

**4/2011**

**Applicability: All Aeroplane and Helicopter AOC Holders**

**DANGEROUS GOODS SAFETY OVERSIGHT PROGRAMME**

**1. Introduction**

- 1.1 The International Civil Aviation Organization Technical Instruction for the Safe Transport of Dangerous Goods by Air (ICAO TIs), regulates the transportation by air of items classified as dangerous goods both in Seychelles and internationally.
- 1.2 Annex 18 to the Chicago Convention, *The Safe Transport of Dangerous Goods by Air*, requires States, inter alia, to establish inspection procedures with a view to achieving compliance with its dangerous goods regulations.
- 1.3 The purpose of this DGD is to present to the industry the programme and format of the new Dangerous Goods Safety Oversight System.

**2. Dangerous Goods Annual Safety Oversight Programme**

- 2.1 Following the initial certification of an Operator, where it is ascertained that the Operator is competent to ensure the safe carriage of dangerous goods by air, the aim of the Dangerous Goods Annual Safety Oversight Programme is to confirm that an Operator continues to maintain this level of compliance in regards to Operator Responsibilities (see JAR OPS 1/3 Subpart R) in all aspects of the operation.
- 2.2 Continuing safety oversight of an operator is an obligation under the ICAO Convention by the State of the Operator and is inherent in the system of certification. It is an essential part of the responsibility of a State to ensure that the required standard of operation is maintained in order to provide a safe and reliable commercial air transport service to the public.
- 2.3 Safety oversight is defined as a function by means of which States ensure effective implementation of the safety-related Standards and Recommended Practices (SARPs) and associated procedures contained in the Annexes to the Convention on International Civil Aviation and related ICAO documents through its own regulatory provisions. Safety oversight also ensures that the national aviation industry provides a safety level equal to, or better than, that defined by the SARPs. As such, an individual State's responsibility for safety oversight is the foundation upon which safe global aircraft operations are built. Lack of appropriate safety oversight in one Contracting State therefore in many ways threatens the health of international civil aircraft operation.

- 2.4 The Dangerous Goods Safety Oversight Programme is tailored to each individual Operator and commensurate with the complexity, scale and scope of the operation. The programme of audits and inspections is carried out over a 12-month period based on the expiry of the AOC.
- 2.5 The Programme is planned, recorded and finally transmitted to the Operator on an Annual Dangerous Goods Safety Oversight Programme form ([Appendix 1](#)). It is flexible so that any changes to the Operator's operation that may affect safety can be accommodated.

### **3.0 Components of the Dangerous Goods Safety Oversight Programme**

- 3.0.1 The Annual Dangerous Goods Safety Oversight Programme is made up of a number of individual audit events and inspections (Checks) as follows:

Events: DG-Annual Audit (AA)

Checks: Check DG-MR (Manual Review)  
Check DG-PH (Passenger Handling)  
Check DG-R (Ramp)  
Check DG-C (Consignment)  
Check DG-Tt (Staff Training)  
Check DG-Tp (Training Program)  
Check DG-D (Document)  
Check DG-PI (Package Inspection)

- 3.0.2 The Checks are dependent on whether or not an operator is approved to carry Dangerous Goods.

### **4.0 Events**

#### **4.1 Annual Audit (AA)**

- 4.1.1 The DG-Annual audit (AA) is an audit including inspections (Checks) carried out in depth once a year around three months prior to the expiry of the AOC on an Operator to assess operational safety. It is usually combined with the AOC Annual Audit. The DG-Annual Audit is made up from a selection of the Checks listed in the following paragraphs below.

- 4.1.2 The objective of an audit is to demonstrate that operators have procedures in place, either on their own account and/or through their handling agent(s), to ensure the correct processing and handling of dangerous goods.

