



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)  
WORKING GROUP MEETING (DGP-WG/18)**

**Montréal, 1 to 5 October 2018**

**Agenda Item 6: Dangerous goods training for entities handling general cargo**

**RESPONSIBILITIES OF FREIGHT FORWARDERS**

(Presented by E. Gillett)

**SUMMARY**

This working paper proposes to establish a working group to establish the responsibilities of the freight forwarder associated with arranging the transport of cargo by air, including:

- a) identifying and rejecting undeclared/misdeclared dangerous goods from air transport; and
- b) where applicable, ensuring compliance with the requirements for dangerous goods which are to be offered to the air operator, for example when completing the master air waybill.

**Action by the DGP-WG:** The DGP-WG is invited to consider the establishment of a working group to develop text for Annex 18 and the Technical Instructions assigning responsibilities to freight forwarders.

**1. INTRODUCTION**

1.1 Freight forwarders perform a critical function in the transport of dangerous goods and general cargo by air by enabling individuals or corporations to get goods from the manufacturer or producer to a market, customer or final point of distribution. Responsible freight forwarders are well placed to advise their customers on the requirements for the safe transport of dangerous goods by air.

1.2 The freight forwarder typically issues to each shipper its own air waybill, known as a house air waybill or freight forwarder's waybill. Freight forwarders often consolidate the consignments of several independent shippers where those shipments are intended for the same airport of destination and

dispatch them under one air waybill together with a cargo manifest. There can be many freight forwarders involved in the supply chain whereby cargo is repeatedly consolidated into larger and larger shipments before being offered to the air operator for carriage under one air waybill issued by the air operator, known as the master air waybill.

1.3 The proposed amendment to Annex 6, Volume I on cargo compartment safety announced via State Letter reference AN 11/1.1.33-18/80, includes new provisions related to operations that involve the transport of items in aeroplane cargo compartments and if adopted will require operators to conduct a safety risk assessment on the transport of all items. Amongst other things, safety of the supply chain must be considered including the potential for undeclared or misdeclared dangerous goods to be offered for transport by air. The air operator may not have visibility of all the freight forwarders in the supply chain, indeed, they might only be aware of the ultimate forwarder. So, an air operator is typically unable to assess the ability of freight forwarders earlier in the transport chain to identify and intercept undeclared or misdeclared dangerous goods. It is therefore critical that all freight forwarders have adequate processes aimed at identifying and rejecting undeclared dangerous goods at the earliest opportunity in the supply chain.

1.4 At present the only requirement within the Technical Instructions placed directly on a freight forwarder is to provide dangerous goods training to its personnel. A draft new Part X to the Technical Instructions entitled “Freight Forwarder’s Responsibilities” is provided in the appendix to this working paper to aid further discussion on the responsibilities which should be assigned to such entities.

## **2. ACTION BY THE DGP-WG**

2.1 The DGP-WG is invited to establish a working group to establish the responsibilities of the freight forwarder associated with arranging the transport of cargo by air, including:

- a) identifying and rejecting undeclared/misdeclared dangerous goods from air transport;  
and
- b) where applicable, ensuring compliance with the requirements for dangerous goods which are to be offered to the air operator, for example when completing the master air waybill.

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**APPENDIX**

**PROPOSED AMENDMENT TO THE TECHNICAL INSTRUCTIONS**

**Part X**

**FREIGHT FORWARDER'S RESPONSIBILITIES**

**INTRODUCTORY NOTES**

Note 1.— This part details the responsibilities of freight forwarders arranging the transport of cargo by air including both dangerous goods and non-dangerous goods. However, nothing contained herein should be interpreted as requiring a freight forwarder to arrange the transport of a particular article or substance or as preventing a freight forwarder from imposing special requirements on the transport of a particular article or substance.

Note 2.— Where a shipper does not have trained staff, a freight forwarder may be employed to act on the shipper's behalf and to undertake the shipper's responsibilities in the preparation of the consignment. However, such persons must be trained as required by Part 1, Chapter 4.

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## Chapter 1

### GENERAL

#### 1.1 RECOGNITION OF UNDECLARED/MISDECLARED DANGEROUS GOODS

Freight forwarding staff should seek confirmation from shippers about the contents of any item of cargo where there are suspicions that it may contain dangerous goods, with the aim of preventing undeclared dangerous goods from being forwarded for transport by air as general cargo. Many innocuous-looking items may contain dangerous goods, and a list of general descriptions which, experience has shown, are often applied to such items is shown in Chapter 6.

