Annex 9

Dangerous Goods (Non-AOC Holders)

Introduction

This annex is an integral part of the <u>CASA Surveillance Manual (CSM),</u> which should be referenced at all times. To allow for more frequent revisions, this annex can be updated independent of the CSM and other annexes. The process of updating this annex requires verification and approval from its owners and sponsors, as well as from Quality Control Point (QCP). An updated version can only be published once CSS has finalised the format, with the latest revision history data included in the revision table.

Revision history

Revisions to this annex are recorded below in order of the most recent first.

Version Nº.	Date	Parts / sections	Details
7.0	September 2023	Section 5 & 6.5.1	Further amendments to the NON-AOC Holders Shipper's surveillance process, including removal of references to Shipper's survey and associated letter. Updated list of DG checklist for use in surveillance and including the addition of new DPO checklist for onsite surveillance of postal authority
6.2	March 2023	Section 4	Removal of the term 'surveys' from the list
			Removal of Survey process and Assessment of the Survey
		Section 5	Remove Flow Chart in 5.3.4
			Added a section on risk-based surveillance regarding DG reports and trends
6.1	July 2021	Section 5	Addition of document references for non-AOC Shippers to assist in the surveillance of these operators
			Additional of Survey process
			Addition of process to create unverified ARNs
			Addition of Assessment of the Survey, and dealing with Nil responses
6.0	August 2020	Section 3	Addition of "DG Shipper Personnel" and "DG Shipper Operations" Systems and associated elements and prompts.
		Section 5	Addition of Section 5 - Surveillance of non-AOC Holders - Shippers of Dangerous Goods (DG).
		Section 6	Addition of Section 6 - Surveillance of non-AOC Holders - Freight Forwarders, Ground Handling Agents or Designated Postal Operators.
5.0	December 2019	Section 2.1	Removal of Health Check mandatory elements
4.0	April 2019	Inclusion of Introduction and Revision history.	These inclusions allow for updates and revisions independent of the CSM and other annexes.
4.0	April 2019	Section 2.1	Removal of recommended Health Check timeframes.

4.0	April 2019	Section 3	Removal of recommended surveillance intervals.
4.0	April 2019	Section 4	Addition of third-party audits.

1   Overview

This Annex provides instructions for conducting surveillance of non-AOC holders oversighted by the Dangerous Goods Inspectorate, including Freight Forwarders, Ground Handling Agents (GHA), designated postal operators (DPO) and shippers of dangerous goods (excluding training organisations), and contains information relating to the following:

- Systems and Elements
- Surveillance Currency Guide
- Information Sources.

Note: For guidelines on conducting surveillance of a Dangerous Goods (DG) training organisation, refer to Annex 15 – Training Organisations (Excluding Flying Training).

2 Systems and Elements: Dangerous Goods Shippers – Non-AOC Holders

The audit technique involves assessing the documented system, comparing it against the actual system processes. The system is assessed for compliance and sampling conducted as appropriate. The assessment of the system and its risks is achieved by a questioning technique using the four attributes (12 components) of the Management System Model (MSM), see CSM Sections 3.3.3 System attributes – Management System Model and Section 3.3.3.1 – Systems attributes (table).

The CASA system description of Dangerous Goods Shippers – non-AOC Holders consists of four systems incorporating ten elements.

Table 1: System and Elements

Systems	Elements
DG Shipper Personnel	Training and Records
DG Shipper Operations	Policy and Procedures
	Data and Documents
	Packaging Standards
Freight Personnel	Personnel Rostering
	Operating Standards
Freight Operations	Tools and Equipment
	Stores and Distribution
	Freight Activity
	Data and Documents

Table 2: DG Shipper Personnel

SYSTEM: DG Shipper Personnel	
ELEMENT: Training and Records	
This element plays a significant role in achieving safe transport of dangerous goods by air. Through this element the Shipper ensures that they have personnel who have appropriate qualifications, certification who are trained to the required standard in accordance with legislative requirements of Part 92 in order to safely conduct the planned task.	
Prompts:	
List of personnel who ship DG	Management of training recurrency
Training records	

