



Advisory Circular

TCAA-AC-OPS036A
April 2018

SURVEILLANCE OF OPERATORS FOR COMPLIANCE WITH DANGEROUS GOODS TRANSPORTATION REGULATIONS

1.0 PURPOSE

This Advisory Circular provides guidelines to the operator in compliance with Dangerous Goods Regulations.

2.0 REFERENCES

1. Civil Aviation (Aerodromes) Regulations as amended
2. Civil Aviation (Operation of Aircraft) Regulations as amended
3. Civil Aviation (AOC and Administration) Regulations as amended
4. Civil Aviation (Commercial Air Transport Operations by Foreign Air Operator) Regulations as amended
5. ICAO Annex 18 The Safe Transport of Dangerous Goods by Air.
6. ICAO Technical Instructions for the Safe Carriage of Dangerous Goods by Air, Doc 9284
7. Manual of Aerodrome Standards
8. Operators Dangerous Goods Manual

3.0 GENERAL

The operator shall carry out transportation of Dangerous Goods using the following procedures:

- a) Ensure the safe movement and transportation of Dangerous Goods into the aircraft with the objective of preventing accidents that might result from Dangerous Goods;
- b) Ensure the safe storage of Dangerous Goods at the aerodrome premises; and
- c) Ensure the safe handling of Dangerous Goods by all personnel involved in their transportation.

The operator shall ensure that he has in place approved procedures for the handling of Hazardous Materials at the aerodrome.

Due to the current sensitivity of security and insistence on the safety management system, the operator shall ensure that the carriage of dangerous goods is closely supervised.

4.0 General Procedures Governing Hazardous Material



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The operator carrying out the transportation of Dangerous Goods shall have to be satisfied with the following procedures:

- a) Dangerous Goods are carried on board an aircraft only when they meet ICAO and IATA requirements for such carriage in relation to classification, marking and packing.
- b) No Dangerous Goods shall be carried in the aircraft passenger cabin or cockpit except those that have been specifically allowed by the ICAO/Technical Instructions and are within the quantity and conditions specified therein.
- c) At the Terminal Buildings and at the cargo shed, the Dangerous Goods shall be handled only by persons or employees trained and licensed in the handling of such goods.

5.0 Procedures for handling of Dangerous Goods

The operator shall conform to the following while processing the transportation of dangerous goods:

- 5.1 **Packing:** Dangerous goods shall be packed in accordance with the provisions of the ICAO Technical Instructions.
- 5.2 **Labels:** Unless otherwise provided, each package of dangerous goods shall be labeled with the appropriate labels and in accordance with the ICAO Technical Instructions.
- 5.3 **Markings:** Unless otherwise provided, each package of dangerous goods shall be marked with the proper shipping name of its contents as may be specified in those Technical Instructions.
- 5.4 **Shipper's Responsibilities:** Before a person offers any package or over-pack of dangerous goods for transport by air, the designated person shall ensure that the dangerous goods are not forbidden for transport by air and are properly classified, packed, marked, labeled and accompanied by a properly executed dangerous goods transport document, as specified in the Technical Instructions.
- 5.5 **Operator's Responsibilities:** An operator shall not accept dangerous goods to be transported by air:
 - a) Unless the dangerous goods are accompanied by a completed dangerous goods transport document, except where the Technical Instructions indicate that such a document is not required; and
 - b) Until the package, over-pack or freight container containing the dangerous goods has been inspected in accordance with the acceptance procedures contained in the Technical Instructions.
- 5.6 **Provision of Information:** The operator of an aircraft in which dangerous goods are to be carried shall provide the pilot-in-command as early as practicable before departure of the aircraft with written information as specified in the Technical Instructions.



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5.7 **Establishment of Training Programs:** The operator shall ensure Dangerous Goods training programs are established and updated as provided for in the Technical Instructions and the Operators' Dangerous Goods Training Manual.

6.0 Specific Procedures for Storage of Dangerous Goods

The Operator must comply with the following:

6.1 **Procedures** for the safe handling and storage of Dangerous Goods at the aerodrome including the following:

- a) Arrangements for special areas of the aerodrome to be set up for the storage of inflammable liquids (including aviation fuels) and any other Dangerous Goods; and
- b) The method to be followed for the delivery storage, dispensing and handling of Dangerous Goods.

