



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

Montréal, 15 to 19 October 2012

- Agenda Item 6: Resolution, where possible, of the non-recurrent work items identified by Air Navigation Commission or the Dangerous Goods Panel**
6.5: Coordination with international organizations (e.g. Universal Postal Union (UPU))

**REPORT OF THE AD-HOC WORKING GROUP ON THE REVIEW AND APPROVAL OF
DESIGNATED POSTAL OPERATORS AND THE PROVISION OF APPROPRIATE
GUIDANCE TO STATE CAAS**

(Presented by J McLaughlin)
(Prepared by K Miller and B Firkins)

SUMMARY

An ad-hoc working group was formed during DGP-WG/12 to study the recently introduced requirements for Civil Aviation Authorities (CAAs) to review and approve their State Designated Postal Operator's (DPO) procedures to control the introduction of dangerous goods, including lithium batteries contained in equipment, onto aircraft.

The group considered, prepared and developed a range of guidance material for States which has been proposed at Section 3 and the associated appendices.

1. INTRODUCTION

1.1 Following the Working Group of the Whole's initial discussion of DGP-WG/12-WP/1 and DGP-WG/12-WP/44 it was determined that an ad-hoc working group was necessary to develop additional guidance and to provide clarification to States as they proceed with their review and approval of State DPOs as required in Part 1; 2.3.3 and Part 1; 2.3.4 of the ICAO *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) (TIs).

1.2 The Secretary informed the ad-hoc working group that while both the International Civil Aviation Organization (ICAO) and the Universal Postal Union (UPU) had important roles in ensuring the safety of airmail, it was believed by the Dangerous Goods Panel (DGP) that the Chicago Convention took precedence with respect to the dangerous goods regulations governing mail transported by aircraft.

1.3 The Secretary indicated that a revised ICAO/UPU Memorandum of Understanding could be developed to more adequately reflect dangerous goods related safety concerns of airmail. It is hoped that the UPU will be represented at future ICAO DGP meetings whenever postal-related issues are proposed for discussion.

1.4 Although Part S-1;3 of the Supplement to the Technical Instructions was adopted to provide some guidance on the requirements adopted during DGP-WG/LB/1, the Secretary suggested, and the working group agreed that additional guidance was needed for both CAAs and DPOs. Given the time sensitivity of these issues, any guidance developed would need to be posted on the ICAO website in addition to inclusion in the 2015-2016 Supplement. It was considered that separate State letters, sent concurrently from the UPU to DPOs and from ICAO to CAAs was the preferred option for raising stakeholder awareness.

2. ISSUES, DISCUSSION AND IDENTIFIED APPROACHES

2.1 Applicability identification and communication with DPOs

2.1.1 During the ad-hoc working group, there was some discussion regarding the applicability of Part 1;2 review and approval requirements. Some members indicated that the complexities of mail in their states meant that freight forwarders, multiple governmental entities, and/or 3rd party private entities could all be subject to CAA approval. It was observed that applicability in the ICAO TIs is limited to DPOs; that this role is defined by the UPU and that it would be the DPO's responsibility to ensure the compliance of their contracted entities.

2.1.2 At least one member alluded to current difficulties in starting discussions with their DPO, and suggested that threat of stopping postal operations may become necessary. It was assumed that many other State CAAs not participating on the DGP may have similar difficulties in collaborating with their DPO counterparts.

2.1.3 Most members agreed that CAA approval even for DPOs not electing to transport dangerous goods was essential. One member pointed out that having no controls for introducing dangerous goods by post was a danger to civil aviation as well as the DPO. Some members suggested the practical difficulty of halting their DPO's operations (including non-dangerous goods related transport) in the event a timely approval did not occur. Others agreed that this outcome would be problematic, and that the first step should be to begin a dialogue between CAAs and DPOs.

2.1.4 The Secretary suggested that where State CAAs experienced difficulty in initiating discussions with DPOs they should contact her so she could liaise with UPU counterparts. The Secretary also reminded the group that procedures should already be in place for non-lithium battery transport.

2.1.5 The Secretary shared with the group a draft UPU State letter. With respect to establishing a timeline for review, the draft State letter (at the time of the ad-hoc working group read as follows:

Designated operators should meet with their respective CAA to establish a timeline for review, acceptance and implementation if necessary. The timeframes will be left to the designated operator and their respective civil aviation authority in order to allow for flexibility based on local priorities.

2.1.6 There was general support with adopting language that encouraged mutual co-operation, respect and local flexibility.

2.1.7 In an effort to facilitate dialogue between State CAAs and DPOs, the Secretary indicated that links to a list of DPO and CAA contacts for each State could be provided on the ICAO and UPU websites.

2.1.8 There was general agreement that a three-tiered classification would best reflect the different options DPOs could choose with respect to the control and acceptance of DG. The classifications were:

- a) DPOs electing to not transport dangerous goods at all;
- b) DPOs electing to transport some or all currently allowable dangerous goods, excluding lithium batteries, and
- c) DPOs electing to transport batteries contained in equipment in addition to the acceptance of any allowable dangerous goods.

2.1.9 It would also be made clear that DPOs could elect to accept lithium batteries contained in equipment and some or none of the other allowable dangerous goods.

2.2 Implementation of 1 January 2013 and potential early implementation of 1 November 2012

2.2.1 The Secretary also informed the group that the ICAO Council was taking up, and likely to approve, early (November 1st) implementation for DPOs already approved to transport lithium batteries. This was of interest to several States, which have been actively reviewing their State's DPO procedures. It was regarded that a DPO workforce, trained under a CAA's approved program in time for forthcoming peak seasonal load, would be of an additional aviation safety benefit.

2.2.2 Most agreed that in hindsight, a transition period for general DPO approval would have been preferred. However, the Secretary indicated that an additional change, at this point, would not be practicable. Others pointed out that it was equally impracticable to stop mail or to hold operators liable for a DPO who had not undergone CAA review and approval. In light of these constraints, it was suggested that language in a State letter be issued pointing to guidance published online.

2.3 Status of the DPO's review and approval

2.3.1 There was a brief discussion of an aircraft operator's ability and responsibility to know of a DPO's approval status. It was suggested that an operator ought to be able to at least know the status of their State's (State of certification) DPO approval. Others believed that this approach would present an additional and unfair burden to operators as DPOs should already have adequate procedures in place. It was pointed out that there is no expectation for operators to evaluate the currency of a shipper's training program before accepting an otherwise compliant dangerous goods shipment and therefore Operators should not have to be held to establishing the status of a DPO's program.

