

DG Occurrence Case Sharing

危險品事故個案分享



Civil Aviation Department
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1. Common DG occurrences 常見危險品事故

Common DG occurrences

(a) DG wrongly declared as general cargo 錯誤申報危險品為一般貨物

E.g. **Declared/ Cargo description/ Commodity name**

- Generic commodity names (e.g. clothes)
- “Not restricted/ without battery”

Involved DG

- UN3481 lithium ion batteries contained in equipment (Section II of PI967)
- UN3480 lithium ion batteries (Section IA / IB of PI965)

(b) Wrong classification of lithium batteries, and assignment to wrong packing instruction

錯誤分類鋰電池及劃入錯誤包裝說明

E.g. **Declared/ Cargo description/ Commodity name**

- UN3481 lithium ion batteries contained in equipment (Section II of PI967)

Involved DG

- UN3480 lithium ion batteries (Section IA / IB of PI965)

Consequence

Not meeting the proper packing, marking, labelling and declaration requirements

2. Case sharing 個案分享

**(a) DG wrongly declared as
general cargo**
錯誤申報危險品為一般貨物

Case Sharing (1)

Declared/ Cargo description/ Commodity name

- “Courier material// facial mask// facial lotion// lipstick// watch” on AWB

Involved DG

- UN3481 lithium ion batteries contained in equipment (Section II of PI967)

Observations

- **Undeclared DG**
- **Shipper provided lithium battery declaration documents**
- **Package was affixed with battery mark (ELI)** as observed during cargo receipt at warehouse

Cause of occurrence

- Office/operation staff **failed to declare for lithium batteries PI967 during AWB preparation**
- **Discrepancy between AWB and physical cargo was not identified** before offering to CTO

Mitigation

- **Enhance procedures on document cross-checking by designated / supervisory staff**
- **Ensure effective communications** among x-ray screening, warehouse and office/operation staff regarding accurate and consistent cargo information

增加指定人員複檢等程序，以加強詳細查閱貨物文件。
安檢、貨倉及辦公室/運營人員應保持有效溝通，以確保貨物資料準確、完整及一致。

Case Sharing (2)

Declared/ Cargo description/ Commodity name

- “Consolidation as per attached manifest” on AWB
- “Table lamp// speaker// cable// LED lamp// without battery” on cargo manifest

Involved DG

- UN3481 lithium ion batteries contained in equipment (Section II of PI967)

Observations

- **Undeclared DG**
- **Shipper provided lithium battery information (e.g. MSDS)**
- **Package was affixed with battery mark (ELI)** as observed during cargo receipt at warehouse

Cause of occurrence

- **Customer service used different version of booking form** without battery indication
- Office/operation staff prepared loading plan and AWB based on booking form and **did not check the information provided by shipper and warehouse**

Mitigation

- **Standardise booking form to ensure required information was consistently provided** by shipper
- **Exercise extra vigilance on checking cargo information** provided by shipper

將貨物托運書標準化，以確保付運人提供所需資料的一致性。
在收運貨物時保持警覺，詳細檢查運輸文件和貨物描述。

Case Sharing (3)

Declared/ Cargo description/ Commodity name

- “Garment // pillow // plastic toy doll // belt // jacket // shoes” on AWB

Involved DG

- UN3480 lithium ion batteries (Section IB of PI965)

Observations

- **Undeclared DG**
- **Complete lack of oversight and responsibility by shipper’s agent**

Cause of occurrence

- Agent secured cargo space from airline and **allowed shipper to assume all handling for the consignment**

Mitigation

- Agent was required to undertake corrective actions to **review and implement business model that complies with the air cargo regulations and requirements**
- **Never compromise safety of a consignment for convenience or meeting demands from shippers**

相關貨運代理人被要求重新審視運作模式以確保其符合所有空運貨物的法規。
不要為方便或滿足付運人的要求而犧牲空運貨物的安全。

Case Sharing (4)

