

OPS 2.1.044	 <b>CAAI</b>	Inspector Handbook
<b>Dangerous Goods Surveillance policy and Program</b>		Revision 0
		05 MAR 2019

## 1. Objective

- 1.1. This directive details the CAAI's program for the surveillance of an Air Operator's Dangerous Goods program - by referral to existing surveillance Directives – through the following Surveillance actions:
  - 1.1.1. DG inspections in the framework of Base inspections
  - 1.1.2. DG inspections in the framework of Station inspections
  - 1.1.3. DG inspections in the framework of Ramp inspections.
- 1.2. This Directive further details the CAAs policy and procedures for surveillance and enforcement of shippers / freight forwarders that have been found to consistently fail to comply with Dangerous Goods Regulations.

## 2. General

- 2.1. **Regulatory requirements:**
  - ICAO requirements**
- 2.2. Annex 18 to the Chicago Convention (*The Safe Transport of Dangerous Goods by Air*) requires that the CAAI, inter alia, establish inspection procedures with a view to achieving compliance with its dangerous goods regulations. ICAO DOC SU-9284 (Supplement to the technical Instructions for the safe Transport of Dangerous Goods – **hereinafter: TI Supplement**) specifies the following fields to be inspected:
  - 2.2.1. Organization and Procedures;
  - 2.2.2. Consignment Inspection;
  - 2.2.3. Operations Manual and other staff instructions;
  - 2.2.4. Staff Training;
  - 2.2.5. Training Programs;

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- 2.2.6. Passenger Warning Notices.
- 2.2.7. The TI require notices warning passengers of the prohibition of DG in baggage to be prominently and in sufficient number so that passengers see them during their normal progression through departure procedures. Additional required inspection provisions regarding passengers and crew are detailed in chapter 5 of the TI Supplement.
- 2.2.8. According to Article 74 of Air Navigation law, 2011 –
- 2.2.8.1 The consignor of the DG is responsible to ensure that the Dangerous goods shall only be given for transport by air after they have been classified, packed, marked and labeled, and information has been provided in regard thereto to the DG AOC holder. The DG AOC holder may not accept dangerous goods for transport in an aircraft operated by him, unless such dangerous goods comply with all the conditions listed above.
- 2.2.8.2 Chapter 7 of Air Navigation Regulations (Transportation of Dangerous Goods), 1983 lists the obligations of the Shipper / consignor of a consignment of Dangerous Goods. Among other responsibilities, shipper / consignor offering DG for carriage by air must ensure that the DG are allowed for transport by air, and that the DG are properly classified, packed, marked and labeled, and are accompanied by two copies a dangerous goods transport document.
- 2.2.9. Dangerous Goods must be transferred by air only by the holder of an Air Operator Certificate with the

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appropriate authorization (hereinafter - **DG AOC holder**)

- 2.2.9.1 Chapter 8 of Air Navigation Regulations (Transportation of Dangerous Goods), 1983; (Hereinafter – ANR.DG) lists the operator's roles and responsibilities in the transport of Dangerous Goods by air.
- 2.2.9.2 Regulations 241(b)(14), 325, 433 and 451 and section (2)(38) of the fifth appendix of Air Navigation Regulations (Operation of aircraft and Rules of the Air), 1981 (hereinafter – ANR.OPS) require that an operator authorized to carry Dangerous Goods -
- 2.2.9.3 provide procedures and instructions related to dangerous goods transportation in its operations manual, as will enable flight crew and other employees to carry out their responsibilities with regard to the transport of dangerous goods. The DG manual / DG section of the operations manual must be approved by the POI.
- 2.2.9.4 establish and maintain initial and recurrent dangerous goods training programs in accordance with the Technical Instructions. (Part 1;4.1.2 of the Technical Instructions provides that operator's dangerous goods training programs be reviewed and approved by the appropriate authority of the State of the Operator, which is the CAAI).