### **5.0 Checks**

#### **5.1 Check DG-MR (Manual Review)**

- 5.1.1 A check of the Operations Manual instructions should be made during the organization and procedures inspection referred to above. The Technical Instructions require the Operations Manual or other manuals to contain certain information whether or not operator intends to carry dangerous goods. In addition to this information, the Operations Manual needs to contain sufficient up-to-date guidance material and instructions to enable all those concerned (both ground staff and flight and cabin crew) to meet their responsibilities. The Operations

Manual inspection aims to confirm the information provided is adequate, complete and up to date.

- 5.1.2 When an operator does not intend to carry dangerous goods, the Operations Manual should still be checked to ensure it contains information about the policy of the operator in regards to transport of dangerous goods and instructions about the carriage of passengers with dangerous goods.

## 5.2 Check DG-PH (Passenger Handling)

- 5.2.1 In addition to the common inspection to inspect (training, reference documents, documentation, etc.) the Technical Instructions requires that the operator to provide information for passengers about the types of dangerous goods forbidden from transporting aboard aircraft. This information must consist of notices, warning passengers of the prohibition on dangerous goods in baggage, to be prominently displayed and in sufficient number so that passengers see them during their normal progression through departure procedures.
- 5.2.2 The aim of inspecting these notices is to ascertain that operators are providing such information.
- 5.2.3 The method of inspecting notices is to check those areas in terminals where the operator issues tickets, checks in passengers and assembles them to board an aircraft. The inspection should confirm that notices are at the required places (check-in desks, ticket sales desks and operator maintained aircraft boarding areas). Notices should be conspicuous and in sufficient number so as to be seen by passengers during their normal progression through the check in procedures through to departure.
- 5.2.4 The method of inspecting warning material in or with tickets is to ask to look at passenger's tickets. Passengers must be assured that the inspection concerns operator's responsibilities and in no way directly involves them.

## 5.3 Check DG-R (Ramp)

- 5.3.1 Ramp check take place on or adjacent to an aircraft and, sometimes, also in a warehouse/freight shed prior to loading, with the aim of checking that the operator has prepared for the loading and loaded the aircraft according to the principles of the Technical Instructions, that the training for the crew (both flight and cabin crew, if appropriate) is valid, that all required manuals/staff instructions, etc, are on board and up to-date and that any necessary approvals/exemptions are being carried and the conditions on them have been complied with.
- 5.3.2 A ramp check is aimed at primarily confirming that loading and stowage of dangerous goods meets the requirements of the Technical Instructions.

## 5.4 Check DG-C (Consignment)

- 5.4.1 The aim of checking consignments of dangerous goods is to determine that, as far as can be ascertained from an external check, the packages and their associated documents comply with the requirements. It also aims to determine, as far as possible, that associated documentation (e.g. air waybill, dangerous goods transport document, acceptance checklist, written notification to commander) meets all applicable requirements. Checks are carried out in the operator's or handling

agent's premises and after the dangerous goods have been accepted for transport or whilst they are still in the care of the operator or handling agent.

5.4.2 Both export and import consignments are to be checked, but with the emphasis on export consignments since, if a consignment is found which does not comply with the requirements, action can be taken to prevent it from being loaded on an aircraft and an investigation made into how it was offered for transport and accepted in the state in which it has been found. Import consignments are also to be checked, since although they have been carried by air, the finding of evidence of non-compliance with the requirements needs to be reported to the State where the goods were originally loaded on an aircraft.

#### 5.5 Check DG-Tt (Staff Training)

5.5.1 A staff training check is to confirm that all relevant staff of the operator has been trained and tested, that the training and tests have been to the required standard and undertaken within the required periods.

5.5.2 The check on the training of all those involved, by asking them a selection of question about the recurrence of their training and of what, in general, it consisted. All those involved covers everyone from the flight and cabin crew (where relevant) to the ground handling staff.

5.5.3 Checks are also be made of training records to confirm that the manner of certification of such training shows sufficient details to establish what training has been given to an individual, when it was given and when refresher training will be required.

#### 5.6 Check DG-Tp (Training Program)

5.6.1 The Technical Instructions require that the operator's training programme for all staff be approved. The check is to confirm that training and testing programmes meet the requirements of the Technical Instructions.