Note 1.— Diamond-shaped GHS pictograms on packages may indicate the presence of dangerous goods. While some pictograms identify substances that only pose a hazard for supply and use, other GHS pictograms contain symbols that are largely equivalent to the symbols contained in the hazard labels used in transport, and which may therefore be classified as dangerous goods. For more information, see [www. http://www.unece.org/trans/danger/publi/ghs/ghs\\_welcome\\_e.html](http://www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html).

Note 2.— Often general names are used in the description of the content of a cargo shipment. To assist in the detection of undeclared dangerous goods, freight forwarding staff should check shipping documents with the general description stated on the air waybill and, if necessary, request documentary evidence from shippers that the shipment does not contain dangerous goods.

#### 1.2 FORWARDING DANGEROUS GOODS — DOCUMENTATION

1.2.1 A freight forwarder must not forward for transport aboard an aircraft a package or overpack containing dangerous goods or a freight container containing radioactive material or a unit load device containing the dangerous goods as described in 7.1.4.1 b) and c) unless:

- a) it is accompanied by two copies of the dangerous goods transport document; or
- b) the information applicable to the consignment is provided in electronic form; or
- c) it is accompanied, where permitted, by alternative documentation.

1.2.2 The information may be provided on a paper document or, where an agreement exists with the operator, by EDP or EDI techniques.

1.2.3 When an air waybill is issued for a consignment for which a dangerous goods transport document is required, the air waybill must contain a statement to indicate that the dangerous goods are described on an accompanying dangerous goods transport document. An air waybill issued for a consignment must, when applicable, indicate that the consignment must be loaded on cargo aircraft only.

#### 1.3 RETENTION OF DANGEROUS GOODS TRANSPORT INFORMATION

1.3.1 The forwarder must retain a copy of the dangerous goods transport document and additional information and documentation as specified in these Instructions, for a minimum period of three months.

1.3.2 When the documents are kept electronically or in a computer system, the shipper must be able to reproduce them in a printed form.

1.3.3 Where the dangerous goods transport information is provided by EDP or EDI techniques the data must be able to be produced as a paper document without delay, with the data in the sequence required by this chapter.

#### 1.4 HANDLING AND STORAGE OF DANGEROUS GOODS

1.4.1 The freight forwarder must protect packages of dangerous goods from being damaged. Particular attention must be paid to the handling of packages during their preparation for transport so that accidental damage is not caused through dragging or mishandling of the packages.

1.4.2 During the course of air transport, a package of dangerous goods bearing the package orientation label prescribed in 5.3 must be handled and stored at all times in accordance with such a label. Single packagings with end closures containing liquid dangerous goods must be handled and stored with those closures upwards, notwithstanding that such single packages may also have side closures.

1.4.3 During the course of transport, packages or unit load devices containing self-reactive substances of Division 4.1 or organic peroxides of Division 5.2 must be shaded from direct sunlight, stored away from all sources of heat in a well-ventilated area.

1.4.4 During the handling and storage of intermediate bulk containers (IBCs), account must be taken of the IBC markings specified in 6:2.4.3, if present.

### **1.5 INFORMATION TO EMPLOYEES**

1.5.1 A freight forwarder must provide such information to employees as will enable them to carry out their responsibilities with regard to the transport of dangerous goods by air.

1.5.2 With the aim of preventing undeclared dangerous goods from being loaded on an aircraft, information about:

- a) general descriptions that are often used for items in cargo or in passengers' baggage which may contain dangerous goods;
- b) other indications that dangerous goods may be present (e.g. labels, markings); and
- c) those dangerous goods which may be carried by passengers in accordance with Table 8-1;

must be provided to freight forwarding and sales staff and must be readily available to such staff.

### **1.6 TRAINING**

1.6.1 Freight forwarding staff must be adequately trained to assist them in identifying and detecting dangerous goods presented as general cargo.

1.6.2 Before a consignment of dangerous goods is forwarded for air transport, all relevant persons involved in its preparation must have received training to enable them to carry out their responsibilities, as detailed in Part 1.

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