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2.2.10. According to the following regulations, An operator NOT authorized to carry Dangerous Goods must nevertheless-

2.2.10.1 provide procedures and instructions related to dangerous goods transportation in its operations manual to cover at least the topics listed in section (2)(38) – paragraphs (1)(c-e) of the fifth appendix of Air Navigation Regulations. The DG manual / DG section of the operations manual must be approved by the POI, to ensure that it contains information regarding the operator's policy with regard to dangerous goods, and instructions about the carriage of passengers with dangerous goods.

2.2.10.2 establish and maintain initial and recurrent dangerous goods training programs in accordance with the Technical Instructions with the appropriate scope for operators who do not carry dangerous goods – in accordance with regulations 330 and 451 of ANR.OPS.

(Part 1;4.1.2 of the Technical Instructions provides that operator's dangerous goods training programs be reviewed and approved by the appropriate authority of the State of the Operator, which is the CAAI).

### 2.3. **CAAI Dangerous Goods Surveillance Policy**

2.3.1. **Surveillance of Shippers / Freight Forwarders:** since CAAI surveillance resources and enforcement authority towards shippers and freight forwarders acting on their behalf are very limited, surveillance of shippers / Freight forwarders by the CAAI shall be *intelligence-led*, concentrating on those Shippers / Freight Forwarders

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reported as failing to comply with Dangerous Goods Regulations.

2.3.1.1 Reports of non-compliance by Shippers can stem from the following sources:

2.3.1.1.1. Air Operator / Ground Handling Agents Reports on Undeclared / Misdeclared Dangerous Goods, or other non-compliance with the provisions of the technical instructions found when accepting / loading / unloading cargo;

2.3.1.1.2. Findings of non-compliance by a Shipper / FF resulting from CAAI audits of ground handling Agents as part of an Air Operator's Annual Surveillance program;

2.3.1.1.3. Reports by Foreign Authorities of non-compliance with the TI in consignments shipped by air originating from Israeli-based Shippers / Freight Forwarders.

2.3.2. **Surveillance of Air Operators:** CAAI (Flight Standards Division) has oversight responsibility for an air carrier's DG program. An operator's DG program is contained in its Operations Manual and includes DG training. Flight Standards Division must evaluate all DG programs.

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2.3.2.1 Inspection procedures regarding DG are included in the following directives:

- i. OPS 1.1.012 Conducting Base Inspection;
- ii. OPS 1.1.013 / 2.1.013 Conducting Station Facilities Inspection;
- iii. AW / OPS 2.1.023 Conducting Ramp Inspection

2.4. Dangerous Goods Approvals and Exemptions:

2.4.1. Where specifically provided for in the Technical Instructions, the CAAI may grant an approval provided that in such instances an overall level of safety in transport which is equivalent to the level of safety provided for in the Technical Instructions is achieved.

2.4.2. In instances of extreme urgency, or when other forms of transport are inappropriate, or when full compliance with the Technical Instructions requirements is contrary to public interest – the CAAI may grant an exemption from the provisions of the instructions provided that in such instances every effort is made to achieve an overall level of safety in transport which is at least equivalent to the level of safety provided for in the Technical Instructions.

2.4.3. The process and procedures for granting Approvals and Exemptions are detailed in directive OPS 4.0.007.

### 3. Reference Material & Forms

3.1. Reference Material:

- 3.1.1. Israel Air Navigation Law, 2011 – article 74;
- 3.1.2. Air Navigation Regulations (Transportation of Dangerous Goods), 1983;

