



DANGEROUS GOODS PANEL (DGP) WORKING GROUP MEETING (DGP-WG/20)

Virtual Meeting, 19 to 23 October 2020

CONSIDERATIONS ON ACCEPTANCE OF LITHIUM BATTERIES BY DESIGNATED POSTAL OPERATORS

(Presented by D. Brennan)

SUMMARY

This information paper raises some questions with respect to processes being employed by some designated postal operators (DPO) to move e-commerce packages, some of which include lithium batteries contained in equipment, in air transport where the DPO does not hold an approval to accept lithium batteries as set out in Part 1;2.3.4.

1.1 The 2013-2014 Edition of the Technical Instructions included changes to Part 1;2.3 — Transport of Dangerous Goods by Post to permit designated postal operators (DPO) to accept lithium batteries contained in equipment, subject to the DPO being approved by their civil aviation authority.

1.2 The 2013-2014 Edition also included changes to Part 1;4 — Training to identify the training requirements for employees of DPOs responsible for the acceptance of postal articles containing lithium batteries, acceptance of mail in general and those responsible for loading and handling mail.

1.3 These changes were agreed following extensive discussions with the UPU following their request to permit DPOs to accept mail articles with lithium batteries contained in equipment. The initial request by the UPU was made at DGP-WG/11 where the UPU advised that member countries of the UPU had overwhelmingly voted to amend the UPU convention to include lithium batteries contained in equipment as dangerous goods permitted in international mail. At that time the DGP did not support the proposal by the UPU to permit lithium batteries in air mail due to concerns of panel members that DPOs did not have adequate knowledge, procedures or training for their personnel to safely allow lithium batteries in international air mail.

1.4 At the time that UPU lobbied the DGP to permit lithium batteries in mail, the UPU advised that a significant number of DPOs were looking to avail themselves of the growing e-commerce market and to be able compete with other service providers and that without the changes to the Technical Instructions to align to the UPU Convention they would be unable to do so.

1.5 Almost eight years later there are just 32 DPOs that have an approval from their civil aviation authority to accept lithium batteries contained in equipment.

1.6 However, that does not mean that only DPOs approved are accepting lithium batteries in mail. There are DPOs that do not hold an approval that accept the e-commerce business, including mail articles with lithium batteries contained in equipment. These DPOs simply turn the mail into cargo to be transported by air to an intermediate point at which time it is transformed back into mail for delivery to the customer.

1.7 Recently IATA was made aware of an arrangement being entered into by a DPO that does not have an approval to accept lithium batteries in mail, where they have partnered with a logistics provider that would process e-commerce, including lithium batteries contained in equipment, and load the e-commerce articles into mail bags, presumably with CN documentation. These mail bags would be offered by the DPO as cargo at the cargo terminal through their designated freight forwarder using an air waybill. At destination this “cargo” would be handed over to the destination DPO, using the CN documentation for delivery using the destination mail system.

1.8 This DPO is not alone in avoiding the process put in place by the DGP to address the safety concerns of e-commerce in mail, but this particular example is probably the most blatant.

1.9 What this does raise is concern at just what processes are in place for the oversight of the DPOs by the civil aviation authorities. When the DGP agreed to the UPU request to permit DPOs to accept lithium batteries in international air mail, provisions were added into Annex 18 mandating that procedures of DPOs for controlling the introduction of dangerous goods in mail must be approved by the civil aviation authority. This requirement was also added to Part 1;2.3 in the Technical Instructions along with a requirement in Part 1;4 that dangerous goods training programmes of DPOs must be approved by the civil aviation authority.

1.10 Was this approval a one-time effort, or are civil aviation authorities performing ongoing oversight and surveillance of the DPOs dangerous goods training and procedures to prevent the introduction of dangerous goods in mail into air transport? Have all DPOs had their dangerous goods training and procedures approved?

1.11 It is IATA’s view that given the significant risk posed by undeclared dangerous goods in mail offered for air transport that there should be consideration of reviewing the current provisions to include additional controls and checks to ensure that DPOs follow both the letter and intent of the provisions set out in Part 1;2.3.

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