



WORKING PAPER

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

Virtual, 19 to 23 October 2020

Agenda Item 2: Managing air-specific safety risks and identifying anomalies

2.2: Develop proposals, if necessary, for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2023-2024 Edition

INCLUSION OF ALCOHOL-BASED HAND SANITIZER INTO PART 1;2.2

(Presented by D. Brennan)

SUMMARY

This working paper proposes a revision to Part 1;2.2 (Exceptions for dangerous goods of the operator) to permit under Part 1;2.2.1 the carriage of alcohol-based cleaning products and hand sanitizer for the purposes of crew and passenger hygiene.

Action by the DGP-WG: The DGP-WG is invited to consider the revision to Part 1;2.2.1 as shown in the appendix to this working paper. If adopted, the DGP-WG is invited to agree that these revisions should be implemented through an addendum to the 2019-2020 and 2021-2022 editions of the Technical Instructions.

1. INTRODUCTION

1.1 The coronavirus pandemic has had a massive impact on global aviation with international passenger travel down by approximately 80 to 90% over 2019 numbers. As operators look to restart passenger flights, there is a focus on ensuring that passengers and air crew are protected from the virus while on board an aircraft.

1.2 To ensure that the aircraft cabin, including galleys and lavatories are always clean many operators are looking to carry alcohol-based cleaning products and hand sanitizers for use by flight crew, cabin crew and passengers. Some operators are also looking to, or have added, small bottles of alcohol-based hand sanitizer in amenity kits provided to premium class passengers.

1.3 The provision of a safe, sanitary operating environment for passengers, crew and ground staff is one of the objectives developed by the ICAO Council Aviation Recovery Task Force (CART) in guidance published to address the COVID-19 public health crisis.

1.4 The CART guidance includes a recommendation that airlines “should provide sufficient quantities of cleaning and disinfectant products that are effective against COVID-19 for use during flight.”

1.5 To address the CART guidance recommendations and to support the needs of operators to be able to provide alcohol-based cleaning products and hand sanitizers for use by flight crew, cabin crew and passengers on an aircraft, it is proposed that a specific allowance be added to Part 1;2.2.1 to allow for these to be carried.

1.6 It is recognized that Part 1;2;2.1 a) provides for the aviation authority of the State of the Operator to authorize the carriage “to meet special requirements”, and therefore an authority could authorize the carriage of items such as alcohol-based hand sanitizer without a change to the provisions of the Technical Instructions. However, many operators and authorities in at least some States do not understand the scope or application of the provisions in Part 1;2.2.1 a).

1.7 It is therefore believed that there is value in making a specific allowance for the carriage of alcohol-based cleaning products and hand sanitizers by an operator as proposed in the appendix. Given the urgency of the issue facing operators, it is proposed that if agreed, the changes should be adopted through an addendum to the 2019-2020 and 2021-2022 editions of the Technical Instructions as soon as possible.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider the proposal to revise Part 1;2.2.1 as shown in the appendix to this working paper.

2.2 If the proposal is agreed, the DGP-WG is invited to recommend that the changes to Part 1;2.2.1 be adopted into the 2019-2020 and 2021-2022 editions of the Technical Instructions through an addendum.

APPENDIX

PROPOSED AMENDMENT TO PART 1 OF THE TECHNICAL INSTRUCTIONS

Part 1

GENERAL

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Chapter 2

LIMITATION OF DANGEROUS GOODS ON AIRCRAFT

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2.2 EXCEPTIONS FOR DANGEROUS GOODS OF THE OPERATOR

2.2.1 The provisions of these Instructions do not apply to the following:

- a) articles and substances which would otherwise be classified as dangerous goods but which are required to be aboard the aircraft in accordance with the pertinent airworthiness requirements and operating regulations or that are authorized by the State of the Operator to meet special requirements;
- b) aerosols, alcoholic beverages, perfumes, colognes, liquefied gas lighters and portable electronic devices containing lithium metal or lithium ion cells or batteries provided that the batteries meet the provisions of Table 8-1, Item 1) carried aboard an aircraft by the operator for use or sale on the aircraft during the flight or series of flights, but excluding non-refillable gas lighters and those lighters liable to leak when exposed to reduced pressure;
- c) dry ice intended for use in food and beverage service aboard the aircraft;
- d) alcohol-based hand sanitizers and [alcohol-based] cleaning products carried aboard an aircraft by the operator for the purposes of passenger and crew hygiene;
- e) electronic devices, such as electronic flight bags, personal entertainment devices, and credit card readers, containing lithium metal or lithium ion cells or batteries and spare lithium batteries for such devices carried aboard an aircraft by the operator for use on the aircraft during the flight or series of flights, provided that the batteries meet the provisions of Table 8-1, Item 1). Spare lithium batteries must be individually protected so as to prevent short circuits when not in use. Conditions for the carriage and use of these electronic devices and for the carriage of spare batteries must be provided in the operations manual and/or other appropriate manuals as will enable flight crew, cabin crew and other employees to carry out the functions for which they are responsible.

2.2.2 Unless otherwise authorized by the State of the Operator, articles and substances intended as replacements for those referred to in 2.2.1 a), or articles and substances referred to in 2.2.1 a) which have been removed for replacement, must be transported in accordance with the provisions of these Instructions, except that when consigned by operators, they may be carried in containers specially designed for their transport, provided such containers are capable of meeting at least the requirements for the packagings specified in these Instructions for the items packed in the containers.

2.2.3 Unless otherwise authorized by the State of the Operator, articles and substances intended as replacements for those referred to in 2.2.1 b) ~~and c)~~ and d) must be transported in accordance with the provisions of these Instructions.

2.2.4 Unless otherwise authorized by the State of the Operator, battery-powered devices with installed batteries and spare batteries intended as replacements for those referred to in 2.2.1 ~~d)~~ e) must be transported in accordance with the provisions of these Instructions.

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