6.2 **A Clear distinction between the roles of Cargo Handling Agents and Aerodrome Operators.** If the Aerodrome operator acts as a cargo handling agent for Dangerous Goods, then procedures need to be established by the aerodrome operator and documented as follows:

- a) Designation of personnel to receive and handle hazardous substances and materials;
- b) Assurance from shippers that cargo classified as Dangerous Goods can be handled safely, including any special handling procedures required for safety;
- c) Designation of special areas at the Aerodrome for storage of Dangerous Goods while pending loading/clearance pending transportation out of the aerodrome; and
- d) The designated officer handling dangerous goods:

i. Stores Dangerous Goods only in a place designated for such a purpose

ii. Ensures that such a place is properly demarcated and has appropriate signage clearly visible.

iii. Ensures that incompatible materials are stored separated from each other by the required distance



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- iv. Ensures that packages with damaged packing have the inner packing still secure and do not pose a risk.
- v. Regularly checks for leakages from containers holding flammable liquid or other liquid dangerous materials.
- vi. Ensures that there are available readily at hand fire fighting cylinders and hoses suitable for extinguishing fire from the specific types of material stored.

7.0 Aerodrome Rescue and Fire Fighting Services

The operator shall ensure that the Aerodrome has approved procedures and roles of Rescue and Fire Fighting Services during the handling of Dangerous Goods.

8.0 Fuel providers

The operator shall ensure that the aerodrome has approved Fuelling Agents who are compliant with the requirements of refuelling aircraft carrying Dangerous Goods



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AC- OPSXXX

CARRIAGE OF DANGEROUS GOODS CHECKLIST

Order/CL No.		Inspector				Type of Operation		Tracking #				
Date Accomplished			NCF/Discrepancies			Operator/Applicant		Activity Code				
			A	B	C	D	E	F				
Flight No:	Location/From:	To:	AC Registration:			AC Type:		Action*				
								S	U	A P	Ac	F
PIC Name and Lic No:		Other Flt Crew Lic No:		SCC :		Other CC:						
Document:				Operator's Representative:								
NCF/Discrepancies code: A=Aircraft; B=Facilities; C=Documents; D=Procedures; E=Programmes; F = Other												
*Action Codes: S=Satisfactory; U = Unsatisfactory; Ap – Approved; Ac= Accepted; F = Follow-up												
Contents of Dangerous Goods Manual												
Procedures, instructions and information contained in Certificate Holder's manual are documented methods for accomplishing a process. Policies contained in the Certificate Holder's Dangerous Goods manual should establish the Certificate Holder's compliance posture. Policies may not be stand-alone statements but may be imbedded within procedures, instructions or information regarding a particular regulatory requirement. The Inspector should review the contents of the manual to answer the following questions to determine whether the Dangerous Goods manual meets the specific requirements for a Dangerous Goods Programme as required by the Regulations and the ICAO Technical Instructions:												
Item								Assessment				



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	YES	NO	N/C	N/A
1. Does the Dangerous Goods Manual Contain:				
(a) General policies for the Dangerous Goods Programme that comply with the specific regulatory requirements of the Regulations and the ICAO Technical instructions?				
(b) Information on the regulatory source for the requirement?				
(c) The duties and responsibilities for personnel who will accomplish the Dangerous Goods Programme?				
(d) Instructions and information for personnel to meet the requirements of the Dangerous Goods Programme?				
(e) Procedures and information to identify packages marked or labelled as containing dangerous goods?				
2. If the Air Carrier carries, stores or handles dangerous goods, does the manual contain procedures and instructions for the carriage, storage or handling of dangerous goods that include the following:				
(a) The proper shipper certification required by the Regulations: for proper packaging, marking, labelling, shipping documents, compatibility of materials, and instructions on the loading, storage and handling?				
(b) Reporting hazardous material incidents?				
(c) The notification of the pilot in command when there are dangerous goods aboard the aircraft?				
3. Does the approved training programme require personnel who perform any duties or have responsibility for handling dangerous articles and magnetized materials to be trained every 12 calendar months on the following:				
(a) The proper packaging?				
(b) The proper marking?				



