## ICAO Training on Lithium Batteries

# International Standards for the Safe Transport of Dangerous Goods Annex 18:

 Requires that dangerous goods are carried in accordance with the ICAO Technical Instructions for the Safe Transport of Dangerous Goods by Air (the "Technical Instructions").

# International Standards for the Safe Transport of Dangerous Goods Annex 18:

•States are required by Annex 18 to have inspection and enforcement procedures to ensure that dangerous goods are being carried in compliance with the requirements.

# International Standards for the Safe Transport of Dangerous Goods Annex 18:

•To ensure DG does not put an aircraft and its occupants at risk there are international Standards which each State, under the provisions of the Chicago Convention, are required to introduce into national legislation. This system ensures governmental control over the carriage of dangerous goods by air and gives world-wide harmonization of safety standards.

## DANGEROUS GOODS AIR CARRIER INSPECTIONS

- Air Carrier Manuals specific to Dangerous Goods
  - Comprehensive & Current Manuals are critical to the safe transport of DG at an air carrier
  - Review of the manuals can be a very good first step in the preparation of a dangerous goods inspection of an air carrier

- Air Carrier Training Programmes specific to Dangerous Goods
  - Comprehensive and Current Training Programmes is a key building block to success in an air carrier's promotion of both safety & compliance
  - Review of the Training Programmes and auditing training courses specific to DG is a great way to evaluate the air carriers implementation of their approved training.

- Dangerous Goods Acceptance –
   Passenger Service
  - Clear training and policy in manuals helps keep this potentially complicated subject clear to air carrier staff always short on time
  - With the many dangerous items that passengers bring in their baggage, an air carrier must constantly reinforce the rules

- Dangerous Goods Acceptance Cargo
  - When an air carrier choses to transport DG, the acceptance process is the most critical aspect in ensuring safe transport
  - An air carrier needs current and proper training, policies, & support for its acceptance staff to be successful

- Dangerous Goods Storage Warehouse
  - Even though the storage of DG in the warehouse does not seem that critical, mishandling a DG package could lead to a delay in an incident while it is on board the aircraft in flight
  - Following proper handling and storage procedures in regards to DG in the warehouse is important

- Dangerous Goods Loading Pallets, ULDs, carts/dollies, Aircraft
  - The proper segregation of DG on a pallet, cart/dolly, and an aircraft is very important to the safety while in-flight
  - The proper acceptance and transport of Cargo Aircraft Only (CAO) DG shipments is a critical function to ensure safety is maintained

- Air Carrier Dangerous Goods Training Records
  - An air carriers DG Training Records for all its staff should be organized, accurate, & current.
  - Problems with DG training records could indicate an air carriers lack of support of the implementation of their entire Training Programme

- Air Carrier Offering of Dangerous Goods Company Material (COMAT)
  - For both air carriers that transport and air carriers that do not transport DG, preparing DG COMAT for transport is an important safety function
  - The air carrier should have detailed policies and procedures on the storage, processing and transport of DG COMAT

- Air Carrier Compliance with the Provision of Information
  - Policy, procedures, and training is the key to successful completion of the Part 7, Chapter 4 requirements
  - Items required: Info to Pilot-in-Command,
     Emergency Response Info, reporting of DG accidents, incidents, undeclared, & occurrences, and the retention of documents

#### **Shipper Inspections**

- Annex 18 requires that States have inspection and enforcement programs for all of the entities that transport dangerous goods.
- This would include those that offer dangerous goods for air transportation.
- This authority is sometimes not delegated to the aviation authority.

#### How to identify shippers

- Incidents
- Air Carrier files
- Nature of the business
- Internet
- Customs

# AIR TRANSPORT REGULATION COMPLIANCE CONCERNS

#### Lithium Battery Air Transport Regulation Compliance Concerns

- Packages misdeclared as Section II (PI-965 or 968) when they are really Section IA or Section IB lithium battery packages
- It is difficult or impossible to determine if a shipment is misdelcared by the outside of the package alone

#### Lithium Battery Air Transport Regulation Compliance Concerns

- Two (2) types of packages are most common:
  - 1) A package with lithium ion cells larger than 20 Wh, lithium ion batteries larger than 100 Wh, lithium metal cells larger than 1 g, or lithium metal batteries larger than 2 g

#### Incident Example

 Package was labeled as PI-965 Section II.

(The phone number was present on the label, but has been obscured)



#### Incident Example

Package contained
 2 batteries with a
 Watt-hour rating of
 462.5 Wh each (well
 over the 100 Wh
 limit of Section II).



#### Lithium Battery Air Transport Regulation Compliance Concerns

- Two (2) types of packages are most common:
  - 2) A package with more than 8 lithium ion cells equal to or less than 20 Wh, more than 2 lithium ion batteries equal to are less than 100 Wh, more than 8 lithium metal cells equal to or less than 1 g, or more than 2 lithium metal batteries equal to or less than 2 g

#### Lithium Battery Air Transport Regulation Compliance Concerns

- Falsification of the required proof that the lithium cell or battery is in conformance with requirements of each test in the UN Manual of Tests and Criteria, Part III, Section 38.3
- Difficult to determine unless a full test report is obtained on the cell or battery

#### REFERENCES

IATA Battery Guidance Document

https://www.iata.org/whatwedo/cargo/dgr/Documents/lithium-battery-guidance-document-2015-en.pdf

DHL Lithium Battery Interactive Tool

http://www.dhl.com/content/dam/downloads/g0/express/shipping/lithium\_batteries/lithium\_batteries\_interactive\_tool.pdf

#### Summary

- Dangerous Goods Air Carrier Inspections
- Lithium Battery Air Transport Regulation Compliance Concerns

#### QUESTIONS?