2.3.2 It was the group's understanding that the UPU would maintain a list of DPOs which had been approved for Part 1;2.3.4 lithium battery approvals. Such a process would assist international aviation safety in identifying where compliant lithium battery shipments were found in mail from States which did not hold approval and where non-complying shipments could be referred to the relevant DPO for investigation and improvement of their procedures.

2.3.3 In establishing the status of the degree of compliance by States in reviewing and approving procedures in accordance with 1;2.3.3, it was determined that the most efficient and least onerous system upon States and DPOs was for an ICAO State letter which could communicate the DGP's expectation for CAAs to report to ICAO on the status of their Part 1;2.3.3 approvals before December 31, 2013.

2.3.4 Consideration was given to requesting action "as soon as possible" however many in the group believed that any earlier timeframe was unrealistic. Most reviews would require a resource intensive process, the 2013-2014 TIs have not yet become effective, and anecdotal evidence suggests many CAAs and DPOs have not yet begun discussions. Those States that had been through the process were offered a more realistic timeframe for the work required. It was suggested that a State letter could also underscore the complexity of this process.

2.3.5 In response to a question from one member, it was clarified that the approval by a CAA of their State's DPO to transport lithium batteries contained in equipment was the only approval needed for that DPO to transport lithium batteries internationally. In other words, the approval of other States (such as States of Destination, State of the Operator, etc.) was not required.

2.4 **Process for a Review**

2.4.1 There was considerable discussion over the differences in language and resulting implications between:

- a) Part 1;2.3.3 "are subject to review and approval" procedures for controlling the introduction of dangerous goods by mail; and
- b) Part 1;2.3.4 "must have received specific approval" applicable to lithium batteries contained in equipment when transported by post.

2.4.2 While all agreed that Part 1;2.3.4 required CAA approval before lithium batteries could be accepted by DPOs, some viewed Part 1;2.3.3 as merely reserving CAA's the right to review and approve a DPO's overall dangerous goods acceptance/rejection program. Others suggested that this type of interpretation would alter the intended meaning of Table 1-4 training requirements. Read in conjunction with Note 1 to Part 1;2.3.4, only the procedures for the introduction of dangerous goods would require CAA review and approval, while CAA approval would not be required for specific procedures relating to allowable, non-lithium battery dangerous goods.

2.4.3 Following the group's meeting, two States circulated the framework they are utilizing in conducting their review and approval. These frameworks are largely a derivation of Table 1-6 and S-1;3.2. A presentation to the Working Group of a Whole from a third State's DPO was also helpful in outlining that State's approach as well as in providing the DGP with the a DPO's perspective.

2.5 **Guidance for States**

2.5.1 There was interest in developing a Q&A document which, when posted online, could serve as one means of guidance to State CAAs and DPOs in advance of the next publication of the Supplement.

2.5.2 Many members believed that while guidance and clarification would be helpful, that State-specific differences ultimately meant that each State would have to develop their own implementation process for Part 1; 2.3 requirements.

2.5.3 Two tables intended to assist CAAs in the review process were circulated amongst the group. There was tentative support for this approach. It was noted that the elements largely focus on the front-end of a DPO's system and that an additional element was necessary to address DPO procedures (recognition, handling, reporting, etc.) once dangerous goods were already introduced into the system (e.g. drop boxes).

2.5.4 The group was also supportive of the idea of encouraging CAAs to contact DGP members, especially those who were further ahead in their own review and approval process. The idea of the UPU compiling a similar list of DPOs who have obtained (or were close to obtaining) CAA approval for the benefit of other DPOs was also supported.

2.5.5 In an effort to further guide CAAs (and perhaps DPOs as well) it was suggested that a sample 12-month timeline be included in any guidance published by Secretary. This would further illustrate to CAAs and DPOs the time and resources that may need to be dedicated in a thorough review and approval process.

3. PROPOSED GUIDANCE MATERIAL

3.1 Based on the above-mentioned considerations, the working group developed several pieces of guidance material for use by CAAs and DPOs. It was the intent of the working group to assist stakeholders in meeting the requirements of the ICAO Technical Instructions. The supplemental information below should therefore be construed as one means to addressing requirements already adopted by the DGP and incorporated in the 2013-2014 Technical Instructions.

- a) Appendix A: Draft State letter to CAAs;
- b) Copy of the letter from the UPU to DPOs – not yet received;
- c) Website link to designated postal operators of the UPU – not yet received;
- d) Appendix B: Draft guidance information of the elements that will assist CAAs and DPOs in preparing for a review of the DPO training and procedures;
- e) Appendix C: Draft indicative evidence guide against the elements that will assist State CAA inspectors when conducting an on-site review;
- f) General public educational and information material – currently being gathered;
- g) Internal DPO educational material – currently being gathered;
- h) Table 1-6 from the Technical Instructions relating to training requirements;
- i) Appendix D: Draft suggested timetable for CAAs to undertake the review and approval process;
- j) Contact list of personnel from CAAs and DPOs that have prior experience in the process and who can be contacted for practical information – Currently being collated;
- k) Appendix E: Draft list of what are anticipated to be frequently asked questions – both for CAAs and DPOs; and
- l) Links to Lithium Battery Packing Instruction guidance material for DPOs and their customers — to be commenced.

APPENDIX A

DRAFT STATE LETTER TO CAAs

[Opening paragraph]

The International Civil Aviation Organization (ICAO) Annex 18 states that each Contracting State should establish procedures with a view to controlling the introduction of dangerous goods into air transport through its postal services. The ICAO Dangerous Goods Panel (DGP) has recently recommended that this recommendation be changed to a requirement.

Article 11 of the Universal Postal Union (UPU) Parcel Post Manual, <http://www.upu.int/nc/en/the-upu/acts/acts-in-four-volumes.html> provides that:

- 1.1 Member countries shall undertake to adopt the necessary measures to prevent, prosecute and punish any person found guilty of the following:
 - 1.1.1 the insertion in postal items of narcotics and psychotropic substances, as well as explosive, flammable or other dangerous substances, where their insertion has not been expressly authorized by the Convention;

In February of 2012, in the interests of aviation safety, the ICAO *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) (TIs) were amended in order to harmonize both organizations in controlling the introduction of dangerous goods into the postal network and ultimately into air transport.

- 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.

This amendment to the TIs will require each Civil Aviation Authority (CAA) to review and approve the procedures of the designated postal operators (DPOs) in their State.