5.6.2 An operator, depending on its size, may have several training programmes customized to the individual responsibilities of its staff. Also, even if the operator does not carry dangerous goods, there is still a need for training program for both operational and ground staff dealing with passengers and their baggage; dangerous goods training for such staff may be included, for example, in the safety and emergency procedures training.

5.6.3 Following the approval of the training programmes, periodic inspection are to be made of a selection of the actual training and testing programmes being undertaken to establish that they are in accordance with the objectives and approved syllabus / curriculum.

#### 5.7 Check D (Document)

5.7.1 Where the operator has packages of dangerous goods in his premises, the associated documents are to be checked. Where there are no packages available, a document check only is made.

5.7.2 A sample of consignments that were carried during a specific period is reviewed.

5.7.3 For export consignments, the documents that are inspected include:

- (a) The Air Waybill;
- (b) The Dangerous Goods Transport Document (Shipper's Declaration);
- (c) The Acceptance Check List;
- (d) The "Notice to Captain" or "Notification to Pilot-in-command";
- (e) Other documents relating to a consignment that may assist in assessing it.

5.7.4 The purpose of inspecting the Air Waybill, Dangerous Goods Transport Document and other documents relating to a consignment is to ensure that they have been completed correctly and that, as far as can be ascertained, the correct classification and method of packing was used.

5.7.5 The Acceptance check list is inspected to establish that the operator or handling agent uses a form or other system which allows for completion by the acceptance clerk, either manually or mechanically, and that consignments of dangerous goods were accepted in accordance with the requirements or that any errors were correctly identified.

5.7.6 The "Notice to Captain" or "Notification to Pilot-in-command" (NOTOC) is checked to establish that all the required information was given, that the form was correctly signed and that the loading / stowage requirements were met.

#### 5.8 Check PI (Package Inspection)

5.8.1 A package inspection examines the external appearance of all the packages of dangerous goods currently held by the operator or handling agent, irrespective of whether they are due for transport or have been transported, providing they are still in the operator's or handling agent's custody.

5.9.2 The inspection will check that the marking and labeling requirements have been met, that the type of packaging used is permitted and of the correct specification, for radioactive material packages the radiation level and that the packages are, or would appear to have been, in a fit state for transport.

5.9.3 Package of dangerous goods should only be opened in exceptional circumstances and then only with extreme caution. If a package is to be opened, the potential hazard from the contents needs to be taken into account and care exercised. Any package opened during an inspection must, before being forwarded to the consignee, be restored to its original condition by qualified persons. During the course of their duties, Security Staff may be considering opening packages consigned as cargo. However, packages of dangerous goods should be opened in exceptional circumstances with the assistance of specialist qualified persons.

## 6. Frequency of audits and inspections

6.0.1 The audits and inspections are carried out at the following frequencies:

Audit/Inspection	Frequency
DG-Annual Audit (DG-AA)	Annually
DG-Check MR(Manual Review)	Annually
DG-Check PH (Passenger Handling )	At the level determined by the Authority
DG-Check R (Ramp)	At the level determined by the Authority
DG-Check C (Consignment)	As required
DG-Check Tt(Staff Training)	Annually
DG-Check Tp (Training Program)	At the level determined by the Authority
DG-Check D (Documents)	At the level determined by the Authority
DG-Check PI (Package Inspection)	As required

## 7. Audit/Inspection Findings

### 7.1 General

7.1.1 The objective of an audit is to demonstrate that operators have procedures in place, either on their own account and/or through their handling agent(s), to ensure the correct processing and handling of dangerous goods.

7.1.2 During the audit, if non-conformities are identified, they shall be entered against the applicable requirement in the “Non-conformities” section. Where there is a non-conformity for a requirement that is not shown, it shall be added in the space provided. Observations that are not non-conformities against a requirement or a procedure shall be entered in the “Observations” section.

7.1.3 At the end of the audit, the non-conformities and observations shall be discussed with the operator to ensure that they are understood, together with the necessary action to be taken within the applicable timescales. The inspector and a responsible person of the operator should then sign the form in the spaces provided. The original shall be left with the responsible person, with a copy retained by the inspector.

