DANGEROUS GOODS PANEL

Frankfurt, 16 to 20 September 2002

- Agenda Item 3: Resolution, where possible, of the non-recurrent work items identified by the ANC or the panel
 - 3.3: Principles governing the transport of dangerous goods on cargo only aircraft

LOADING OF CAO CONSIGNMENTS

(Presented by the Secretary)

DGP/18-WP/32 and an extract from the report of DGP/18 are presented below for the information of the working group.

DANGEROUS GOODS PANEL

Frankfurt, 16 to 20 September 2002

Agenda Item 2: Development of recommendations for amendments to the Technical Instructions for incorporation in the 2003/2004 edition

LOADING OF CARGO AIRCRAFT ONLY (CAO) CONSIGNMENTS

(Presented by P. Steele)

1. INTRODUCTION

- 1.1 Part 7; 2.4.1 of the Technical Instructions requires in part that certain packages or overpacks bearing the CAO label be loaded in such a manner that a crew member or other authorized person can see and handle them in flight. Many large cargo aircraft have main deck cargo compartments that are certified to Category 'E' requirements, which do not require ready accessibility in flight. Similarly, there are passenger aircraft that have main deck cargo compartments of Category C which are inaccessible in flight, and which, without passengers, can be used to transport CAO consignments. Most of these aircraft have an area between the flight deck and the cargo compartment in which cargo can be loaded and which is generally Class A. Because the Technical Instructions do not specify the classification of a compartment in which DG is to be loaded, operators, to meet accessibility requirements, could load CAO in a compartment that does not have the fume isolation and fire detection and/or suppression systems of a Class C or E compartment.
- 1.2 As a general rule, to meet accessibility requirements for CAO, operators with narrow body aircraft on which access is to be provided, must leave the first pallet/ULD position vacant and reverse the loading orientation of the second container, i.e. opening forward, so a crew member can access the cargo.

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1.3 It is arguable that gaining access to a Class E compartment in an emergency may negate the inherent characteristics of containing fumes within the compartment and/or isolating the ventilating air supply.

2. PROPOSAL

- 2.1 The Panel is invited to consider whether the intent of the Technical Instructions is to preclude carriage of CAO in class E, and, where appropriate, Class C, compartments given that accessibility to the compartment is not a requirement of the Class. The Panel is also invited to consider if the addition of further loading restrictions regarding CAO are required.
- 2.2 The wording of any amendment, if any, needed to the Technical Instructions would be dependent on any decisions taken by the Panel, and would be drafted accordingly.

2. LOADING OF CARGO AIRCRAFT ONLY CONSIGNMENTS (DGP/18-WP/32)

- 2.1 Part 7; 2.4.1 of the Technical Instructions requires in part that certain packages or overpacks bearing the cargo aircraft (CAO) only label be loaded in such a manner that a crew member or other authorized person can see and handle them in flight. Many large cargo aircraft have main deck cargo compartments that are certified to Category 'E' requirements, which do not require ready accessibility in flight. Similarly, there are passenger aircraft that have main deck cargo compartments of Category C which are inaccessible in flight, and which, without passengers, can be used to transport CAO consignments. Most of these aircraft have an area between the flight deck and the cargo compartment in which cargo can be loaded and which is generally Class A. Because the Instructions do not specify the classification of a compartment in which dangerous goods is to be loaded, operators, to meet accessibility requirements, could load CAO consignments in a compartment that does not have the fume isolation and fire detection and/or suppression systems of a Class C or E compartment.
- 2.2 As a general rule, to meet accessibility requirements for CAO consignments, operators with narrow body aircraft, on which access has to be provided, must leave the first pallet/ULD position vacant and

reverse the loading orientation of the second container, i.e. opening forward, so a crew member can gain access to the cargo.

- 2.3 It is arguable that gaining access to a Class E compartment in an emergency may compromise the compartment's ability to contain fumes within the compartment and/or isolate the ventilating air supply. The meeting was invited to review the question of accessibility to class C and E compartments and also whether loading restrictions on cargo aircraft are required.
- 2.4 It was agreed that this was a complex issue. Allowing larger quantities on cargo aircraft was, according to the Foreword of the TI based on the principle of accessibility. On the other hand, some dangerous goods placed inside closed freight containers might be considered to be safer than on an open ULD. It was noted that the provision relating to cargo aircraft had changed little since the early days of the TI whereas aeroplane technology had changed considerably. It was therefore agreed that there was a need to review, in the first instance, the principles on which the present provisions were based. If these had changed, it might then be necessary to review the cargo aircraft provisions themselves.
- 2.5 It was agreed that this was not a task that could be undertaken at this meeting and that it would probably need to be addressed by a small working group. It was therefore agreed to recommend the addition of a new non-recurrent work programme item on this subject and the following recommendation was consequently developed:

Recommendation 3/1 — ADDITION OF A NEW NON-RECURRENT WORK PROGRAMME ITEM

That a new non-recurrent work item be added to the DGP's work programme as follows:

Review of the principles governing the transport of dangerous goods on cargo only aircraft, and, if appropriate, the subsequent development of amendments to the related provisions of the Technical Instructions. - 5 - DGP-WG/02-IP/2

It was cautioned that adding this item did not mean that work on it would automatically be started - this would need specific proposals to be prepared by one or more members.