



**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/17)**

Montreal, 24 to 28 April 2017

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 2019-2020 Edition

2.1: Part 1 — General

REPORT OF THE WORKING GROUP ON TRAINING

(Presented by the Chairman of the Working Group on Reporting)

SUMMARY

This paper presents a summary of the DGP Working Group on Training's review of comments received from States and industry on the proposed new training provisions that were included as advance information in Attachment 4 to the 2017-2018 Edition of the Technical Instructions.

1. INTRODUCTION

1.1 The DGP Working Group on Training met in Ottawa on 18 and 19 April 2017. The purpose of the meeting was to review feedback from States, international organizations and industry which had been provided in response to State letter AN11/2.1-16/91 and to the survey that had been provided on the ICAO public website. The State letter and the survey sought comments on the draft training provisions and guidance material that were included as advance information in Attachment 4 to the 2017-2018 Edition of the Technical Instructions. The State letter also sought comments on the new guidance on competency-based training for State employees involved in the regulation and oversight of dangerous goods contained in the 2017-2018 Edition of the Supplement to the Technical Instructions.

1.2 It should be noted that there were many comments received by ICAO past the deadline established. Nevertheless, the working group was able to complete most of its review on comments related to the proposed provisions in the Technical Instructions. It was not able to complete its review of comments related to the material contained in the Supplement. The outstanding comments will be reviewed through correspondence and a face-to-face meeting tentatively scheduled for July 2017.

2. AMENDMENT 5 TO THE PANS-TRG

2.1 Before beginning the review, the group was presented information from Nicole Barrette-Sabourin, Technical Specialist in Training and Licensing Standards of the ICAO Flight Operations Section. She advised that amendments to the *Procedures for Air Navigation Services — Training* (PANS-TRG, Doc 9868) would result in the need for consequential changes to the new dangerous goods training provisions. The amendments to the PANS-TRG (Amendment 5) will be submitted for Council approval in early May with an applicability date of November 2020. The amendment would not affect work already done by the DGP, but it would result in additional work due to changes in terminology. The main change would be to the terminology used for the existing competency frameworks for State and dangerous goods personnel, which would now be called “task lists”. A “competency framework” complying with the amendment proposal would correspond to the concept of “core competencies” originally described in DGP/25. She noted that the DGP Working Group on Training had discussed core competencies when work on the competency framework for dangerous goods State employees had commenced. Since then, ICAO developed an ICAO competency framework for civil aviation safety inspectors in the *Manual on the Competencies of Civil Aviation Safety Inspectors* (Doc 10070), which was referred to in the Supplement. A competency framework for dangerous goods State employees for inclusion in the Supplement would simply need to be adapted from the model included in Doc 10070. Additional work would be needed to develop a competency framework for personnel to accompany the task list already included in the guidance material contained in Attachment 4 to the Technical Instructions.

2.2 The training group concluded that the focus of the working group meeting in Ottawa would be the review of comments received on the new training provisions, and that work on adapting the provisions to align with Amendment 5 to the PANS-TRG would need to be included as future work. The applicability date for the amendment to the PANS-TRG would need to be taken into account when determining when the consequential changes to the dangerous goods provisions could be incorporated in the Technical Instructions.

3. REVIEW OF COMMENTS FROM STATES AND INDUSTRY

3.1 The working group proceeded with reviewing all comments received from States and industry and considered whether additional action was necessary. The following is a summary of the working group’s review.

3.2 Thirty States responded to the State letter and one hundred and thirteen responses were received from States and industry to the web-based survey. Of the latter, fifty-one were trainers or training providers, eighteen were regulators, twenty were operators, eight were shippers, five were freight forwarders, three were dangerous goods safety advisors or consultants, one was a pilot representative, one was a ground handling agent, and six were from other industry organizations. The DGP Working Group on Training’s review of these comments, and the associated action proposed are provided below.

3.3 Overall impression of the new training provisions, competency framework and guidance material

3.3.1 As shown in the following table, the majority of responses indicated a strongly favourable or favourable impression of the new training provisions.

	Strongly favourable	Favourable	Unfavourable	Strongly unfavourable	Null
State letter	10	16	3	1	0
Web-based survey	22	51	22	15	3

3.3.2 Despite the favourable impressions and support for the initiative, there were some concerns with how competency-based training could be implemented, particularly for small organizations, and the cost to do so. The comments received raised concerns that there was a lack of understanding with respect to the intent of the *current* training provisions. Some comments alluded to new requirements, when in fact the objective of the training provisions had not changed. The goal of the training provisions has always been to ensure that dangerous goods personnel are competent to successfully perform the functions for which they are responsible with respect to the transport of dangerous goods, cargo and passenger baggage. This goal had not changed. In developing the amendments to Part 1;4, there was never any intention to add any new requirements but simply to ensure that the existing ones did not conflict with competency-based training principles. It was evident that many believed that the competency-based training approach would become mandatory, but this was not the intent. The new competency-based training material was simply meant as guidance for one method of achieving the training objectives. It was an approach which didn't preclude other approaches as long as they achieved the same goal. It was evident that this concept would need to be clarified.

