



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-SEVENTH MEETING

Montréal, 16 to 20 September 2019

Agenda Item 3: Managing safety risks posed by the carriage of lithium batteries by air

3.3: Consider the need for amendments to address impact from proposed amendment to Annex 6, Volume I on cargo compartment safety (Ref: Job Cards DGP.003.02 and FLTOPSP.043)

SAFETY RISK ASSESSMENTS

(Presented by D. Brennan)

SUMMARY

This working paper proposes a revision to the provisions on performance of safety risk assessments in Part 7;1.7 to change the current text from a recommendation to become mandatory as operators will be required to conduct a safety risk assessment associated with the carriage of cargo, mail and baggage, including dangerous goods, by the new Chapter 15 — Cargo Compartment Safety that is being adopted into Annex 6 — *Operation of Aircraft*.

Action by the DGP: The DGP is invited to consider the revisions proposed to Part 7;1.7 as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 At the twenty-fifth meeting of the Dangerous Goods Panel (DGP/25) there was discussion on the position developed by the Flight Operations Panel (FLTOPSP) on the transport of lithium batteries and the need for the operator to perform a safety risk assessment that considered the risks associated with the transport of lithium batteries (see paragraph 5.2 of the DGP/25 Report).

1.2 The meeting agreed that operators needed to carry out appropriate safety risk management activities in order to determine whether they could ensure the safe carriage of lithium batteries and cells. It was noted that the Technical Instructions did not contain any provisions related to an operator's responsibility to conduct safety risk assessments.

1.3 As a consequence of this discussion, the DGP agreed to adopt text into Part 7 that recommended that operators perform a safety risk assessment for the transport of dangerous goods as part of their safety management system. The text adopted also refers to Annex 6 — *Operation of Aircraft* and *Annex 19 — Safety Management* (see paragraph 5.2.7 of the DGP/25 Report).

1.4 In late 2016 the Air Navigation Commission tasked the Flight Operations Panel (FLTOPSP) to evaluate the risks posed by lithium batteries when transported by air, in coordination with DGP and the Airworthiness Panel (AIRP). The result of this was the establishment of the FLTOPSP Cargo Safety Sub Group (FLTOPSCS-SG) tasked with establishing suitable recommendations and guidance for the safe carriage of all cargo, including the carriage of lithium batteries and dangerous goods.

1.5 The work of the FLTOPSCS-SG resulted in the development of new Chapter 15 — Cargo Compartment Safety for Annex 6 as well as associated guidance material proposed for inclusion in a new document (Doc 10102 — *Guidance for Safe Operations of Aeroplane Cargo Compartments*). It is expected that the change to Annex 6 to add Chapter 15 will be adopted by Council later this year with an applicability date of 5 November 2020.

1.6 Paragraph 15.1.1 of Chapter 15 includes the following “The State of the operator shall ensure that the Operator establishes policy and procedures for the transport of items in the cargo compartment which include the conduct of a specific safety risk assessment.”

1.7 As Annex 6, Chapter 15 will make it mandatory for the operator to perform a safety risk assessment to address the carriage of dangerous goods, it is believed that the provisions set out in Part 7;1.7 must be revised to align to this requirement. It is also proposed to revise Part 7;1.7 to include specific reference to Chapter 15 of Annex 6 so that there is a direct link to the requirements of that chapter.

2. ACTION BY THE DGP

2.1 The DGP is invited to consider the changes proposed to Part 7;1.7 as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 7 OF THE TECHNICAL INSTRUCTIONS

Part 7

OPERATOR'S RESPONSIBILITIES

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Chapter 1

ACCEPTANCE PROCEDURES

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1.7 CONDUCTING SAFETY RISK ASSESSMENTS

Operators engaged in commercial air transport operations ~~should~~ **must** include a safety risk assessment process for the transport of dangerous goods as part of their approved safety management system to comply with Annexes 6 — *Operation of Aircraft*, **Chapter 15 — Cargo Compartment Safety** and **Annex 19 — Safety Management**. This safety risk assessment ~~should~~ **must** include appropriate information to result in implementation of safety measures that ensure the safe transport of dangerous goods including lithium batteries and cells as cargo.

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