Declared/ Cargo description/ Commodity name

- “Clothes // shoes // toning lotion” on AWB

Involved DG

- UN3481 lithium ion batteries contained in / packed with equipment (Section II of PI966 & 967)
- UN3480 lithium ion batteries (Section IB of PI965)

Observations

- **Undeclared DG in e-commerce consignment**
- **Two different version of booking form were submitted by shipper in succession**
- **Packages are packed in a cluttered and disordered manner**

Cause of occurrence

- Office/operations staff **relied on an old version of the shipper’s booking form to prepare for AWB**, which led to not declaring for lithium batteries
- Failure to detect and identify a small piece of spare lithium ion battery within a **package containing many parcels cluttered in a disorderly manner**

Mitigation

- **Apply final cross check of documents with feedback from warehouse operator before proceeding with AWB preparation**
- **Work with shippers to pack their consignments in an orderly manner, in order to facilitate more effective detection of hidden lithium batteries when applying x-ray screening**

貨運代理人在準備空運提單前應運用貨倉回饋的文件作最後核對。
為提升X光檢查對辨認穩含鋰電池的成效，應尋求付運人合作，以整齊有序的方式包裝貨物。

**(b) Wrong classification of lithium
batteries, and assignment to wrong
packing instruction**
錯誤分類鋰電池及劃入錯誤包裝說明

Case Sharing (5)

Declared/ Cargo description/ Commodity name

- “Video light, range finder, lithium ion batteries in compliance with section II of PI967” on AWB
- Package emitted smoke at destination warehouse

Involved DG

- UN3480 lithium ion batteries (Section IA of PI965) [**Cargo Aircraft Only**]

Observations

- **Undeclared DG**
- **Incorrect / incomplete cargo documentation provided for reference** at the time of processing at warehouse

Cause of occurrence

- **Incomplete / inaccurate information** on booking form / shipper’s letter of instruction
- **Insufficient time to review finalised manifest and booking form** before cargo processed at warehouse

Mitigation

- **Improve booking form to facilitate submission of accurate cargo information**
- Enhance procedures for **warehouse operator to process the consignment only after complete and correct documents were received from the office/operation staff**

改善貨物托運書，以助付運人提供準確貨物資料。
貨倉應待收到辦公室操作人員提供完整正確的文件才執行貨物處理程序。

Case Sharing (6)

Declared/ Cargo description/ Commodity name

- “Low value watches, bare board, connector” and “Lithium ion batteries in compliance with Section II of PI967” on AWB

Involved DG

- UN3480 lithium ion batteries (Section IB of PI965) [**Cargo Aircraft Only**]

Observations

- **Undeclared DG** contained in e-commerce shipment, which was described with generic commodities names
- **Wrongly loaded on a passenger and cargo aircraft, potentially jeopardizing the safety of passengers on board**
- **Packages contained numerous individual parcel bags stacked together** during x-ray screening (raising difficulty in obtaining clear X-ray images)

Cause of occurrence

- Staff **failed to check the packing list provided by shipper** which include commodity description of “charging accessories” (充電配件) during cargo document acceptance
- **X-ray screener overlooked the presence of lithium ion batteries**

Mitigation

- Review cargo document (e.g. **invoice, packing list, cargo manifest**) and check for suspicious cargo description. Seek clarification from shipper if only generic commodity names were provided
- Advise to **lay out individual parcels**, instead of placing whole stacks of outer packages into the X-ray machine

在收運電子商貿貨物時，應詳細查閱貨物文件(如**發票, 裝箱單, 貨運艙單**)並檢查貨物描述。如付運人**只提供一般商品名稱**，應主動向其尋求說明。另外，由於包裝件堆疊起來難以於X光檢查中辨認隱藏危險品，**建議對包裝件逐件進行X光檢查**。

3. Detecting hidden lithium batteries

檢查隱藏鋰電池

Detecting hidden lithium batteries

Possible actions or indications

1. **Be aware of suspicious cargo description and alert the consignor** 留意可疑貨物描述並通知托運人: Alert and seek clarification from the freight forwarder or shipper when suspicion is raised.
2. **Effective communications** 有效的溝通: Establish methods to ensure clarifications with the freight forwarder, shipper, x-ray screener and warehouse staff are conducted clearly and effectively.
3. **DG labels and marks** 留意標籤和標記: Exercise extra vigilance on the presence of DG labels and marks affixed on packages during cargo acceptance.