Table 3: DG Shipper Operations

SYSTEM: DG Shipper Operations	
ELEMENT: Policy and Procedure	
Policy and procedures are a vital element of the system, required to maintain safe transport of DG by air through the establishment of an appropriate company DG policy and procedures for managing the packing and consignment of dangerous goods, including training.	
Prompts:	
DG Policy	Packing standards and instructions
DG Shipping Procedures	Reference material
Quality assurance	Revision of procedures/standards
ELEMENT: Data and Documents	
This element contains the systems and processes for ensuring the activities of the DG Shipper are conducted and documented correctly in the course of preparing, packing, and presenting shipments of dangerous goods for transport by air.	
Prompts:	
DG transport documentation	Technical information (i.e., Safety Data Sheets)
Other supporting technical documentation	Change control
Appropriate content	
ELEMENT: Packaging Standards	
This element contains the systems, processes, and resources for ensuring regulatory requirements are met regarding the packaging of the dangerous goods for transport by air.	
Prompts:	
Classification of DG	Applicable Packing Instructions
Markings and labels	Appropriate UN Specification or alternative packaging

Table 4: Freight Personnel

SYSTEM: Freight Personnel	
ELEMENT: Personnel Rostering	
This element plays a significant role in achieving safe freight operations. Through this element the authorisation holder ensures that administration and freight handling personnel have appropriate qualifications and certification and operate in accordance with legislative requirements in order to safely conduct the planned task.	
Prompts:	
Roster production	Fatigue management
Position descriptions	
ELEMENT: Operating Standards	
Operating Standards are a vital element of the system required to maintain safe operations through the establishment of an appropriate set of systems (including an appropriate organisational structure) to accommodate induction, supervision, upgrade training (where applicable) and a system for dealing with unacceptable performance.	
Prompts:	
Qualifications	Induction
Structure	Checking
Supervision	Upgrade training
Poor performance aspects	

Table 5: Freight Operations Elements

SYSTEM: Freight Operations	
ELEMENT: Tools and Equipment	
This element contains the systems and processes for ensuring the correct tools and equipment is used in all phases of the movement of dangerous goods from receipt through to dispatch.	
Prompts:	
Serviceable	Appropriate
Sufficient assets	
ELEMENT: Stores and Distribution	
This element contains the systems and processes associated with the storage and distribution of items being prepared for freight forwarding. This includes the acquisition, storage and handling of all items and consumable goods used, kept, loaned, or borrowed in the course of carrying out the distribution of items being forwarded.	
Prompts:	
Regulatory requirements	Purchasing
Purchasing	Receipt
Handling	Quarantine/Rejection
Storage	Traceability
Dispatch/Issue	Purchasing
ELEMENT: Freight Activity	
This element contains the systems and processes that account for the actual activity of moving freight internally from receipt until distribution is completed.	
Prompts:	
Floor personnel qualifications	Safe environment
Correct handling of DG	Identification of freight bins
Documented versus actual processes	Access security
ELEMENT: Data and Documents	
This element contains the systems and processes for ensuring the activities of the freight forwarding operation are conducted and documented correctly in the course of carrying out freight operations.	
Prompts:	
Availability/Adequacy (dependent upon planned activities)	Identification
Storage	Currency
Change control	Appropriate content
DAMP documentation	

2.1　Health Check

Health Checks are not conducted on Dangerous Goods Shippers - non-AOC Holders.

3 Surveillance Currency Guide: Dangerous Goods – Non- AOC Holders

Surveillance level	Type	Elements
Level 2	Operational Check	Risks, Specific Elements and Compliance

4   Information Sources

The following is a non-exhaustive list of information sources that can be accessed to support the assessment of an authorisation holder (including the DPO), non-AOC Holder (Freight Forwarders, Ground Handling Agents) or DG Shippers:

- past Surveillance Reports in Sky Sentinel
- third-party audits
- regulatory history, findings (Safety Findings and Safety Observations)
- past Surveillance Reports and findings (Safety Findings and Safety Observations)
- EAP information
- Regulatory Service activity
- information gathered by the authorisation holder, non-AOC Holder, or a DG Shipper
- external information gathered from industry or other government agencies
- Enforcement action
- past accident/incident history
- risk management plans provided by the authorisation holder, non-AOC Holder, or a DG Shipper
- Aircraft Safety Incident Report (ASIR)
- adverse inspection findings
- industry intelligence/complaints
- public intelligence/complaints
- DG inspectors' web inbox.

