be properly</p>	Security Manual Appendix 25, paragraphs 27 to 31.	The Security Manual adequately covers the UN Text, however it does not make mention of areas	Do not adopt this clause, but suggest the ICAO AVSEC Panel consider the addition to Appendix 25 of the words "well lit"

UN Model Regulation Text	Current ICAO Security Reference	Comments	Proposal
secured, well lit and, where possible, not be accessible to the general public.		being "well lit".	
<p><b>1.4.2 Security Training</b></p> <p>1.4.2.1 The training specified for individuals in 1.3.2 (a), (b) or (c) shall also include elements of security awareness.</p> <p>1.4.2.2 Security awareness training shall address the nature of security risks, recognising security risks, methods to address and reduce such risks and actions to be taken in the event of a security breach. It shall include awareness of security plans (if appropriate) commensurate with the responsibilities of individuals and their part in implementing security plans.</p> <p>1.4.2.3 Such training shall be provided or verified upon employment in a position involving dangerous goods transport and shall be periodically supplemented with retraining.</p> <p>1.4.2.4 Records of all security training undertaken shall be kept by the employer and made available to the employee if requested.</p>	Security Manual Appendices 6 and 7 and Security Manual Appendix 25, paragraphs 32, 38., 39. and 41.	Security Manual adequately covers UN Text	Do not adopt these clauses.

UN Model Regulation Text	Current ICAO Security Reference	Comments	Proposal
<p><b>1.4.3 Provisions for high consequence dangerous goods</b></p> <p>1.4.3.1 In implementing national security provisions competent authorities shall consider establishing a programme for identifying consignors or carriers engaged in the transport of high consequence dangerous goods for the purpose of communicating security related information. An indicative list of high consequence dangerous goods is provided in Table 1.4.1.</p> <p><b>Table 1.4.1: INDICATIVE LIST OF HIGH CONSEQUENCE DANGEROUS GOODS</b></p> <p>High consequence dangerous goods are those which have the potential for mis-use in a terrorist incident and which may, as a result, produce serious consequences such as mass casualties or mass destruction. The following is an indicative list of high consequence dangerous goods:</p> <p>Class 1, Division 1.1 explosives</p> <p>Class 1, Division 1.2 explosives</p> <p>Class 1, Division 1.3 compatibility group C explosives</p> <p>Class 1, Division 1.5 explosives</p> <p>Division 2.1 flammable gases in bulk</p> <p>Division 2.3 toxic gases (excluding aerosols)</p> <p>Class 3 flammable liquids in bulk of packing groups I and II</p> <p>Class 3 and Division 4.1 desensitised explosives</p> <p>Division 4.2 goods of packing group I in bulk</p> <p>Division 4.3 goods of packing group I in bulk</p>	<p>No equivalent.</p>	<p>The text applies to any quantity of the types of dangerous goods specified. However, some high consequence dangerous goods are allowed in excepted quantities i.e. class 3/ division 4.1 desensitised explosives in PGII (16 substances) and 6.1 in PGI (dermal and oral toxicity only) which would exclude them from any new provisions. Similarly Division 6.2 substances of category A are permitted in air mail and so the operator would not know they were carrying them and consequently could not comply with the new provisions.</p>	<p>Adopt the following amendment of the UN Text into Part 4.6, Appendix 24, or Appendix 25 of the Security Manual.</p> <p>“States shall consider establishing a programme for identifying shippers or operators engaged in the transport of high consequence dangerous goods for the purpose of communicating security related information. High consequence dangerous goods are those which have the potential for mis-use in a terrorist incident and which may, as a result, produce serious consequences such as mass casualties or mass destruction. The following is a list of dangerous goods which should be regarded as being of high consequence [but does not include those shipped under the Excepted Quantity provisions]:</p> <p>Class 1, Division 1.1 explosives</p> <p>Class 1, Division 1.2 explosives</p> <p>Class 1, Division 1.3 compatibility group C explosives</p> <p>Class 1, Division 1.5 explosives</p> <p>Division 2.3 toxic gases (excluding aerosols)</p> <p>Class 3 and Division 4.1 desensitised explosives</p> <p>Division 6.1 toxic substances of Packing Group I</p> <p>Division 6.2 infectious substances of [Category A]</p> <p>Class 7 radioactive material in activities greater than 3000 A1 (special form) or 3000 A2, as applicable, in Type B and Type C packages.</p>