3.4 Helpfulness of new guidance material

3.4.1 While there was indication that the guidance material was somewhat helpful, it was clear that more was needed. Guidance needed to be strengthened in the following areas:

- a) Guidance on implementing the new Part 1;4 provisions particularly with respect to the absence of Tables 1-4 and 1-5 (see paragraph 3.5);
- b) guidance on assessment;
- c) instructor responsibilities and competencies;
- d) employer responsibilities and competencies;
- e) regulator responsibilities and competencies;
- f) guidance on requirements for entities without specific functions in the Technical Instructions; and
- g) additional guidance on using the competency framework and matrix tools.

3.4.2 The Training Group agreed that care was needed to avoid developing guidance that was too prescriptive and not flexible enough to allow for different approaches that achieved the same goals. There also needed to be a distinction between guidance specifically aimed at implementing the provisions in Part 1;4 and guidance to support the competency-based training approach.

3.5 Tables 1-4 and 1-5

3.5.1 Comments related to the removal of Tables 1-4 and 1-5 were the most substantive. While the majority of States responding to the State letter believed removing them was appropriate, those who believed they should be retained had strong opinions. The numbers responding to the web-based survey were almost equally divided between those who thought removing them was appropriate and those who thought it was inappropriate, but again those who did not support removing had strong opinions.

	Removing tables is appropriate	Removing tables is inappropriate	Unsure	Null
State letter	19	7	4	0
Web-based survey	39	41	29	4

3.5.2 Those who supported eliminating the tables believed that retaining them went against competency-based training principles and would result in more focused and effective training. Those who opposed eliminating the tables believed this would lead to a lack of standardization internationally and variability among States. While never intended as mandatory, they had become the standard internationally by States and industry and had become the basis for developing training programmes. The categories of personnel listed on the table were referred to on training records. They provided minimum criteria for knowledge of subject matter on which employers could evaluate employees moving from one organization or one job to another. While the concept of a needs analysis and development of focused training was a good one, some believed the huge investment in planning and analysis needed was something some employers were not in a position to do.

3.5.3 This guidance would include specifics on the development and delivery of training in accordance with the Part 1;4 provisions currently contained in Attachment, Chapter 1.

3.6 Assessment

3.6.1 Many commented on the need for more comprehensive guidance on assessment. There needed to be a distinction between assessing through in-house training and assessing through external training organizations. There also needed to be distinction between assessing after a course and assessing during on the job training. Clear guidance on what was meant by continuous assessment and how it could be achieved was needed. A distinction between a regulator's assessment of a training programme and an employer's assessment of its employees needed to be made. It was also questioned whether specific guidance on assessor qualifications for both the employer and the regulator was needed.

3.7 Responsibilities of regulators, employers and instructors

3.7.1 There were many comments on the need to establish qualifications for regulators, employers and instructors with some believing these should be mandated. There were questions as to whether the responsibilities laid out in Chapter 2, paragraph 2.6 of Attachment 4 were realistically achievable and clear, particularly with respect to employers. Entities acting on behalf of the employer and the permitted scope of their responsibilities needed to be addressed. Some questioned whether referring to "employer responsibilities" was appropriate, as the responsibilities listed needed to be performed by experienced course developers and dangerous goods experts. This needed to be made clear.

4. **FUTURE WORK**

4.1 The DGP Working Group on Training will continue to work through correspondence at a face-to-face meeting during the week of 17 July to:

- a) clearly define the objective of training provisions so that States are clear on what training must achieve;
- b) develop guidance on development and delivery of dangerous goods training in accordance with the Part 1;4 provisions currently contained in Attachment 4, Chapter 1;
- c) develop guidance on assessment as described in paragraph 3.6 of this paper;
- d) clarify the intent of continuous assessment;
- e) further clarify the responsibilities and competencies of employers, instructors and regulators;
- f) address entities without specific functions in the Technical Instructions;
- g) develop guidance on implementation and transitional arrangements;
- h) address comments received to State letter AN11/2.1-16/91 on the guidance on competency-based training for State employees involved in the regulation and oversight of dangerous goods material contained in the Supplement to the Technical Instructions; and
- i) align provisions with new PANS-TRG terminology.

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