A portion of this information may be available to the surveillance team and authorisation management team via the Data Warehouse using the Power BI applications.

Note: For advice on where and how to access required information, refer to CSM Chapter on Information Capture and Access.

5 Surveillance of Non-AOC Holders - Dangerous Goods Shippers

ICAO requires surveillance for the oversight of entities, other than AOC holders, who are involved in the transport of dangerous goods by air. This is conducted in addition to the surveillance required under the National Surveillance Selection Process (NSSP).

The following section outlines the surveillance process for non-AOC holders who are Shippers of dangerous goods.

5.1 Who is a Shipper of dangerous goods?

Under regulation 92.085, Shippers are considered 'group F employees' being persons (or deemed employees) who consign dangerous goods, including packing, marking, labelling, and signing the dangerous goods transport document. A person who supervises someone who has group F employee duties are also included in the definition of a Shipper and subject to prescribed training requirements.

5.2 Training requirements for Shippers of dangerous goods

For the purposes of training, a shipper of dangerous goods are considered Group F employees, defined under regulation 92.085:

Shippers, being the person signing the dangerous goods transport document (or otherwise known as the Shippers Declaration of Dangerous Goods (DGD)) are required to be trained to a Group F employee standard prior to offering dangerous goods up for consignment.

The requirements for training of Shippers of dangerous goods (Group F employees) is outlined within regulation 92.120. For further clarification regarding the dangerous goods training period and examples of recurrency training refer to regulation 92.090.

5.3 Surveillance of non-AOC Holders - Shippers of dangerous goods

5.3.1 Overarching Surveillance of Shippers

ICAO require that CASA carry out both regular and random inspections of all entities involved in the transport of dangerous goods by air to confirm compliance with Annex 18, the ICAO Technical Instructions and CASA's dangerous goods regulations in Part 92 of the Civil Aviation Safety Regulations 1998.

Regular inspections of Shippers are planned and scheduled through the surveillance process and conducted as per the CSM manual.

Random inspections are conducted through the collection of dangerous goods paperwork during scheduled surveillance events throughout a 12-month period; see section 5.3.4 for detailed process information.

5.3.2 Surveillance Resources

The following surveillance documentation is published and available through the [Document Catalogue](#)

Document ID:	Document Name:	Description:
CASA-04-4644	[Dangerous Goods Inspection Onsite Inspection Checklist](#)	Onsite compliance checklist used if further surveillance is required

5.3.3 Regular (planned) surveillance of Shippers

Surveillance intervals for planned surveillance are determined by the NSSP. Refer to the NSSP surveillance schedule for further information regarding planned surveillance intervals.

The regular surveillance is conducted per the plan set by the NSSP. The DGI may use the Dangerous Goods Inspection Onsite Inspection Checklist (DOCID: [CASA-04-4644](#)) to conduct this onsite compliance surveillance.

ICAO require that surveillance is conducted on non-AOC related DG shippers regularly and also randomly. The random surveillance is to be conducted as per the process outlined in section 5.3.4 of this Annex.

5.3.4 Random surveillance of Shippers

To manage the random surveillance of shippers, the Dangerous Goods Inspectors will collect transport documents from accepted and rejected shipments during onsite surveillance of air operators for the purpose of compiling a list of Shipper's for upcoming surveillance. Additionally, Shipper information may be identified using a risk-based approach through the dangerous goods reporting system and added to the list.