The UPU has been proactive in alerting their DPOs of the increased attention to these requirements. A copy of the UPU State letter is attached to this letter.

The procedures to control the introduction of dangerous goods, and importantly to screen out those dangerous goods not permitted in the airmail, will be an integrated system that comprises:

- a) management responsibility and commitment;
- b) proactive steps (information and education to customers of items that cannot be sent, the DPO internal audit or continuous monitoring and improvement processes);
- c) defensive measures (training, screening, documented and standardized processes); and
- d) Reactive remediation (incident investigation, reporting and trend monitoring).

A number of CAAs will not have previously conducted a review of the DPOs in their State. It is recognized that conducting the first review and oversight will be a large exercise and ICAO is interested in ensuring that these reviews are undertaken in a timely manner. To that end, ICAO will be requiring each CAA to report by 31 December 2013 on the progress that has been made in reviewing and approving their State DPO.

In order to assist CAAs in this process, a range of guidance material is being produced by the ICAO DGP and will be made available on the ICAO website. This material will be continuously reviewed and improved in the light of comments and feedback from CAAs, DPOs and the UPU.

The material includes:

- a) a copy of the letter from the UPU to DPOs;
- b) links to DPOs of the UPU;
- c) guidance information of the elements that will assist CAAs and DPOs in preparing for a review of the DPO training and procedures;
- d) an indicative evidence guide against the elements that will assist State CAA inspectors when conducting an on-site review;
- e) general public educational and information material;
- f) internal DPO educational material;
- g) Table 1-6 from the Technical Instructions relating to training requirements;
- h) a suggested timetable for CAAs to undertake the review and approval process;
- i) contact list of personnel from CAAs and DPOs that have prior experience in the process and who can be contacted for practical information;
- j) a list of what are anticipated to be Frequently Asked Questions – both for CAAs and DPOs; and
- k) links to Lithium Battery Packing Instruction guidance material.

ICAO would recommend the first review to be completed by 31 December 2013. An indicative activity-based timetable, based on the experience of several States, has been provided. CAAs and their respective DPOs should establish a mutually convenient and realistic timeline, which takes into account local priorities and operational and budgetary constraints, to complete the review process.

For many CAAs and DPOs, the review and approval process will be a learning experience for both parties and require an appropriate allocation of resources and effort. The timeframe should not be underestimated. In many areas, there are no new requirements for the DPO, and the exercise will be a formalization of existing procedures.

Another amendment to the Technical Instructions relates to the introduction of lithium batteries in the airmail.

- 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.

Subparagraphs 2.3.2 d) and e) respectively are:

- 2.3.2 d) **Lithium ion batteries contained in equipment** (UN 3481) meeting the provisions of Section II of Packing Instruction 967. No more than four cells or two batteries may be mailed in any single package; and
- 2.3.2 e) **Lithium metal batteries contained in equipment** (UN 3091) meeting the provisions of Section II of Packing Instruction 970. No more than four cells or two batteries may be mailed in any single package.

Guidance information in respect to lithium batteries will also be provided on the ICAO website.

ICAO and the UPU are committed towards mutual co-operation and the proactive partnership between State CAAs and their DPOs in ensuring that UPU obligations and the safety of the air transportation system are met.

In the event that State CAAs encounter difficulties in making contact with the relevant responsible personnel in their DPO, then the State is encouraged to contact Dr. Katherine Rooney at dgs@icao.int who will facilitate communication through the UPU. The same courtesy will be extended to DPOs that are unsuccessful in establishing contact with their CAA.

ICAO will send a proforma survey form to States in November 2013, for completion in December 2013, in order to determine where the level of compliance by States with the Technical Instructions.

[Closing paragraph]

APPENDIX B

ELEMENTS THAT MAY ASSIST CAAs AND DPOs IN PREPARING FOR A REVIEW OF THE DPO TRAINING AND PROCEDURES, AND COMPLIANCE WITH THE ICAO TECHNICAL INSTRUCTIONS FOR THE SAFE TRANSPORT OF DANGEROUS GOODS BY AIR

For publication online, as an attachment to a State letter, and in the Supplement to the ICAO TIs

A State DPO may choose to accept any of the dangerous goods allowable under Part 1;2.3.2 of the ICAO TIs. However, even DPOs who prohibit the acceptance of any dangerous goods are required by ICAO and the UPU to have procedures for controlling the introduction of dangerous goods in mail into air transport. Table 1 below provides CAAs some of the elements they wish to consider in evaluating their DPO.

Note that DPOs accepting allowable dangerous goods, but not lithium batteries contained in equipment, may continue to accept these dangerous goods while they undergo their CAA’s formal review and approval. However, lithium batteries may not be accepted by a DPO until they have received their CAA’s specific approval as required by Part 1; 2.3.4 of the ICAO TIs.

Element	Citation (S-1; 3.2.2 unless otherwise stated)	DPO CLASSIFICATION		
		FORBIDDEN FROM DG TRANSPORT	DG/NON-LITHIUM BATTERY TRANSPORT	LITHIUM BATTERY TRANSPORT
Training of staff in accordance with Part 1;4 of the Technical Instructions	a)	X	X	X
Reporting of dangerous goods accidents and incidents to civil aviation authorities	b)	X	X	X
Reporting of hidden and undeclared dangerous goods to civil aviation authorities	c)	X	X	X
Provision of information to customers at acceptance points (e.g. street post boxes, post offices, agencies, websites)	d)	X	X	X
Provision of information to account customers regarding dangerous goods	e)	X	X	X
Inclusion of clauses in contracts with account customers regarding dangerous goods not permitted in the mail	f)	X	X	X