### 7.2 Finding Levels and Timescales

7.2.1 The following Table presents the finding levels and timescales.

FINDING	DEFINITION	TIMESCALES
Level 1	Any non-compliance with the Technical Instructions, which would lower the standard and probably place the aircraft or personnel in a hazardous situation.	Depending on the extent of the Level 1 finding, consideration should be given to prohibiting the operator from carrying dangerous goods until corrective action has been taken.
Level 2	Any non-compliance with the Technical Instructions, which could lower the standard and possibly place the aircraft or personnel in a hazardous situation.	The corrective action period granted by the National Aviation Authority should be appropriate to the nature of the finding, but initially not more than three months.
Observation	An observation intended to give background information. Level 3 must not include information suggesting non-compliance with the requirements of the Technical Instructions.	No regulatory action is required to be taken in the case of Level 3.

## 8. Response to Safety Oversight Reports

### 8.1 Corrective Action Plans

8.1.1 Operators shall respond to any audit/inspection report in a timely manner by the submission of a Corrective Action Plan (CAP) document within two weeks of any audit/inspection. In view of the severity of Level 1 Findings, any report containing such Finding shall be responded to separately with urgency for the specific Finding.

8.1.2 All Corrective Action Plans and implementation shall be channeled through the Quality Assurance process for verification and validation prior to submitting to the Authority. The Authority expects that the Quality Manager reviews and accepts all root causes to ensure that the planned corrective action will address the issue.

### 8.2 Contents of a Corrective Action Plan

8.2.1 Corrective Action Plans shall be submitted to the Authority in an acceptable format and contain the following elements:

- Audit Report Reference
- Finding Reference
- Finding
- Root cause
- Planned corrective action and target date
- Implemented Action and date

### 8.3 Root Cause Analysis

8.3.1 The root cause analysis is a necessary and fundamental part of an audit process. The objective of the analysis is to analyse the nature of the Finding and examine all possible failures in systems and processes. In many cases it may indicate failures in training, policies, processes, control or quality control that have to be addressed. The Authority will not accept as a general trend, root causes indicating such terms as “oversight”, “mistake”, “error”. The analysis has to run deeper and examine “why”.

8.3.2 The proposed corrective action shall address the root cause and not purely the finding. Operators shall also have a process to ensure that Findings that are repetitive are examined closely in relation to past root cause analysis.

### 8.4 Report Closure

8.4.1 Unless agreed with the Authority in view of the nature of some of the findings and extended anticipated closure period, all audit report shall be closed within a period of 90 days. Should the Authority note a general trend of non-response to audit reports in such a timely manner, the matter will be brought to the attention of the Accountable Manager for immediate attention.

## 10. Queries

10.1 Any queries as a result of this Dangerous Goods Directive should be addressed Dangerous Goods Inspector at the following e-mail address: [agobine@scaa.sc](mailto:agobine@scaa.sc)

## 11. Cancellation

Nil

Mr. Andy Gobine  
**Dangerous Goods Inspector**  
3<sup>rd</sup> May2011

Recipients of new DGNs are asked to ensure that these are copied to their 'in house' or contracted organisations, to relevant outside contractors, and to all members of their staff who could have an interest in the information or who need to take appropriate action in response to this Dangerous Goods Notice.

ANNUAL OVERSIGHT PROGRAMME

Operator:

Schedule for Inspecting Year:

AOC: Version:

General:		Event	Scope
Dec 10			
Jan 11			
Feb 11			
Mar 11			
Apr 11			
May 11			
Jun 11			
Jul 11			
Aug 11			
Sept 11			
Oct 11			
Nov 11			

Event Column Entries

DG-AA	Annual Audit
DG-MR	Check Manual Review
DG-R	Check Ramp
DG-C	Check Consignment
DG-TP	Check Training Program
DG-D	Check Documents
DG-PI	Check Package Inspection

Scope Column Entries

DG-PH	Check Passenger Handling
DG-Tt	Check Staff Training