The following information should be collected as part of the records of shipment from the air operator:

- dangerous goods transport document (Shipper's Declaration of Dangerous Goods); and
- the corresponding completed Acceptance Checklist for the paperwork sampled.

The following details will be required at a later date and need to be gathered at the time of collection. More specifically the Legal Entity Name, complete Address, contact name (Shipper), contact phone number/s and shippers email address. This information will be entered into the Master List - Non-AOC Holders Shipper Surveillance - Dangerous Goods data capture document (RMS Ref: [D20/453006](#)).

Other supporting documents should also be collected (where required), including Safety Data Sheets (SDS), and accompanying technical documents such as Special Form Approvals and Package Design Approval certificates for shipments of Radioactive Material. Preference is to sample paperwork from rejected shipments first, before sampling paperwork from accepted shipments. This is to capture situations where issues have occurred, to review the details of the rejection and have the opportunity to look further at the root causes with the Shipper and/or the associated company offering up the consignment.

Each DG Inspector will collect dangerous goods transport documentation throughout the year during regular surveillance events. The samples will be reviewed by the Dangerous Goods Team Leader and the order of surveillance will be determined during the surveillance planning process. The data collected will be saved to file F20/3680.

5.3.5   Sampled Document Review Period

The review period can be broken down into three phases: preparation, processing/assessment, and on-site surveillance activity.

5.3.6   Preparation

During preparation, the DG Team Leader provides the STO with a list of shippers and associated details that have been selected through the random document sampling using [MASTER LIST Non-AOC Holders Shipper's Surveillance - Dangerous Goods - data capture](#) (RMS Ref: [D20/453006](#)). The STO is then responsible for requesting the creation of the unverified ARN from the Client Service Centre (CSC) for those Shippers who don't have an ARN. See process at 5.3.7.

5.3.7   Creation of unverified ARN for Shippers - EAP and Sky Sentinel

The DG Shippers will require ARNs to be created if it is determined they do not already have one. If an ARN exists update the Master List, if not the STO will request an unverified ARN be created by the CSC (applications@casa.gov.au) use [D20/306415](#) as the basic information required and as supplied by the DG Team Leader. This may be either an organisation ARN or an Individual.

Once an ARN has been created and advised by the CSC, the STO updates the Master List with the ARN. The STO will create the shipper in Sky Sentinel, using the Authorisation type of DG and entering a UID of non-AOC DG Shipper

Note: The Shipper's details in EAP will remain "unverified" as an ID check is not conducted for the creation of the initial ARN.

5.3.8   Surveillance Event

The DGI will arrange with the Shipper an appropriate time to undertake the onsite surveillance activity, ensuring to follow the normal surveillance protocols in place for conducting Level 2 surveillance events. The DGI may use the Dangerous Goods Inspection Onsite Inspection Checklist (DOCID: [CASA-04-4644](#)) to conduct this onsite compliance surveillance.

5.4   Surveillance Report

Upon the completion of the onsite surveillance, the DG Inspector will save the checklist and supporting evidence in the assigned RMS file for the surveillance event and generate a surveillance report and any associated findings in Sky Sentinel as per the normal surveillance protocols.

The report and findings (if applicable) will then follow the CSM process.

5.4.1   Close Out of the surveillance

The DG Inspector will complete and close out the event as per the normal processes documented within the CSM.

6 Surveillance of Non-AOC Holders - Freight Forwarders, Ground Handling Agents or Designated Postal Operators

ICAO requires surveillance for the oversight of entities, other than AOC holders, who are involved in the transport of dangerous goods by air. The following section outlines the surveillance process for non-AOC holders who are Freight Forwarders, Ground Handling Agents (GHA) or a Designated Postal Operator (DPO).

6.1 Who is a Freight Forwarder?

Under regulation 92.015, a freight forwarder means a person who offers the service of arranging the transport of cargo by air.

6.2 Who is a Ground Handling Agent (GHA)?

Under regulation 92.015, a ground handling agent means a person who performs, on behalf of an operator, the service of accepting, handling, loading, unloading, transferring, or otherwise processing cargo, passengers, or baggage.