Emergency procedures	g)	X	X	X
Retention of documents (e.g. dry ice acceptance checklist)	h)		X	X
Documented acceptance procedures for staff regarding the dangerous goods allowed by Part 1;2.3 of the Technical Instructions	i)		X	X
Procedures for requiring the sender's name, address and signature on packages containing dangerous goods	j)		X	X
Procedures for ensuring that any State or Operator variations in Attachment 3 of the Technical Instructions are complied with	k)		X	X
Procedures for ensuring that any changes to the Technical Instructions are incorporated into existing procedures	l)	X	X	X
Procedures for the handling of packages rejected from transport	m)	X	X	X
Procedures for the recognition, handling, and reporting of dangerous goods after acceptance. (e.g. dangerous goods offered by drop boxes or improper acceptance or found having come from a foreign country).	Table 1-6, "Category C" Staff Training Requirements	X	X	X
The designated postal operator has documented procedures for the acceptance of mail containing "Patient specimens"	1;2.3.2 2;6.3.1.4 2;6.3.2.3.6		If Accepted by DPO	
The designated postal operator has documented procedures for the acceptance of mail containing " Infectious substance ", Category B (UN 3373)	1;2.3.2 PI 650		If Accepted by DPO	
The designated postal operator has documented procedures for the acceptance of mail containing " Dry Ice (UN 1845)" packed with UN 3373	1;2.3.2 PI 650 PI 954		If Accepted by DPO	
The designated postal operator has established documented procedures for the acceptance of mail containing "radioactive material, the activity of which does not exceed one-tenth of that listed in Table 2-15"	1;2.3.2 Table 2-15		If Accepted by DPO	
The designated postal operator has established documented procedures for the acceptance of mail containing " lithium ion batteries contained in	1;2.3.2 Section II of Packing			X

equipment (UN 3481)"	Instruction 967			
The designated postal operator has established documented procedures for the acceptance of mail containing "lithium metal batteries contained in equipment (UN 3091)"	1;2.3.2 Section II of Packing Instruction 970			X

APPENDIX C

INDICATIVE EVIDENCE GUIDE FOR STATE CAAs WHEN EVALUATING ELEMENTS IN APPENDIX B

For publication online, as an attachment to a State letter, and in the Supplement to the ICAO TIs Table 2 below is offered as guidance State CAAs may choose to consider when evaluating specific elements of a DPO’s program and procedures.

Element	Citation (S-1; 3.2.2 unless otherwise stated)	Questions or Information which may be Considered	Examples of Compliance Measures
Training of staff in accordance with Part 1;4 of the Technical Instructions	a)	<p>Have DPO personnel been trained to commensurate with their responsibilities?</p> <p>Have the personnel listed in the Table 1-6 below received training in the subject areas identified by the ICAO Technical Instructions?</p> <p>Does the DPO have verifiable records of training received?</p>	<ul style="list-style-type: none"> • Training is relevant to the duties of the employees • Review the training courses • Classroom training, interactive video conferencing, web based training, local office training, etc. • System/database for maintaining training records • System for managing and scheduling recurrent training requirements
Reporting of dangerous goods accidents and incidents to civil aviation authorities	b)	<p>Does the DPO have a system in place to receive incident data on dangerous goods issues from throughout its system?</p> <p>Does the system track all classes of dangerous goods or is it limited to collecting information for only serious incidents?</p> <p>Does the DPO system track reports of</p>	<ul style="list-style-type: none"> • Internal data systems that are used to record dangerous goods incidents or undeclared shipments • Paper reports that are forwarded to regional or headquarters offices for consolidation into annual reports • Requirements for immediate telephonic reports for serious dangerous goods incidents that can

		<p>undeclared dangerous goods?</p> <p>Is there a mechanism by which the DPO can provide the CAA with data on incidents and undeclared dangerous goods?</p>	<p>be consolidated</p> <ul style="list-style-type: none"> Email submissions of incidents or hidden shipments to a central email account An annual report to the CAA of dangerous goods incidents and a mechanism to immediately report serious incidents
Reporting of hidden and undeclared dangerous goods to civil aviation authorities	c)	<p>What are the internal reporting procedures? Who is authorized to report incidents to the CAA?</p> <p>How are reports to be made?</p>	<p>Documented process for report escalation (From Employee to supervisor to facility manager to branch manager to responsible manager)</p> <p>Occurrence management system/database</p>
Provision of information to customers at acceptance points (e.g. street post boxes, post offices, agencies, websites)	d)	<p>Does the DPO provide information to customers on forbidden dangerous goods in its facilities?</p> <p>Does the DPO notify customers who use mailboxes or mail from home of the types of forbidden dangerous goods?</p>	<ul style="list-style-type: none"> Labels on street post boxes Posters and brochures regarding DG that cannot be sent in the airmail Text/images on the website
Provision of information to account customers regarding dangerous goods	e)	<p>Does the DPO provide information to account holders on acceptable and forbidden dangerous goods?</p> <p>Does the DPO include contract language to account holders that informs them of their responsibilities?</p> <p>What does the DPO do in cases where account holders improperly send dangerous goods through the mail?</p>	<ul style="list-style-type: none"> Postal Regulations Standard contract language that is included in each business contract. Providing informational pamphlets or brochures on dangerous goods to customers on a periodic basis. Ongoing training efforts by the DPO to inform each customer of

			<p>acceptable or forbidden dangerous goods in the mail.</p> <ul style="list-style-type: none"> Contractual penalty clauses for account holders who improperly ship dangerous goods.
Inclusion of clauses in contracts with account customers regarding dangerous goods not permitted in the mail	f)		<ul style="list-style-type: none"> Signed contracts
Emergency procedures	g)	<p>Does the DPO have procedures in place to respond to a Dangerous Goods event?</p> <p>If not, does the DPO have existing procedures, in place for responding to suspect packages in the course of post, which can be adapted to provide an appropriate response to a Dangerous Goods event?</p> <p>If so, do the procedures adequately cover the breadth of potential incidents?</p> <p>Does the DPO have a procedure to report the discovery of DGs in the course of post to the CAA?</p> <p>Does the DPO have auditable evidence it reports events to the CAA?</p>	<p>Existing documented response procedures available throughout the DPO.</p> <p>Evidence that the response plan is understood and followed by staff and management.</p> <p>Evidence that the event reporting mechanism informs the DPO of events, responses and improvement activity or remedial action.</p> <p>Evidence that awareness and training is delivered, recorded and quality is assured.</p>
Retention of documents (e.g. dry ice acceptance checklist)	h)	Does the DPO maintain documentation of acceptance and any necessary checklists (for example, dry ice)?	<ul style="list-style-type: none"> Requiring a record to be kept of each shipment of dangerous goods accepted.
Documented acceptance procedures for staff regarding the dangerous goods allowed by Part 1;2.3 of the Technical Instructions	i)	Has the DPO developed acceptance procedures for allowable dangerous goods in the mail including the following: patient specimens, infectious substances, and radioactive materials (lithium batteries in equipment)?	<ul style="list-style-type: none"> Developing procedures that show USPS how to accept allowable dangerous goods Preparing procedures for USPS personnel that would help them to recognize possible improper