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(c) The proper labelling and documentation instructions regarding compatibility, loading, storage and handling characteristics?				
4. Does the shipper, agent/operator maintain satisfactory completion records for individuals who are required to receive training on the handling and carriage of dangerous articles and magnetized materials?				
5. Does the shipper's, agent's/operator's manual contain instructions and information that If the Certificate Holder operates in a foreign country where the loading and unloading of aircraft is performed by personnel of the foreign country who do not meet the requirements of Regulation 70 "Carriage of dangerous goods" and Regulation 172 "Initial dangerous goods training" of The Civil Aviation (Operation of Aircraft) Regulations, 2007, that they will be supervised during the loading and unloading by a person qualified in accordance with the Technical Instructions?				
6. Does the custodian of Dangerous Goods Programme comply with the guidance contained in the Technical Instructions with respect to the following:				
(a) Instructions and information that the operators/organizations which do not accept, handle, or store dangerous goods provide procedures and instructions in the operator's manual to ensure that no packages are accepted by the operator contain a hazardous material?				
(b) Instructions and information that the operator/organization who does not accept, handle, or store dangerous goods; provides in their manual, procedures and instructions for reporting damaged packages found to contain, or that are suspected of containing, dangerous goods or dangerous goods are reported (in compliance with Regulation 86 "Dangerous goods incident and accident reports".				
(c) Instructions and information that the DGI is the Authority's point of contact for the operator and is the final approving authority for the operator's training programme?				
(d) Instructions and information about damage-free packages?				
(e) Instructions and information about Authorization of Carriage of dangerous goods or other regulated materials?				
(f) Instructions and information providing specific guidance on the storage of				



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dangerous goods or dangerous goods?				
(g) Instructions and information providing specific guidance on the storage of Class 8 (corrosive) materials?				
(h) Instructions and information providing specific guidance on the storage of Class 7 (radioactive) materials?				
(i) Instructions and information providing specific guidance on the storage of Class 6, Division 6.1 (poisonous) materials?				
(j) Instructions and information providing specific guidance for loading of other regulated materials (ORM) aboard aircraft?				
(k) Procedures for handling damaged packages?				
(l) Procedures for handling radioactive contamination?				
(m) Procedures for handling substances in Class 6, Division 6.2 (infectious substances)?				
(n) Information that includes a list of telephone numbers and addresses of organizations that can provide technical advice on clean-up techniques and precautions to minimize the possibility of injury to employees and the general public?				
(o) If the organization is authorized to handle poisons, does the manual include procedures for handling packages bearing a poison label?				
(p) Instructions and information that the organization's training programme is approved by the Authority (either initial or final)?				
(q) Does the organization's Dangerous Goods Programme comply with the guidance contained in the Technical Instructions?				
CONTROLS				
7. Are controls built into the Dangerous Goods Programme to ensure that -				



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(a) Personnel are able to identify packages marked or labelled as containing dangerous goods?				
(b) The organization's personnel are able to handle occurrences of radioactive contamination, infectious substances, and poisons in accordance with its procedures?				
(c) The procedures for handling dangerous goods are adhered to by personnel?				
(d) Individuals associated with handling cargo and/or dangerous goods report hazardous material related incidents correctly?				
(e) The air carrier's Pilot in Command notification procedures are followed when carrying dangerous goods?				
(f) The air carrier maintains records of the individuals who are properly trained to handle dangerous goods?				
(g) Packages containing hazardous material are inspected to verify that they are not damaged?				
(h) The air carrier's procedures are followed when oxygen generators are shipped?				
(i) Dangerous Goods (including COMAT) are accepted in accordance with the Certificate Holder's procedures?				
(j) Compatibility of materials restrictions are adhered to by personnel?				
8. Does the air carrier have a documented method for assessing the impact of any changes made to the controls (under Item 7) in the Dangerous Goods Programme?				
INTERNAL AUDIT				
9. Does the air carrier's Dangerous Goods Programme include an internal audit of the most important policies, procedures or instructions and information any of the following situations:				
(a) If personnel were unable to identify packages marked or labelled as containing dangerous goods?				



