

## NPA-OPS 17 DANGEROUS GOODS

### COMMENT RESPONSE DOCUMENT

| No | Comm . no | Commentator                               | Summary  | OC Decision   | New text  |
|----|-----------|---|--|---|---|
| 1  | 027       | British Airways General                   | Intention to use ID number where UN number does not exist or cannot be identified will cause confusion.  | Comm No 27<br>ID numbers have been used for approx 15 years by operators but only recently recognised in ICAO Technical Instructions, so should not be confusing for operators.   | No changes to NPA text  |
|    | 002       | Martinair General                         | Making the Technical Instructions directly applicable in JAR-OPS would save NPAs and avoid confusion as to applicability dates – when the TIs become effective as implied in JAR-OPS 1/3.1150(a)(14) or at the JAR-OPS Change effective date as implied in the NPA. TIs could be made directly applicable by a simple x-reference in JAR-OPS 1/3.080, and augmented as necessary with additional requirements. | Comm No 2<br>This was considered when Subpart R developed but thought to be unacceptable. To remove all the detail could lead to different interpretations of the Technical Instructions and there would be no specific "rules".  | No changes to NPA text  |
| 2  | 008       | Britannia Appendix 1 to JAR-OPS 1/3.1015  | New Text for App 1 to 1/3.1015 as subpara (c): <b>An operator shall ensure that every two years recurrent training also includes (1) Dangerous Goods.</b><br>(c) becomes (d) and (d) becomes (e)<br>This will ensure DG is listed in the Trg Prog.   | Comm No 008<br>The new text proposed by this comment was not agreed, since it would <u>only cover cabin crew</u> . Detailed training requirements are already included in Subpart R; they include the recurrent training requirements for all operators staff, together with guidance material. | No changes to NPA text  |
| 3  | 016       | LFV Sweden Appendix 1 to JAR-OPS 1/3.1065 | New Text in Table 1 to Appendix 1 to JAR-OPS 1/3.1065. Add: <b>documentation</b> in bottom box of left column after: 'dangerous goods'.  | Comm No 016<br>The text proposed by this comment is agreed, but not in the words shown. As Table 1 only refers to documents used for  | Table 1 text is amended to show: Notification of special loads including written information to the commander about dangerous goods |

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|    |           |                                       |  | preparation and execution of a flight, it is appropriate only to refer to the written information to the commander.  |  |
| 4  | 003       | Martinair<br>1/3.1185<br><br>1/3.1215 | Delete 1/3.1185(c) and last sentence of 1/3.1195(b) and move them to App 1 to 1/3.1065 Table 1 for consistency.<br><br>The proposed x-reference at the end of 1/3.1215(d) should be deleted as it is not consistent with JAR-OPS practice.   | Comm No 003<br>Changes proposed by this comment are agreed but not for Table 1, since neither of the documents referred to in 1/3.1185 and 1/3.1195 relate to the preparation and execution of a flight.<br><br>Agreed. 1/3.1215(d) to be deleted. | Table 6 text is amended to show: "Dangerous Goods Transport Document "; and "Dangerous Goods Acceptance Checklist" both for 3 months after completion of the flight  |
| 5  | 018       | Transport Canada<br>1/3.1195          | JAR-OPS 1/3.1195. Retention of Acceptance Check List is for 3 months without any indication of when the 3 months starts. Recommend that the proposed additional sentence to subpara (b) be further extended: <i>The Acceptance Check List shall be retained for a minimum period of 3 months after the completion of the flight on which the dangerous goods were carried.</i> | Comm No 018<br>Agreed- but see next column.  | It was originally intended to include this as an addition to 1/3.1195(b). However following other comments on the storage periods for documentation it has been decided to include the requirements in Appendix 1 to 1/3.1065 Table 6 which is more appropriate. |