			<p>shipments of dangerous goods or undeclared shipments.</p> <ul style="list-style-type: none"> • Requiring management notification of dangerous goods rejected and the reasons why.
Procedures for requiring the senders name, address and signature on packages containing dangerous goods	j)		<ul style="list-style-type: none"> • Acceptance checklist
Procedures for ensuring that any State or Operator variations in Attachment 3 of the Technical Instructions are complied with	k)	<p>Does the DPO have procedures for ensuring that any State or Operator variations in Attachment 3 of the Technical Instructions are complied with?</p> <p>Does the DPO have procedures for ensuring that any changes to the Technical Instructions are incorporated into existing policies and guidance material?</p> <p>How frequently does the DPO update applicable changes, State or Operator variations?</p>	<ul style="list-style-type: none"> • Providing State or Operator variation information to business account holders on a periodic basis. • Listing State of Operator variation information on applicable DPO websites. • Updating all DPO policy documents and references on a periodic basis when ICAO Technical Instruction requirements on dangerous goods in the mail changes. • Providing information to DPO acceptance personnel on significant State or Operator variations concerning dangerous goods allowed in the mail.
Procedures for ensuring that any changes to the Technical Instructions are incorporated into existing procedures	l)	Who in the DPO is the accountable Manager for compliance with DG Regulatory compliance	<ul style="list-style-type: none"> • Providing State or Operator variation information to business account holders on a periodic basis. • Listing State of Operator variation information on applicable DPO website. • Updating all DPO policy documents and references on a periodic basis when ICAO

			<p>Technical Instruction requirements on dangerous goods in the mail changes.</p> <ul style="list-style-type: none"> • Providing information to DPO acceptance personnel on significant State or Operator variations concerning dangerous goods allowed in the mail.
Procedures for the handling of packages rejected from transport	m)	<p>What mechanisms are in place to detect DG that are not allowed in the airmail</p> <p>How does the DPO manage DG items found in the mail</p> <p>How does the DPO try prevent a recurrence</p>	<ul style="list-style-type: none"> • Security screening processes • X-Ray equipment
The designated postal operator has documented procedures for the acceptance of mail containing "Patient specimens"	1;2.3.2 2;6.3.1.4 2;6.3.2.3.6	Has the DPO provided the necessary training to employees?	<ul style="list-style-type: none"> • Acceptance checklist
The designated postal operator has documented procedures for the acceptance of mail containing "Infectious substance, Category B (UN 3373)"	1;2.3.2 PI 650	Has the DPO provided the necessary training to employees?	<ul style="list-style-type: none"> • Acceptance checklist
The designated postal operator has documented procedures for the acceptance of mail containing "Dry Ice (UN 1845)" packed with UN 3373	1;2.3.2 PI 650 PI 954	Has the DPO provided the necessary training to employees?	<ul style="list-style-type: none"> • Acceptance checklist
The designated postal operator has established documented procedures for the acceptance of mail containing "radioactive material, the activity of which does not exceed one-tenth of that listed in Table 2-15"	1;2.3.2 Table 2-15	Has the DPO provided the necessary training to employees?	<ul style="list-style-type: none"> • Acceptance checklist

<p>The designated postal operator has established documented procedures for the acceptance of mail containing "lithium ion batteries contained in equipment (UN 3481)"</p>	<p>1;2.3.2 Section II of PI 967</p>	<p>Has the DPO provided training to employees who may accept devices with lithium batteries of potential hazards posed by the batteries?</p> <p>Does the DPO have policies or other methods in place that would prohibit cells and batteries, identified by a manufacturer as being defective for safety reasons, or devices that are damaged, that have the potential for producing a dangerous evolution of heat, fire, or short circuit are prohibited in the mail?</p> <p>Are there written procedures for accepting lithium batteries in the mail?</p> <p>Are DPO personnel who accept packages containing lithium batteries in equipment trained to understand basic packaging concepts shown in Section II of Packing Instructions 967 and 970, concerning lithium batteries?</p>	<ul style="list-style-type: none"> • Specific training that details lithium battery acceptance requirements. • Written instruction material to acceptance personnel on lithium battery acceptance. • Acceptance checklists that ensure proper procedures are followed. • Specific questions used by DPO personnel to ensure customers offer acceptable types of lithium batteries contained in equipment in the mail. • Specific lithium battery hazard training to postal service acceptance personnel on the hazards posed by lithium batteries.
<p>The designated postal operator has established documented procedures for the acceptance of mail containing "lithium metal batteries contained in equipment (UN 3091)"</p>	<p>1;2.3.2 Section II of PI 970</p>	<p>Are DPO personnel who accept packages trained in the quantity limitations for lithium batteries in equipment (no more than four cells or two batteries) as shown in the ICAO Technical Instructions, Part 1, Chapter 2, 2.3.2.d) and e)?</p> <p>Does the DPO maintain documentation when lithium batteries contained in equipment are accepted?</p>	<ul style="list-style-type: none"> • Written policies that direct DPO personnel to reject any devices containing lithium batteries that are damaged. • Is there general awareness training to any DPO employee who may handle the mail on potential issues from lithium batteries contained in equipment.

APPENDIX D

SAMPLE TIMETABLE FOR CAAS TO UNDERTAKE THE REVIEW AND APPROVAL PROCESS

Phase	Month	CAA	DPO
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">PREPARATION, ASSESSMENT OF THE CURRENT SITUATION AND IDENTIFICATION OF OPPORTUNITIES FOR IMPROVEMENT</p>	January	<p>Identify appropriate Senior Executive management within the DPO who will have accountability for complying with the ICAO Technical Instructions. Initiate contact and arrange for high level meeting.</p>	<p>Identify appropriate Senior Executive management within the DPO who will have accountability for complying with the ICAO Technical Instructions. Identify responsible operational management within the CAA who will be accountable for conducting the review and approval process and the ensuring the appropriate provision of resources.</p>
	February	<p>Formulate operational team: a) Responsible manager; b) CAA/DPO review liaison officer; c) Team leader(s); and d) Inspectors. If the State does not employ a DG or air cargo inspector, then existing flight operations, airworthiness, aerodrome and system safety inspectors ought to have sufficient experience in conducting audits and reviews to be able to constructively review the DPOs procedures for excluding dangerous goods. Where certain dangerous goods are being received and carried, the procedures should be compared against the UPU Parcel Post Manual, http://www.upu.int/nc/en/the-upu/acts/acts-in-four-volumes.html for compliance. Alternatively States may prefer to contract a DG consultant or source a DG trained and experienced operational airline employee. Identify Legislative provisions and potential necessary amendments to review and approve State DPO procedures.</p>	<p>Formulate Management team: a) Accountable executive manager; b) Operations management – customer facing streams; c) Operations management – logistics and air transportation; d) Training management; e) Internal audit; and f) Project manager. Review ICAO/UPU guidance material. Identify entry points of mail and various DG classes into the postal system and subsequent entry points into the air transportation system. Consider adequacy and relevance of existing DPO information and guidance material to the public in preventing DG that is not allowed in the airmail. Identify external/outsourced functions (mail collection, parcel sorting, training). Consider and determine intended final scope of DG carried in airmail (division 6.2/radioactive/lithium batteries) Consider sampling and investigation process to determine approximate volumes of DG being carried at present in airmail.</p>