Examples of labelling and marking and their possible indication 標籤和標記的例子及其可能徵兆:



Section IB of PI965 / PI968 (UN3480 / UN3090)
Large volumes of lithium ion / metal batteries or powerbanks
(大量的鋰離子/ 鋰金屬電池或行動電源)



Section IA of PI965 / PI968 (UN3480 / UN3090)
Very high energy lithium ion / metal batteries
(很大能量的鋰離子/ 鋰金屬電池)

4. **Obtain clearer X-ray images** 取得較清晰的 X光影像: For e-commerce shipments, consider to lay out individual parcels, instead of placing whole stacks of outer packages into the X-ray machine.
5. **Open the package** 開箱檢查: Follow up with open-box inspection where necessary.
6. **Proper packing** 整齊有序包裝: Seek cooperation from shippers to pack their consignments in an orderly manner, in order to facilitate more effective detection of hidden lithium batteries when applying x-ray screening
7. **Never compromise safety for meeting demands** 不要為滿足需求而犧牲安全: Do not succumb to time pressure or convenience and allow omission of required steps that help to guard against errors and mistakes.

4. Follow up actions by CAD on undeclared/ mis-declared DG case

民航處對未申報/ 錯誤申報危險品個案的跟進行動

Follow up actions by CAD on undeclared/ mis-declared DG case

Subject shippers and freight forwarders involved in undeclared/ mis-declared DG case will be:

- required to **implement enhanced control and surveillance measures** (e.g. 100% screening by x-ray or hand search) –
 - a) at individual package level on their consignments; or
 - b) if there are multiple parcels contained in a package, they shall be subject to screening parcel by parcelas part of their corrective action plan for the period of time as specified in **DGAC 3/2018 and its Addendum No.1**; and
- subject to **more frequent inspections** by the CAD.

The above measures **does not preclude** the subject shippers and freight forwarders (e.g. shipper's agent, intermediate agent responsible for physical cargo handling and delivery of shipment to airline and issuing carrier's agent) involved **from legal responsibilities/ liabilities**.

On conviction of Cap. 384A of the Laws of Hong Kong, the shipper and/or the freight forwarder may be subject to **a fine of \$250,000 and imprisonment for 2 years**.

民航處將根據危險品通告3/2018及其第一號增編對涉及未申報或錯誤申報危險品事故的付運人和貨運代理人加強管制、監督和巡查。實施管制和監督措施並不免除涉及危險品事故的所有付運人和貨運代理人(如付運人的代理人、負責處理貨物和向航空公司運送貨物的中間代理人 and 航空公司代理人)的法律責任。如違反《危險品(航空托運)(安全)規例》(香港法例第 384A 章)，最高可處罰款 250,000 元及監禁兩年。

5. Reminders to shippers/ freight forwarders

提醒付運人/ 貨運代理人

Reminders to shippers/ freight forwarders

Shippers and freight forwarders must ensure all dangerous goods are **properly classified, packed, marked, labelled and documented** in accordance with the requirements of **ICAO Technical Instructions for the Safe Transport of Dangerous Goods by Air** and **IATA Dangerous Goods Regulations** before they are offered for air transportation.

付運人及貨運代理人須確保所有危險品都已根據國際民航組織的《危險品安全空運技術指令》及國際航空運輸協會的《危險品規例》的要求正確地分類、包裝、標記、標籤及填妥有關文件才可以予空運。

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