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|    |                | 1/3.1225   | <i>has accepted that other procedures, with equivalent level of security, might apply; and</i> ” should be <u>downgraded to AMC</u>  | and 3.   |  |
| 10 | 014<br><br>019 | IFALPA<br>AMC OPS<br>1/3.420(e)<br><br>Transport<br>Canada | While recognising the importance of safety services being aware of DG being carried on board an aircraft it is impractical for crews to pass all the information required by AMC OPS 1/3.420(e) to ATS on the R/T. Suggest that a telephone number is passed to ATS to enable them to obtain the information required.<br>The proposal for AMC OPS 1/3.420(e) requires that the information on DG in an emergency is passed to ATS without specifying the source of the information, whereas ICAO TIs specify that the P-I-C should pass the information. By not being P-I-C specific the NPA proposal is a step in the right direction because it is essential that the information is passed regardless of the source. | Comm No 014<br>Not agreed at this time. The comment on allowing a telephone number to be given is pre-empting a change in the next edition of the Technical Instructions, due to come into effect from 1 Jan 2001 (or not later than 1 Jul 2001). None of the changes to JAR-OPS needed for alignment with the next edition of the Technical Instructions have yet been sent to JAA.<br>Comm No 019<br>Not agreed; JAR-OPS 1/3.420(e) places responsibility on the commander; the AMC is only giving guidance material on meeting that responsibility. | No changes to NPA text.<br><br>No changes to NPA text.   |
| 11 | 017            | LFV Sweden<br>IEM OPS<br>1/3.1160(b)(5)                    | An additional change is proposed to IEM OPS 1/3.1160(b)(5):<br><i>3. The dangerous goods which each passenger or crew member can carry are:</i><br><i>a. Alcoholic beverages <b>containing more than 24% but not exceeding 70% alcohol by volume when packed in receptacles of less than 5 litres.</b></i><br>The reason for the proposal is that alcoholic beverages containing not more than 24% alcohol by volume are not subject to any restrictions.  | Comm No 017<br>Agreed.   | Para 3(a) of IEM OPS 1/3.1160 (b)(5) should read:<br>“(a) Alcoholic beverages <b>containing more than 24% but</b> not exceeding 70% alcohol by volume, when packed in receptacles of less than <del>in</del> <b>retail packagings not exceeding 5 litres and with a total not exceeding 5 litres per person.</b> ” |
| 12 | 012            | IFALPA   | Sporting weapons should remain   | Comm No 012  | No changes to NPA text.  |

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|    |           | 3.070         | <p>inaccessible to passengers in flight and the proposal is to align helicopter requirements with those of aeroplanes by amending 3.070 as follows:</p> <p>(1) <del>In helicopters with a maximum approved passenger seating capacity of more than 9 –</del> <b>They are <i>stowed in the helicopter</i></b> in a place which is inaccessible to passengers during flight. <del>In helicopters with a maximum approved passenger seating capacity of 9 or less, sporting weapons may be stowed in the passenger compartment, if no other compartment is available, with the permission of the commander, unless the Authority has determined that compliance is impracticable and has accepted that other procedures might apply;</del> and</p> <p>(2) In the case of ....etc</p> | <p>Not agreed. The NPA-17 proposal was to align 3.070 with 1.070; therefore, making the change suggested in Comm no 012 would not align the helicopter requirements with those for aeroplanes - it would be more restrictive. Whilst weapons should be inaccessible as far as possible, there are occasions when this is not possible. Guidance for such circumstances is given in IEM OPS 3.070.</p>  |                                |
| 13 | 013       | IFALPA 3.1175 | <p>UN specifications are widely used for packaging and should remain in the text of AMC OPS 3.1175 concerned with packaging.</p>  | <p>Comm No 013<br/>Not agreed. The present text of AMC OPS 3.1175 intends to exclude UN specification packaging through the reference to para 3; 1.1.2 of the Technical Instructions. However, due to change of wording in the Instructions direct reference is no longer possible. There are some circumstances when UN specification packaging is not required and this is provided for in JAR-OPS 3.1175; the AMC gives the measures which should then be considered.</p> | <p>No changes to NPA text.</p> |