UN Model Regulation Text	Current ICAO Security Reference	Comments	Proposal
<p>Division 5.1 oxidizing liquids in bulk of packing group I</p> <p>Division 5.1 perchlorates, ammonium nitrate and ammonium nitrate fertilisers, in bulk</p> <p>Division 6.1 toxic substances of Packing Group I</p> <p>Division 6.2 infectious substances of Category A</p> <p>Class 7 radioactive material in quantities greater than 3000 A1 (special form) or 3000 A2, as applicable, in Type B and Type C packages.</p> <p>Class 8 corrosive substances of packing group I in bulk</p> <p><b>NOTE 1:</b> For the purposes of this table 'in bulk' means transported in quantities greater than 3000 kg or 3000 l in portable tanks or bulk containers.</p> <p><b>NOTE 2:</b> For purposes of non-proliferation of nuclear material the Convention on Physical Protection of Nuclear Material applies to international transport supported by IAEA INFCIRC/225(Rev.4)."</p>			<p><b>NOTE 1 [Was note 2 of the UN Text] :</b> For purposes of non-proliferation of nuclear material the Convention on Physical Protection of Nuclear Material applies to international transport supported by IAEA INFCIRC/225(Rev.4)."</p> <p><b>NOTE 2 [New note] :</b> The Civil Aviation Security Policy should liaise with the Regulatory Section to establish a programme for identifying shippers or operators engaged in the transport of dangerous goods, for the purpose of communicating security related information.</p> <p><b>Editorial note:</b> all dangerous goods "in bulk" have been deleted since this is inappropriate for air transport. It should also be noted that the only dangerous goods which could be carried in normal circumstances i.e. without exemption are:</p> <ol style="list-style-type: none"> <li>1. Division 1.3C (UN2075 and UN0186);</li> <li>2. Division 2.3 (UN1005, UN1016, UN1023, UN1040, UN1048, UN1064, UN1071, UN1079, UN1859, UN2191, UN2204, UN2418, UN2420, UN3168, UN3169, UN3300, UN3318);</li> <li>3. Class 3 and Division 4.1 desensitised explosives (UN1204, UN1310, UN1320, UN1321, UN1322, UN1336, UN1336, UN1337, UN1344, UN1348,</li> </ol>

UN Model Regulation Text	Current ICAO Security Reference	Comments	Proposal
			<p>UN1354, UN1355, UN1356, UN1357, UN1517, UN1571, UN2555, UN2556, UN2852, UN2907, UN3317, UN3364, UN3364, UN3365, UN3365, UN3366, UN3366, UN3367, UN3368, UN3369, UN3370.)</p> <p>4. Division 6.1 packing group I (all);</p> <p>5. Division 6.2 infectious substances of category A (all);</p> <p>6. Class 7 radioactive material greater than 3000 A1 or 3000 A2, as applicable, in Type B and Type C packages (all)</p>
<p><b>1.4.3.2 Security plans</b></p> <p>1.4.3.2.1 Carriers, consignors and others (including infrastructure managers) engaged in the transport of high consequence dangerous goods (see 1.4.1 ) shall adopt, implement and comply with a security plan that addresses at least the elements specified in 1.4.3.2.2.</p> <p>1.4.3.2.2 The security plan shall comprise at least the following elements:</p> <p>(a) specific allocation of responsibilities for security to competent and qualified persons with appropriate authority to carry out their responsibilities;</p> <p>(b) records of dangerous goods or types of dangerous goods transported;</p> <p>(c) review of current operations and</p>	<p>No equivalent, although Appendix 5 “A Risk Assessment Model” addresses suggested security measures for baseline, intermediate and high threat conditions for Air cargo, courier and express parcels.</p>		<p>Adopt those requirements of 1.4.3.2 which are not addressed by Appendix 5 “A Risk Assessment Modeland which are relevant to air transport.</p> <p>It is suggested that “infrastructure manager” is not relevant to air transport and could be deleted</p>

UN Model Regulation Text	Current ICAO Security Reference	Comments	Proposal
<p>assessment of vulnerabilities, including inter-modal transfer, temporary transit storage, handling and distribution as appropriate;</p> <p>(d) clear statements of measures, including training, policies (including response to higher threat conditions, new employee/employment verification etc.), operating practices (e.g. choice/use of routes where known, access to dangerous goods in temporary storage, proximity to vulnerable infrastructure etc.), equipment and resources that are to be used to reduce security risks;</p> <p>(e) effective and up to date procedures for reporting and dealing with security threats, breaches of security or security incidents;</p> <p>(f) procedures for the evaluation and testing of security plans and procedures for periodic review and update of the plans;</p> <p>(g) measures to ensure the security of transport information contained in the plan; and</p> <p>(h) measures to ensure that the security of the distribution of transport documentation is limited as far as possible. (such measures shall not preclude provision of transport documentation required by Chapter 5.4 of these Regulations.).</p> <p><b>NOTE:</b> Carriers, consignors and consignees</p>			



<b>UN Model Regulation Text</b>	<b>Current ICAO Security Reference</b>	<b>Comments</b>	<b>Proposal</b>
should co-operate with each other and with appropriate authorities to exchange threat information, apply appropriate security measures and respond to security incidents			