6.3 Who is a Designated Postal Operator (DPO)?

A Designated Postal Operator (DPO) is an organisation (subject to the review and approval by the civil aviation authority of the State) that controls the introduction of dangerous goods in mail, including the acceptance of mail for transport by air. Australia has one DPO, being Australia Post.

6.4 Training requirements for Freight Forwarders, GHAs and DPOs personnel

For the purposes of training, personnel of Freight Forwarders, GHAs and DPOs are required by Subpart 92.C to undertake dangerous goods training relative to the duties and functions performed. These personnel are generally considered either employees of Group A, B or E as defined within regulation 92.085 (or employees who undertake a combination of such duties).

Note: On occasion, Freight Forwarders may also offer a dangerous goods packing and shipping service which would include the duties and functions of a Group F employee - Shippers of dangerous goods. Refer to Chapter 5 of this Annex for the Surveillance of non-AOC Holders - Shippers.

6.5 Overarching Surveillance of Freight Forwarders, GHAs and DPOs

ICAO require that CASA carry out both regular and random inspections of all entities (except air operators) involved in the transport of dangerous goods by air to confirm compliance with Annex 18, the ICAO Technical Instructions and CASA's dangerous goods regulations in Part 92 of the Civil Aviation Safety Regulations 1998.

Regular (planned) surveillance of Freight Forwarders, GHAs and DPOs is conducted as part of the scheduled events through the NSSP. Random surveillance of Freight Forwarders and GHAs can be triggered by a range of mechanisms, such as foreign ramp inspections, DG incidents, safety data trending and industry reports etc. or if an Inspector is presented with the opportunity to conduct unannounced surveillance.

Random surveillance of the DPO can be triggered by DG incidents, safety data trending, reports, post office inspections etc. or if an Inspector is presented with the opportunity to conduct unannounced surveillance.

6.5.1   Surveillance Resources

The following surveillance documentation is published and available through the [Document Catalogue](#):

Document ID:	Document Name:	Description:
CASA-04-0636	Form 1444 - Acceptance of dangerous goods	Checklist for the acceptance of dangerous goods used during an onsite inspection during a surveillance event (Part A only).
CASA-04-0243	Form 1443 - Dangerous Goods Manual Checklist – AOC Port Inspection (Part A only)	Checklist used for verifying components of the dangerous goods manual onsite (Part A only).
CASA-04-6567	Checklist (OPS.26) Dangerous goods – RAMP inspection	Checklist used for onsite ramp inspection where dangerous goods are carried.
CASA-04-6320	Checklist (OPS.26) Ground operations - Port inspection	Checklist includes the checks for the acceptance of non-DG cargo (general freight) and is to be used during an onsite inspection during a surveillance event.
CASA-04-6587	Checklist (OPS.26) Designated Postal Operator	Checklist used for the onsite surveillance of a Designated Postal Operator.

6.5.2   Surveillance Activity

6.5.2.1   Onsite Surveillance Activity

The DGI will arrange with the Freight Forwarder, GHA or DPO an appropriate time to undertake the onsite surveillance activity, ensuring to follow the normal surveillance protocols in place for conducting Level 2 surveillance events. The DGI may use the Onsite Inspection Checklists (as listed in section 6.5.1) to conduct this surveillance.

6.5.2.2   Desktop Surveillance Activity

The DGI will advise the Freight Forwarder, GHA or DPO of intent to undertake the desktop surveillance activity, ensuring to follow the normal surveillance protocols in place for

conducting Level 2 surveillance events. The DGI may use the Onsite Inspection Checklists (as listed in section 6.5.1) to conduct this surveillance.

6.6   Surveillance Report

Upon the completion of the surveillance, the DG Inspector will save the checklist and supporting evidence in the assigned RMS file and generate a surveillance report and any associated findings in Sky Sentinel.

The report and findings (if applicable) will be issued as per the normal surveillance policy documented within the CSM.

6.6.1   Close Out of the Surveillance

The DG Inspector will complete and close out the event as per the normal processes documented within the CSM.