	March	<p>Conduct high level meetings with DPO – Broad understanding of the DPO’s business. Mail classifications (letters, small parcels, large parcels, etc.). Acceptance points. Location and purposes of major postal sorting facilities How mail is screened to keep DGs out. Existing training programs.</p>	<p>Meet with CAA. Prepare for next phase: a) identify and commence review of current training programs – both internal & external; b) induction training of new employees; c) recurrent training of existing employees; d) commence gathering training courses; e) review systems for maintaining DG training records; f) DG qualifications/experience of existing instructors; g) where training has not been taking place; identify key; and instructors/course developers who will be developing the DG course(s) and provide them with necessary DG training.</p>
	Late march	<p>Formulate program for site visits. Gather documented processes for control/screening of mail, etc. to exclude DG.</p>	
	April	<p>Conduct on-site visits – this is a two way learning process; The emphasis is on a no-blame philosophy. Any deficiencies identified at this location would probably occur in any location and those that are being discovered in your State are unlikely to be different from those found in other States. Deficiencies are in part attributable to an absence of guidance material. This is a learning opportunity for both parties with the resulting goal of improving aviation safety.</p>	<p>Assist CAA with learning visits; Engage with CAA in identifying deficiencies and look to implement enduring and robust fixes. Submit existing training courses/programs (if the DPO believes that they meet current requirements).</p>
CONSOLIDATION, AND IMPROVEMENT	May	<p>Review existing training programs and identify gaps in training syllabus.</p>	<p>Identify promotional and safety-related information needs following the CAA learning visit. Identify and document current procedures and practices or vary where necessary to achieve consistency and air transportation safety. Engage internal audit, business consistency processes and training personnel to formulate.</p>
	June	<p>Observe and review face-to-face instruction course Review process for developing new DG instructors.</p>	<p>Submit new training programs for review and approval by CAA (where required).</p>
	July - August	<p>Review and assess/approve new DG courses.</p>	<p>Conduct internal audit program and branch management engagement. Ensure consistency across business units of the DPO.</p>
	August		

REVIEW AND APPROVAL	September	<p>Conduct another sampling of DPO processes, different facilities, post offices, etc. Confirm that:</p> <ul style="list-style-type: none"> a) gaps identified in learning visits are being closed; b) procedures are (becoming) standardized; c) information about DG is being made available to the public; d) DG incident reporting processes are in place e) the DPO's Internal audit/business improvement sections are actively scheduling DG components in their programs; f) corrective actions are being applied across the whole business. 	<p>Commence remedial training program and identify duration before all employees trained.</p> <p>Consider peak season message/education of public (post presents early, some things may be dangerous and will need to travel by road, etc.)</p>
	October		Ensure that control processes relating to DG are timetabled for review in 2014.
	November	<p>Complete Review and Approval process.</p> <p>Provisionally schedule the next review for 6-12 months' time.</p>	Plan for a sampling exercise in 2014 to review quantities, types, volumes and entry points of DG being carried in airmail.
	December		

APPENDIX E

**DRAFT LIST OF WHAT ARE ANTICIPATED TO BE FREQUENTLY ASKED QUESTIONS –
BOTH FOR CAAs AND DPOs**

General	<p>There is more than one entity in my State who accepts, handles, and/or delivers mail. In many cases these entities are freight forwarders. Who is the CAA required to approve?</p> <p>Or</p> <p>What is a “designated postal operator”?</p>
	<p>The ICAO Technical Instructions require CAA review and approval for <i>Designated Postal Operators (DPOs)</i>. DPO is defined by the UPU as: Any governmental or non-governmental entity officially designated by the member State to operate postal services and to fulfill the related obligations arising from the acts of the Universal Postal Union (UPU) Convention on its territory. A link to each State’s DPO can be found here [_____].</p> <p>All other entities are subject to provisions of the ICAO Technical Instructions governing shippers or freight forwarders, unless they are introducing dangerous goods on behalf <i>and</i> under contract with the State’s DPO.</p>
General	As a DPO, who do I contact in my State to initiate the review and approval process?
	A link to each your State’s ICAO contact can be found here [_____].
General	My State’s DPO is choosing not to accept lithium batteries contained in equipment. Are there still obligations on the CAA or DPO?
	Yes. Mail accepted by DPOs can be transported by aircraft. Therefore, ICAO and the UPU require all DPOs to have in place the necessary training and procedures required in Table 1-6 of the ICAO Technical Instructions (ICAO TIs). Part 1; 2.3.3 of the ICAO TIs requires a State’s CAA review and approval for their State’s DPO.
General	What if a DPO does not have their Part 1;2.3.3 (controls for the introduction of dangerous goods in the mail) approval by January 1, 2013?
	The UPU has long required DPOs to have procedures for controlling the introduction of dangerous goods in mail into air transport. Therefore, the intention is for CAAs and DPOs to formalize these existing procedures. The intent is not for DPOs to cease operations unless and until they receive CAA approval. While many States operate under a complex legal framework that governs airmail oversight responsibilities between State CAAs and DPOs, it is ICAO’s and the UPU’s expectation that CAAs and DPOs will work together to formalize training and