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(b) If company personnel were unable to handle radioactive contamination, infectious substances, and poisons in accordance with their procedures?				
(c) If the procedures for handling of dangerous goods were adhered to by personnel?				
(d) If individuals associated with handling cargo and/or dangerous goods report hazardous material related incidents correctly?				
(e) If the air carrier's Pilot-in-Command notification procedures were not followed when carrying dangerous goods?				
(f) If the air carrier failed to maintain records of the individuals who are properly trained to handle dangerous goods?				
(g) If the packages containing hazardous material were not inspected to verify that they were not damaged?				
(h) If oxygen generators were shipped without following the air carrier's procedures?				
(i) If dangerous goods (including COMAT) were not accepted in accordance with the company's procedures?				
(j) If the compatibility of materials restrictions were not adhered to by personnel?				
10. Does the organization document the internal audit measurement methods and results?				
11. Does the organization that conducts the internal audit measurements have direct access to the person with responsibility for the Dangerous Goods Programme?				
<p>YES = Meets Requirement NO = Does Not Meet Requirements N/C = Not Checked N/A = Not Applicable</p>				

TAB/CL No:

Tracking No.:

Notes: 1. A "NO" or "N/C" response on a checklist must be accompanied by reason or comments.



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Recommendations
Name of Inspector _____ Signature _____ Date _____



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CARRIAGE OF DANGEROUS GOODS: CHECKLIST

Order/CL No.		Inspector				Type of Operation	Tracking #								
Date Accomplished		NCF/Discrepancies				Operator/Applicant	Activity Code								
		<table border="1"> <tr> <td>A</td> <td>B</td> <td>C</td> <td>D</td> <td>E</td> <td>F</td> </tr> </table>				A	B	C	D	E	F				
A	B	C	D	E	F										
Flight No:	Location/From:	To:	AC Registration:			AC Type:	Action								
									S	U	Ap	Ac	F		
PIC Name and Lic No:		Other Flt Crew Lic No:			SCC :	Other CC:									
Document:					Operator's Representative:										
NCF/Discrepancies code: A=Aircraft; B=Facilities; C=Documents; D=Procedures; E=Programmes; F = Other *Action Codes: S=Satisfactory; U = Unsatisfactory; Ap – Approved; Ac= Accepted; F = Follow-up															
Contents of Dangerous Goods Manual															
Procedures, instructions and information contained in Certificate Holder's manual are documented methods for accomplishing a process. Policies contained in the Certificate Holder's Dangerous Goods manual should establish the Certificate Holder's compliance posture. Policies may not be stand-alone statements but may be imbedded within procedures, instructions or information regarding a particular regulatory requirement. The Inspector should review the contents of the manual to answer the following questions to determine whether the Dangerous Goods manual meets the specific requirements for a Dangerous Goods Programme as required by CAA Regulations and the ICAO Technical Instructions:															
Item							Assessment								
							YES	NO	N/C	N/A					
1. Does the Dangerous Goods Manual Contain:															
(a) General policies for the Dangerous Goods Programme that comply with the specific regulatory requirements of CARs and the ICAO Technical instructions?															
(b) Information on the regulatory source for the requirement?															
(c) The duties and responsibilities for personnel who will accomplish the Dangerous Goods Programme?															
(d) Instructions and information for personnel to meet the requirements of the Dangerous Goods Programme?															
(e) Procedures and information to identify packages marked or labelled as containing dangerous goods?															
2. If the Certificate Holder carries, stores or handles dangerous goods, does the manual contain procedures and instructions for the carriage, storage or handling of dangerous goods that include the following:															
(a) The proper shipper certification required by CARs: for proper packaging, marking, labelling, shipping documents, compatibility of materials, and instructions on the loading, storage and handling?															
(b) Reporting hazardous material incidents?															
(c) The notification of the pilot in command when there are dangerous goods aboard the aircraft?															
3. Does the approved training programme require personnel who perform any duties or have responsibility for handling dangerous articles and magnetized materials to be trained every 12 calendar months on the following:															
(a) The proper packaging?															
(b) The proper marking?															
(c) The proper labelling and documentation instructions regarding compatibility, loading, storage and handling characteristics?															
4. Does the Certificate Holder maintain satisfactory completion records for individuals who are required to receive training on the handling and carriage of dangerous articles and magnetized materials?															
YES = Meets Requirement NO = Does Not Meet Requirements N/C = Not Checked N/A = Not Applicable															



