



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

2.1: Part 1 — General

NEW REQUIREMENTS FOR DESIGNATED POSTAL OPERATORS

(Presented by T. Muller)

SUMMARY

The introduction of the new requirements for designated postal operators in the 2013-2014 Edition of the Technical Instructions has already caused some confusion and discussion amongst the different concerned parties. The DGP is invited to discuss the various interpretations and to consider if some amendments are needed in order to clarify the current situation.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 The following two new paragraphs have been introduced in 1;2.3 of the 2013-2014 Edition of the Technical Instructions:

2.3.3 The procedures of designated postal operators for controlling the introduction of dangerous goods in mail into air transport are subject to review and approval by the civil aviation authority of the State where the mail is accepted.

2.3.4 Before a designated postal operator can introduce the acceptance of lithium batteries as identified in 2.3.2 d) and e) they must have received specific approval from the civil aviation authority.

Note 1. — Designated postal operators may accept the dangerous goods identified in 2.3.2 a), b) and c) without receiving specific approval from the civil aviation authority.

1.2 Reading the first new paragraph 2.3.3, it could be interpreted that introduction of dangerous goods in mail into air transport is forbidden as long as the procedures of the designated postal operators are not reviewed and approved. This would mean that dangerous goods, including dangerous goods which have been accepted in the mail for many years, can no longer be accepted in the majority of States as procedures have not yet been reviewed and approved. We believe that this has never been the intention.

1.3 Reading paragraph 2.3.4 gives the idea that in addition to the approval required under 2.3.3 an additional specific approval is required for the transport of lithium batteries. We are wondering if there is any added value.

1.4 In our opinion it has always been the intention to forbid the acceptance of lithium batteries in the post until the procedures for introducing and accepting these commodities in the post have been reviewed and approved by the civil aviation authority. The dangerous goods which were already in the past acceptable in the post may currently continue to be transported without this approval. However it seems obvious that when an approval is issued it takes care of all dangerous goods not only the lithium batteries. In case a designated postal operator does not wish to accept lithium batteries it might be wishful to introduce a transitional period for the application of an approval for the other dangerous goods.

1.5 An amendment to 1;4.1.2 requires that training programmes established by designated postal operators must from 1 January 2013 be subjected to review and approval by the civil aviation authority of the State where the mail was accepted by the designated postal operator. This training programme must not only include the transport of lithium batteries but must take into account all dangerous goods allowed in the post as well as the dangerous goods forbidden in airmail. As a consequence, if staff are not properly trained in accordance with the approved training programme, dangerous goods must not be accepted. This would mean in our opinion that from a legal viewpoint the transport of all dangerous goods in the post need to be stopped from 1 January 2013 as long as it is not in compliance with the regulations.

2. ACTION BY THE DGP-WG

2.1 The DGP is invited to discuss the encountered problems and interpretations and to provide possible solutions. If a consensus can be reached that some changes are needed to the current text, a formal proposal will be made for the next working group.

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