	<p>procedures in order to complete the approval process. More information on ICAO’s reporting of the status of each State’s progress in reviewing and approving their DPO’s procedures can be found in [State Letter _____].</p>
General	<p>Is the CAA required to review and approve each DPO whose dangerous goods lands in, transits, or overflies the State?</p>
	<p>No. the State CAA is only required to review and approve their own State’s DPO’s procedures.</p>
General	<p>May a DPO accept lithium batteries contained in equipment for air transport without CAA review and approval?</p>
	<p>No. Specific CAA review and approval is required to transport lithium batteries contained in equipment. ICAO and the UPU strongly encourage States to formalize other DPO functions listed in Table 1-6 as part of this process.</p>
Review and Approval	<p>How long should the DPO’s procedures and training be approved for? Should it be an open-ended approval?</p>
	<p>This will largely be a function of a CAA’s legislation and legal authority. In some States, CAAs have no formal oversight authority over DPOs. As there is a clear safety benefit to recurrent review and approval, even one-time CAA approvals should have language to ensure a DPO has internal controls or auditing procedures to ensure continuous compliance with the ICAO TI.</p> <p>Some States will have greater oversight authority and therefore discretion. In these instances, States are encouraged to limit approval cycles to 2-3 years, at least initially, as a mechanism to ensure that the DPO is maintaining their DG training and that the DG requirements are being kept up to date.</p>
Review and approval	<p>Does the CAA have to review the entire DPO’s operation?</p>
	<p>Each State must decide its own procedures. Given that States are limited in their resources, CAAs are encouraged to take a System-based oversight approach.</p> <p>When oversight authority allows, there should be a reasonable sampling of DPO Head Office, an assortment of city-centre, suburban and remote shop-front post offices, training personnel, mail sorting centres, international mail both inbound and outbound; and other points of entry such as streetside letter boxes and contracted agents. The collection and sorting process may also be assessed. The finding of common deficiencies within the sampled areas will be sufficient for the DPO to determine whether there is a systemic matter to be fixed or if the CAA has come across a statistical aberration.</p>
Procedures	<p>What are “procedures to control the introduction of DG into the mail”?</p>

	<p>The control of the introduction of dangerous goods into the mail, importantly includes the measures to screen out those dangerous goods not permitted in the airmail, will be an integrated system that comprises:</p> <ul style="list-style-type: none"> a) management responsibility and commitment to only permitting allowable DGs into the airmail system b) proactive steps (information and education to customers of items that cannot be sent, the DPO internal audit or continuous monitoring and improvement processes), c) defensive measures (training, screening, documented and standardized processes) and d) reactive remediation (incident investigation, reporting and trend monitoring). <p>Where a State DPO allows DG to be carried in the surface mail, then it is important that there are measures to prevent the movement of unscreened and potential DG in the surface mail, from being carried in aircraft.</p>
Review and Approval	What sort of facilities should be looked at in the review?
	<p>When a CAA's oversight authority allows, it is best to look at a representative selection of facilities and locations, for example:</p> <ul style="list-style-type: none"> a) Head Office personnel with responsibilities towards the DG program (Training, Internal Audit, Quality assurance); b) some post-office shop fronts, (a mix of capital city, suburban and rural); c) mail sorting centres; d) parcel sorting centres; e) inbound and outbound international mail; and f) ground handling operators/airline acceptance points where mail is accepted for carriage on aircraft. <p>At a minimum, the procedures and policies governing these facilities should be included in the CAA's review.</p>
Review & approval	The CAA has never reviewed the DPO before. What is the appropriate process?
	<p>This is likely to be a common occurrence. CAA's may consider approaching this scenario in three distinct phases.</p> <ul style="list-style-type: none"> a) under UPU requirements, the DPO should have a system already in place. During the first phase, the CAA should learn about the DPO and identify gaps in the current structure. This will supplement the DPOs own initial review; b) the second phase is a period of rectification and consolidation, when the DPO can improve their processes in time for a more structured review; and c) the third phase will be the actual review and approval process.
Review and Approval	The CAA has completed the review and there are still a number of areas where the procedures are inadequate. What should be done?
	<p>Even with the safest airline, procedures will never be perfect. There should be continuous improvement. Where the DPO has been making improvements, then the CAA is encouraged to continue to work with them and conduct periodic reviews. As the procedures become more robust, then the CAA will become more comfortable about approving them.</p> <p>While the ICAO TIs do not provide a specific threshold for approval, Part S-1; 3.2.1 of the</p>

	<p>Supplement informs CAAs that, “The aim of the assessment is to ensure the suitability of the procedures established by the designated postal operators that control the introduction of dangerous goods into air transport.”</p> <p>As CAA approval to accept lithium batteries constitutes a new allowance, such approval should be withheld until relevant procedures are completely adequate and suitable.</p>
Review and Approval	How often should the DPO be reviewed by the CAA?
	In the early stages, reviews may need to be conducted on an annual basis. As procedures become more settled and the system for ensuring compliance with the ICAO Technical Instructions becomes more robust, and the DPOs internal audit and compliance monitoring understands the business of screening out DG from the airmail system, then periodic reviews by the CAA can become less frequent. Here again, this is the prerogative of the State CAA and a dependent on their authority and responsibility in conducting DPO oversight.
Review and Approval	The CAA does not employ a Dangerous Goods or Air Cargo Inspector; how can we review the DPO?
	The DPO’s procedures should be reviewed from a systems and holistic perspective. A similar philosophy to the Safety Management Systems or ISO 9001 Quality Assurance can be used. If the State does not employ a DG, air cargo inspector or a CAA employee with responsibilities for addressing requirements on under Annex 18, then existing flight operations, airworthiness, aerodrome and system safety inspectors ought to have sufficient experience in conducting audits and reviews to be able to constructively review the DPOs procedures for excluding/controlling dangerous goods. Where certain dangerous goods are being received and carried, the procedures should be compared against the UPU Parcel Post Manual, http://www.upu.int/nc/en/the-upu/acts/acts-in-four-volumes.html for compliance. Alternatively States may prefer to contract a DG consultant or source a DG trained and experienced operational airline employee. State CAA’s may also refer specific questions to DGP members, whose contact information can be found at: www.icao.int/safety/DangerousGoods/Pages/DGP.aspx .
Review and approval	In the review process, the CAA has identified that there are numerous shortcomings in the DPOs procedures – there are very few procedures that control and prevent DG from being carried in the airmail. Should the CAA prevent airmail from being carried on an aircraft?
	<p>This is a matter that is between the respective CAA and DPO.</p> <p>The initial approach ought to be treated as a learning process for both parties. The DPO may not have been aware of the obligations to control the introduction of DG into the mail. A more important indicator for the CAA is how the DPO management respond to the review findings. If they are not treating it with an appropriate degree of urgency, then it may be appropriate to escalate the matter to the executive management of the DPO. Where DPO management commitment is lacking, then notification to the appropriate State Government Minister and ICAO may be considered.</p> <p>The initial emphasis during the review should be on a no-blame philosophy. Deficiencies being discovered in one State are unlikely to be different from those found in other States and many of the deficiencies will, in part, be attributable to the previous absence of guidance material.</p>