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Item	Assessment			
	Y S	N O	N/C	N/A
5. Does the Certificate Holder’s manual contain instructions and information that If the Certificate Holder operates in a foreign country where the loading and unloading of aircraft is performed by personnel of the foreign country who do not meet the requirements of Regulation 70 “Carriage of dangerous goods” and Regulation 172 “Initial dangerous goods training” of The Civil Aviation (Operation of Aircraft) Regulations, 2007, that they will be supervised during the loading and unloading by a person qualified in accordance with the Technical Instructions?				
6. Does the Certificate Holder's Dangerous Goods Programme comply with the guidance contained in the Technical Instructions with respect to the following:				
(a) Instructions and information that the Certificate Holder who does not accept, handle, or store dangerous goods or dangerous goods provides procedures and instructions in the operator's manual to ensure that no packages are accepted by the operator that contain a hazardous material?				
(b) Instructions and information that the Certificate Holder who does not accept, handle, or store dangerous goods or dangerous goods provides in their manual, procedures and instructions for reporting that damaged packages found to contain, or that are suspected of containing, dangerous goods or dangerous goods are reported (in compliance with Regulation 86 “Dangerous goods incident and accident reports” of The Civil Aviation (Air Operator Certification And Administration) Regulations, 2007?				
(c) Instructions and information that the DGI is the CAA’s point of contact for the operator and is the final approving authority for the operator's training programme?				
(d) Instructions and information about damage-free packages?				
(e) Instructions and information about Authorization of Carriage of dangerous goods, dangerous goods, or other regulated materials?				
(f) Instructions and information providing specific guidance on the storage of dangerous goods or dangerous goods?				
(g) Instructions and information providing specific guidance on the storage of Class 8 (corrosive) materials?				
(h) Instructions and information providing specific guidance on the storage of Class 7 (radioactive) materials?				
(i) Instructions and information providing specific guidance on the storage of Class 6, Division 6.1 (poisonous) materials?				
(j) Instructions and information providing specific guidance for loading of other regulated materials (ORM) aboard aircraft?				
(k) Procedures for handling damaged packages?				
(l) Procedures for handling radioactive contamination?				



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(m) Procedures for handling substances in Class 6, Division 6.2 (infectious substances)?				
(n) Information that includes a list of telephone numbers and addresses of organizations that can provide technical advice on clean-up techniques and precautions to minimize the possibility of injury to employees and the general public?				
(o) If the Certificate Holder is authorized to handle poisons, does the manual include procedures for handling packages bearing a poison label?				
(p) Instructions and information that the Certificate Holder's training programme is approved by the CAA (either initial or final)?				
(q) Does the Certificate Holder's Dangerous Goods Programme comply with the guidance contained in the Technical Instructions?				
CONTROLS				
7. Are controls built into the Dangerous Goods Programme to ensure that -				
(a) Personnel are able to identify packages marked or labelled as containing dangerous goods?				
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(c) The procedures for handling dangerous goods are adhered to by personnel?				
(d) Individuals associated with handling cargo and/or dangerous goods report hazardous material related incidents correctly?				
(e) The Certificate Holder's Pilot in Command notification procedures are followed when carrying dangerous goods?				
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8. Does the Certificate Holder have a documented method for assessing the impact of any changes made to the controls (under Item 7) in the Dangerous Goods Programme?				
INTERNAL AUDIT				
9. Does the Certificate Holder's Dangerous Goods Programme include an internal audit of the most important policies, procedures or instructions and information any of the following situations:				

