



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

REQUIREMENT FOR THE TECHNICAL NAME ON THE WRITTEN INFORMATION TO THE PILOT-IN-COMMAND

(Presented by D. Brennan)

SUMMARY

This working paper proposes that the requirement for the technical name to be added following the proper shipping name be reviewed with respect to inclusion on the written information to the pilot-in-command.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 The requirement for the technical name to be included to the written information to the pilot-in-command (NOTOC) following the proper shipping name, when a technical name is shown on the dangerous goods transport document creates significant problems for operators and the value of this information to the pilot-in-command is questioned.

1.2 Almost all of the larger operators and many small / medium size operators utilise computer systems to collate the information for dangerous goods carried as cargo on the NOTOC. Many of these computer systems incorporate a database of the list of dangerous goods that provide error checking of the data and prompts for certain information. This has been done to assist in provision of accurate information while minimising data entry, which can be a source of transcription error.

1.3 One area where there is no ability to provide error checking of the information on the NOTOC is with the technical name. Operators are seeing an increase in substances where a technical name is required, which is adding to the existing problem. Some of this increase is in relation to environmentally hazardous substances. This is occurring as the formulations for substances such as printing inks, paints, aromatic liquids and flavourings are revised to reduce or eliminate the use of flammable solvents.

1.4 The reduction in the use of flammable solvents is being done to reduce the risk of these products in the workplace. However, for transport the result is that instead of a proper shipping name such as “paint”, “printing ink”, “extracts, aromatic, liquid” or “extracts, flavouring, liquid” being on the dangerous goods transport document and consequently on the NOTOC the operator is being faced with entries such as “environmentally hazardous substances, liquid, n.o.s (Cyclopropanecarboxylic acid, trans-(+)-3-(2,2-dichloroethenyl)-2,2-dimethyl-, (S)-cyano(3-phenoxyphenyl)methylester)”.

1.5 It is questioned as to the benefit of providing this technical name on the NOTOC, particularly as instead of one line item such as “UN 1169, **Extracts, aromatic, liquid**, II, number, type of packagings, net quantity” there may be multiple line items, each with a slightly different technical name as the aroma is different. The result of requiring the technical name is a significantly longer, more complex NOTOC that contains additional, irrelevant information.

1.6 Another example applies to self-reactive substances in Division 4.1 and to organic peroxides where the technical name shown on the dangerous goods transport document is likely incomprehensible to anyone except a chemist who specialises in these substances; so the relevance and value appears to be little or none of requiring the operator to transcribe from the dangerous goods transport document on to the NOTOC a technical name such as: “tert-Butyl peroxy-2-ethylhexanoate with 2,2-Di-(tert-butylperoxy) butane” or “1,1-Di-(tert-butylperoxy)cyclohexane with tert-butyl peroxy-2-ethylhexanoate”.

1.7 In looking at the *Emergency Response Guidance for Aircraft Incidents Involving Dangerous Goods* (Doc 9481), which is typically the information provided to flight crew to address dangerous goods incidents, the drill codes and the associated emergency response drills are based on the UN number and with a small number of entries, the packing group. The technical name, when required, is not taken into account for the action required.

1.8 The same rationale applies to the information contained in the North American *Emergency Response Guidebook*. Here too the “initial” emergency response is determined by the UN number without regard for any substance with a technical name.

1.9 It is acknowledged that the details of the technical name will be required by emergency responders in the phases following the initial emergency response. At this stage however it is very likely that the information on the NOTOC alone will be insufficient for these purposes and the emergency responders will probably be looking for much more detailed information that can only be provided by the shipper such as material safety data sheets.

1.10 In the time following the initial emergency response the operators are in a position to gather all of the dangerous goods transport documents applicable to the flight in question, which provides shipper and consignee information and therefore access to more detailed information.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to amend Part 7;4.1.1 of the Technical Instructions as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO THE TECHNICAL INSTRUCTIONS

Part 7
OPERATOR'S RESPONSIBILITIES

...

Chapter 4

PROVISION OF INFORMATION

...

4.1 INFORMATION TO THE PILOT-IN-COMMAND

4.1.1 As early as practicable before departure of the aircraft, but in no case later than when the aircraft moves under its own power, the operator of an aircraft in which dangerous goods are to be carried must:

- a) provide the pilot-in-command with accurate and legible written or printed information concerning dangerous goods that are to be carried as cargo; and
- b) from 1 January 2014, provide personnel with responsibilities for operational control of the aircraft (e.g. the flight operations officer, flight dispatcher, or designated ground personnel responsible for flight operations) with the same information that is required to be provided to the pilot-in-command (e.g. a copy of the written information provided to the pilot-in-command). Each operator must specify the personnel (job title or function) to be provided this information in their operations manual and/or other appropriate manuals.

...

Except as otherwise provided, this information must include the following:

- a) the air waybill number (when issued);
- b) the proper shipping name (~~supplemented with the technical name(s) if appropriate~~) (the technical name(s) shown on the dangerous goods transport document are not required) (see 3;1) and UN Number or ID number as listed in these Instructions. When chemical oxygen generators contained in protective breathing equipment (PBE) are being transported under Special Provision A144, the proper shipping name of "oxygen generator, chemical" must be supplemented with the statement "Aircrew protective breathing equipment (smoke hood) in accordance with Special Provision A144".

...

— END —