	<p>State CAAs may discover during the review that the DPO has not controlled the entry of DG for many years; a further short period of non-compliance could be tolerated providing that the DPO is rectifying the non-compliance quickly and effectively.</p> <p>As lithium battery transport is a recently adopted allowance by ICAO, the specific CAA approval to transport lithium batteries should be contingent on wholly suitable procedures. This is in contrast to the more gradual and dynamic process described above which CAAs and DPOs may utilize when going through a general approval process, while allowing airmail operations to continue in the interim.</p>
Training	What are the instructor or course developer requirements for a DPO's training program?
	Where States are applying the ICAO Technical Instructions, then the training course will require review and approval by the CAA. Where training is conducted face-to-face then the Instructor must have completed a similar course or a Category 6 course (Acceptance of Dangerous Goods). Where the course is on-line or correspondence, then the person who prepares the material should have completed a similar course or a category 6 acceptance course.
Training	What should a Dangerous goods training course cover?
	<p>The course will need to address the syllabus items that are relevant to the employee; (link to Table 1-6). The training should be relevant to the employees normal work; for example, sorting office staff will not need the same training as a shop-front post office employee who receives parcels from the public.</p> <p>A test to verify understanding must be provided following training. Confirmation that the test has been satisfactorily completed is also required.</p>
Training	What training records are required?
	<p>A record of training must be maintained, which must include:</p> <ol style="list-style-type: none"> The individual's name; The most recent training completion month; A description, copy or reference to the training materials used to meet the training requirements; The name and address of the organization providing the training; and evidence which shows that a test has been completed satisfactorily.
Training	How long must records be kept for?
	Unless State legislation, CAA policy, or the CAA as part of its approval imposes a different requirement, States may require training records to be retained for 36 months.

Training	Do all DPO employees have to be trained in DG?
	<p>Training should be commensurated with the employee duties and whether they are handling air mail which may travel on an aircraft. The DPO may already have different business processes within one sorting facility, where certain employees are assigned to handle mail transported by ground, and a different set of employees are assigned to the air transport function.</p> <p>If the DPO's business processes are sufficiently robust, such that the ground-mail sorting employees do not interact, and will not be assigned to any duties that involve the airmail, and unscreened ground mail cannot cross into the airmail stream, then training may not be required for those ground mail employees.</p>
Training	How often do the DPO employees have to be trained in DG?
	<p>It is anticipated that most States will require training to be completed every two years. If the recurrent training is performed within the three months before the end of the month when their training expires, then they retain the same expiry date +two years.</p> <p>For example: A person is trained on 15 August 2013, their nominal expiry date will be the end of the August in two years' time – i.e. 31 August 2015.</p> <ul style="list-style-type: none"> • If they undertake recertification training on 20 May 2015 (more than 3 months before 31 August 2015) their new expiry date will be 31 May 2017 (End of the month + two years). • If they undertake recertification training on 20 June 2015 (less than three months), their new expiry date will be 31 August 2017 (Original expiry date + two years).
Training	If the DPO only handles mail and not passengers on an aircraft, why must the training course include DG that can be carried by passengers on an aircraft?
	<p>All DG courses include a component relating to the provisions for dangerous goods carried by passengers and crew. A significant proportion of DG incidents on aircraft arise through DG carried on board by passengers. As air travel is more prevalent, everyone involved in the transportation of passengers or cargo is required to undertake a component that relates the DG that may be carried by passengers.</p>
Training	The DPO already trains employees on Security sensitive matters (explosives, ammunition, etc.), but not the safety aspects of DG. Do they have to come up with a new training course that replicates material already covered in Security training?
	<p>CAAs are encouraged to take a pragmatic approach. Security training for cargo that is carried on aircraft is covered by Annex 17; Dangerous Goods is covered by Annex 18. Unless State legislation prevents it, CAAs are encouraged to allow DPOs to generate, or modify existing training, so that both Security and safety aspects are covered by one course.</p>
Training	None of the DPO employees are DG trained – how soon should they have the training completed?

	<p>Whilst the normal requirement is for employees to be trained before they handle things which may travel on an aircraft, CAAs are encouraged to allow a phase-in period of two years. If the DPO trains all their employees in 2013, then there will be minimal DG training in 2014. ICAO would prefer that the training is planned, recurrent and that courses are conducted at regular intervals, in order to embed DG considerations into the DPO processes.</p> <p>For CAA approval specific to the acceptance, handling, and other transport functions related to lithium batteries contained in equipment, required training for all employee categories in Table 1-6 must be completed before lithium batteries may be accepted by the DPO.</p>
Incidents	What sort of procedures should be followed if DG is found in the airmail?
	<ul style="list-style-type: none"> a) remove item from airmail system; b) confirm if item is DG; c) contact sender/recipient to advise them DG found and to educate them; d) allow item to continue by road, be made available for collection or otherwise disposed of (unless State security requirements prevent this); e) enquire into how the DG entered into the postal system for example: <ul style="list-style-type: none"> 1. street box; 2. post office; 3. sent by road service but was mishandled into the airmail; 4. intended recipient provided the sender with shipping instructions; f) maintain register of types of DG being discovered; and g) periodically review the register for trends and undertake corrective measures.
Incidents	What if improperly accepted DG or DG associated with an incident is found in international airmail from a different country?
	<ul style="list-style-type: none"> a) as above; and b) notify the CAA and DPO of where the parcel originated from.
Incidents	What sort of trend monitoring and corrective measures should the DPO be taking
	<ul style="list-style-type: none"> a) examples of trend monitoring would be: <ul style="list-style-type: none"> 1. types of DG being found; 2. geographical locations where (forbidden) DG are being sent from; and 3. geographical locations where DGs are being found in the mail. b) examples of corrective measures would be: <ul style="list-style-type: none"> 1. undertaking a localized or geographic awareness campaign where there is a disproportionate amount of DG originating in the airmail; 2. targeting specific industries/peak bodies/representative organizations regarding specific types of DG that are being found; 3. an employee awareness campaign when it is identified that reports are not being made or received from a business unit; 4. targeted remedial training or notices to staff when identifying a particular branch, business unit or sorting office is not properly preventing DG from

	entering the postal system; and 5. communicating to a foreign DPO when identifying common themes or numerous DG items from that State.
Incidents	When and what sort of incidents, and in what detail should be reported to the CAA
	DPO reporting should be an ongoing condition of CAA approval when permissible. The form and manner of reporting should be the result of the DPO and CAA discussions. Often DPOs will have employees who are responsible for the enforcement of the State postal Regulations and the consigning of a postal article containing DG, and it's carriage on an aircraft, will also be a breach of these postal regulations.

— END —