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- 3.1.3. Air Navigation regulations (Operation of Aircraft and rules of Flight), 1981:
    - 3.1.3.1 Chapter 12: Regulations 241(b)(14), 325;
    - 3.1.3.2 Chapter 13: Regulations 433 and 451 and section (2)(38) of the fifth appendix;
  - 3.1.4. The Safe Transport of Dangerous Goods by Air (Annex 18 to the Convention on International Civil Aviation), Latest Edition;
  - 3.1.5. Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO Doc. 9284), Latest Edition;
  - 3.1.6. Technical Instructions for the Safe Transport of Dangerous Goods by Air – Supplement (ICAO Doc. 9284 Supplement), Latest Edition;
  - 3.1.7. OPS 1.1.012 Conducting Base Inspection;
  - 3.1.8. OPS 1.1.013 / 2.1.013 Conducting Station Facilities Inspection;
  - 3.1.9. AW / OPS 2.1.023 Conducting Ramp Inspection
  - 3.1.10. OPS 4.0.007 – Dangerous Goods Approval/Exemption Procedure.
- 3.2. Forms:
- 3.2.1. The relevant DG sections of -
    - 3.2.1.1 OPSF 1.1.013 Station facility inspection checklist
    - 3.2.1.2 OPSF 1.1.012 Base inspection checklist
    - 3.2.1.3 F 2.1.023B Ramp Inspection Interior Inspection Job-Aid
    - 3.2.1.4 F 2.1.023C Ramp Inspection exterior Inspection Job-Aid

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## 4. Method

4.1. Dangerous Goods Surveillance of Shippers / Freight forwarders

4.2. Upon receipt of a report of a possible Dangerous Goods non-compliance by a shipper / FF, the Dangerous Goods SME shall undertake one of the following actions:

4.2.1. If the alleged offender falls clearly within the jurisdiction of another government authority, The DG SME shall forward the details of the report to the relevant authority. Such a report will usually be forwarded through the legal advisor of the relevant authority.

Possible examples include *inter alia*:

- The Ministry of Environmental protection – for cases involving Hazardous Materials certificate<sup>1</sup> issued by the MEP;
- The Ministry of Health;
- The Ministry of Communications - for undeclared / misdeclared DG found in mail.

4.2.2. If the alleged offender does not clearly fall under the jurisdiction of another government authority, the DG SME shall undertake steps to investigate the details of the case in accordance with CAAI directive GEN 3.0.202 and take corrective action, if needed.

4.3. Dangerous Goods surveillance of Air Operators DG program

4.3.1. Dangerous Goods Inspections in the context of Station inspection shall cover the following areas out of the 8

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<sup>1</sup> היתר רעלים, בעברית



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inspection areas listed in CAAI Directive OPS 1.1.013 /  
2.1.013:

4.3.1.1 Training – the inspector shall review training records to confirm that –

- (i) all relevant staff assigned to the station by the operator or handling agent have been trained in accordance with their duties;
- (ii) the training has been given within the required periods (24 months).

4.3.1.2 Manuals - The inspection of the station's copy of the operations manual aims to confirm that -

- (i) the information provided is adequate, complete and up-to-date; and
- (ii) That any handling agent has copies of the relevant parts of the manual or other instructions concerning the operator's policies and procedures.

Note: The above still applies for operators that do not intend to carry dangerous goods – the station's copy of the operations manual should still be checked to ensure it contains information about the policy of the operator in regard to DG and instructions about the carriage of passengers with DG.

4.3.1.3 Provisions for passengers - Dangerous goods notices at ticket sales desks, check-in desks and boarding areas (including measures to ensure they are displayed by handling agents) – the inspector shall check those areas in terminals where the operator (or the handling agent) issues tickets, checks-in passengers and assembles them to board an aircraft -

4.3.1.4 Consignment inspections – the inspector shall inspect a consignment in order to determine that

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as far as can be determined from an external check -

- (i) the packages and their associated documents comply with the requirements;
- (ii) as far as possible, that associated documentation (e.g. airway bill, DG transport Document, Acceptance checklist, NOTOC) meets all applicable requirements.

the inspection shall be carried out in the operator's or handling agent's premises, and after the DG have been accepted for transport, or whilst they are still in the care of the operator or handling agent.

Both export and import consignments are to be inspected, 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 a follow-up investigation be made into how it was offered for transport and accepted in the state in which it has been found.

Import consignments can also be checked, since although they have been carried by air, the finding of evidence of noncompliance with the requirements needs to be reported to the state where the goods were originally loaded on an aircraft.

- 4.3.1.5 Dangerous Goods Inspections in the context of Station Inspection shall be conducted using

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checklist OPSF 1.1.013 Station Facilities

Inspection checklist.

