



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
MEETING OF THE WORKING GROUP OF THE WHOLE**

Montréal, 15 to 19 October 2012

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284)* for incorporation in the 2015-2016 Edition

2.7: Part 7 — Operator's Responsibilities

ACCEPTANCE CHECKS

(Presented by G A Leach)

SUMMARY

This paper proposes to clarify the requirements regarding when an acceptance check needs to be conducted.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Part 7;1.3 of the Technical Instructions requires the operator to verify packages, overpacks, freight containers and unit load devices and accompanying documentation, as far as is practicable, comply with the requirements of the Technical Instructions. This is generally known as the "acceptance check". Many dangerous goods will be transported on more than one aircraft (and possibly operator) as part of their journey and it has been interpreted by some operators and regulators that an acceptance check must be conducted prior to loading on each aircraft.

1.2 It is suggested that the acceptance check should only be *required* prior to the dangerous goods first being accepted for carriage (if an operator wishes to conduct acceptance checks prior to carriage on each aircraft that is their prerogative). Prior to loading on subsequent aircraft the operator should be responsible for ensuring a consignment *continues* to be compliant (as far as any operator can) and so only needs to check those aspects which could have changed since initial acceptance, e.g. a label may have fallen off (in which they can replace it as per 7;2.6) or a package may have incurred damage during its previous leg (in which case, depending on the degree of damage, it may require re-packing). This is not an "acceptance check" but more akin to the inspection required by 7;3.1.1. It should be reasonable for an operator to assume the original acceptance check was conducted properly and consequently should not have to re-check those aspects covered by 7;1.3 which cannot change since initial acceptance e.g. the quantity is within limits, UN spec of the package is appropriate for the contents,

the outer is a permitted type. It is suggested Part 7;1.3 should be clarified to this effect.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to amend Part 7;1.3.1 of the Technical Instructions as presented in the appendix to this working paper.

APPENDIX

APPENDIX TO THE TECHNICAL INSTRUCTIONS

Part 7

OPERATOR'S RESPONSIBILITIES

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1.3 THE ACCEPTANCE CHECK

1.3.1 ~~An operator must not accept for transport aboard an aircraft~~ Before a consignment consisting of a package or overpack containing dangerous goods ~~or~~ a freight container containing radioactive material or a unit load device or other type of pallet containing dangerous goods as described in 1.4 ~~unless~~ is first accepted for carriage by air the operator ~~has~~ must, by use of a checklist, ~~verify~~ verify the following:

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Note 1.— Minor discrepancies, such as the omission of dots and commas in the proper shipping name appearing on the transport document or on package markings, or minor variations in hazard labels which do not affect the obvious meaning of the label, are not considered as errors if they do not compromise safety and should not be considered as reason for rejecting a consignment.

Note 2.— Where packages are contained in an overpack or freight container, as permitted by 1.4, the checklist should establish the correct marking and labelling of such an overpack or other type of pallet or freight container and not the individual packages contained in them. Where packages are contained in a unit load device, as permitted by 1.4.1, the checklist should not require the checking of packages individually for the correct marking and labelling.

Note 3.— An acceptance check is not required for dangerous goods in excepted quantities and radioactive material in excepted packages.

Note 4.— Although the acceptance check required in 1.3.1 is only required to be conducted when a consignment of dangerous goods is first accepted for carriage by air, the operator of any subsequent aircraft used as part of the same journey should verify that packages, overpacks, freight containers and unit load devices continue to meet the requirements of these Instructions in respect of marking, labelling and damage.

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