4.3.2. Dangerous Goods Inspections in the context of Base inspection shall cover the following CAAI areas listed in CAAI Directive OPS 1.1.012:

4.3.2.1 Training – the inspector shall review training records to confirm that –

- (i) all relevant staff of the operator or handling agent have been trained;
- (ii) the training has been conducted to the required standard (e.g. has been conducted by a trainer meeting the qualifications requirements of the TI); and
- (iii) the training has been given within the required periods (24 months).

Note: The above still applies for operators that do not intend to carry dangerous goods – the relevant staff of such an operator must still be trained to recognize and prevent the introduction of Dangerous goods into Air carriage.

4.3.2.2 Manuals - The inspection of the Base's copy of the operations manual aims to confirm that the information provided is adequate, complete and up-to-date;

Note: The above still applies for operators that do not intend to carry dangerous goods – the base's copy of the operations manual should still be checked to ensure it contains information about the policy of the operator regarding DG and instructions about the carriage of passengers with DG.

4.3.2.3 Dangerous Goods Inspections in the context of Base Inspection shall be conducted using checklist OPSF 1.1.012-1 Base Inspection Checklist

4.3.3. Dangerous Goods Inspections in the context of Ramp inspections are conducted by a combined team of OPS

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and AW inspectors. The following breakdown of DG inspection in the context of ramp inspection is divided according to the responsibilities of each inspector.

4.3.3.1 Manuals (to be verified during the "crewmember" inspection area listed in 2.1.023) - The DG section of a ramp inspection of an aircraft aims to confirm that-

- (i) for consignments for which a dangerous goods transport document is required by the TI, appropriate information is immediately available at all times for the use of emergency response to accidents and incidents involving dangerous goods in air transport. The information must be available to the PIC and can be provided by:
  - a. the ICAO document (emergency Response Guidance for Aircraft incidents involving Dangerous Goods (Doc 9481);
  - b. Any other document which provides appropriate information concerning the Dangerous Goods on board (e.g. NOTOC).
- (ii) The availability of procedures for notification by PIC to Air Traffic Services in the event of an in-flight emergency;

4.3.3.2 Consignment inspections (to be verified during the "Aircraft" inspection area listed in 2.1.023) –

the inspector shall inspect the aircraft cargo compartment and loading/unloading area in order to determine that as far as can be determined from an external check -

- (i) the packages and their associated documents comply with the requirements;
- (ii) as far as possible, that the PIC's NOTOC meets all applicable requirements.
- (iii) correct loading of Dangerous goods (including

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Segregation, Securing and accessibility)

- (iv) Inspections for damage or leakage immediately prior to loading and immediately after unloading;

Both export and import consignments are to be inspected, 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 a follow-up investigation be made into how it was offered for transport and accepted.

Import consignments can also be checked, since although they have been carried by air, the finding of evidence of noncompliance with the requirements needs to be reported to the state where the goods where originally loaded on an aircraft.

- 4.3.3.3 Dangerous Goods Inspections in the context of Ramp Inspection shall be conducted using checklist F 2.1.023B - Ramp Inspection Interior Inspection Job-Aid and F 2.1.023C - Ramp Inspection exterior Inspection Job-Aid.

## 5. Task Outcomes

- 5.1. Discrepancies observed during the inspection should be documented along with any on the spot corrective action taken by the operator. Any recommended corrective actions should also be noted on the report so that the Operations Inspectors will

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have the inspector's views concerning the most effective means of resolving the discrepancies.

- 5.2. After the inspection, all the inspectors who participated must meet and prepare the inspection report together.
- 5.3. The operator must submit a corrective action plan for all the findings that were discovered within 10 working days.
- 5.4. In the corrective action plan the operator must specify realistic due dates for correcting the findings. Critical items must be corrected immediately.
- 5.5. The corrective action plan and the dates must be approved by the lead inspector.
- 5.6. The Operations Inspector will follow up on findings which are to be corrected by the operator's Operations department.