

Miscellaneous

No: 1436

ICAO Technical Instructions

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General Exemption E 5185

**Dangerous Goods: Covid-19 Antibody Test Kits Carried in an Aircraft as Mail - UN 3373
Biological Substances, Category B, and UN 3291 Clinical Waste**

1. The Civil Aviation Authority ('the CAA'), pursuant to Part 1, Chapter 1, 1.1.3 of the ICAO Technical Instructions (TI), hereby exempts any UK shipper and agent thereof, any aircraft operator ("the operator") for whom the CAA is the competent authority, of any aircraft flying for the purposes of commercial air transport, together with the pilot in command and any agent thereof, and **Royal Mail Group Plc** from the provisions of the TI specified in paragraph 2 only to the extent necessary to permit the carriage of the dangerous goods specified in paragraph 3 in mail carried by the Royal Mail Group Plc and consigned within the United Kingdom or between the United Kingdom and Guernsey, Jersey or the Isle of Man for the purpose of antibody Covid-19 testing, subject to the conditions paragraph 4.
2. The specific provisions of the TI mentioned in paragraph 1 are:
 - a) Part 1; Chapter 2.3.1 – General prohibition of Dangerous Goods in mail;
 - b) Part 1; Chapter 4.1 – Dangerous Goods training for Social Customers consigning Dangerous Goods;
 - c) Part 4; Chapter 8 – The provisions of Packaging Instruction 622 (PI 622);
 - d) Part 5; The marking, labelling and documenting provisions;
 - e) Part 7; Chapter 1.3 – Requirement for an Acceptance Check;
 - f) Part 7; Chapter 4.1 - Provision of Information to the Pilot-In-Command;
 - g) Part 7; Chapter 4.3 – Provision of Information by the Pilot-In-Command;
 - h) Part 7; Chapter 7.2.1 - The prohibition on the carriage of dangerous goods within an aircraft cabin occupied by passengers or on the flight deck of an aircraft, only to the extent necessary to permit mail bags containing the dangerous goods to be within an aircraft cabin occupied by passengers when the aircraft does not have a cargo or baggage hold; and
 - i) Part 7; Chapter 7.2.8 – The requirement for Unit Load Devices (ULDs) to display an identification tag.
3. The dangerous goods permitted for carriage by this exemption are human blood samples classified as UN 3373, Biological Substance, Category B, n.o.s., together with used or unused retractable lancets classified as UN 3291 Clinical Waste, Unspecified, n.o.s.

4. This Exemption is granted subject to the following conditions:
- a) the permitted dangerous goods shall be packaged into packages ("the packages") by the Social Customer to meet the requirements of Packing Instruction 650 (PI 650) of the TI;
 - b) the secondary packaging, as required PI 622, shall be sufficiently puncture-resistant such that the lancets will not perforate it during carriage or affect its ability to withstand, without leakage, an internal pressure of 95 kPa and shall be of sufficient size that the lancets are easily accommodated without compromising the integrity of the packaging or the ability to obtain a leakproof seal;
 - c) the lancets shall be of a type where the needle is automatically and fully retracted before and after use and shall be sufficiently robust such that they will not break open during carriage;
 - d) the packages are only permitted for the transport of finger-prick blood sample self-collection kits for severe acute respiratory syndrome coronavirus 2 (COVID-19) antibody testing, where the kit is being returned for the purposes of testing the blood sample and where the kit has been distributed under a contract with the Department for Health and Social Care;
 - e) the packages shall be marked with the name and address of the Social Customer (the address may be recorded as the building or house name/number and the postcode);
 - f) all required markings on the packages shall be durable, readily visible, legible and able to withstand open weather exposure without a substantial reduction in effectiveness; and
 - g) the packages are only to be addressed to either:
 - 1) Eurofins County Pathology, Unit 8 Huxley Road, Surrey Research Park, Guildford, Surrey, GU2 7RE; or
 - 2) PURA DIAGNOSTICS Ltd, Unit D5, Churcham Business Park, Gloucester, GL2 8AX.
5. In this exemption:
- a) "Technical Instructions" (TI) means the latest effective edition of the Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284-AN/905), including the Supplement and any Addendum, approved and published by decision of the Council of the International Civil Aviation Organization;
 - b) "n.o.s." means not otherwise specified; and
 - c) "Social Customer" means a person, company or organisation that ships or consigns the permitted dangerous goods using the services of a company of the Royal Mail Group Plc without having entered into a written contract to do so.
6. This exemption is issued to meet the urgent operational needs of a limited duration due to unforeseeable circumstances as a result of the COVID-19 virus.
7. This exemption shall have effect from 23 October 2020 until 22 October 2021, both dates inclusive, unless previously varied, suspended or revoked.

J Hanafin
for the Civil Aviation Authority
23 October 2020

Explanatory Notes:

1. UK and EU legislation requires that dangerous goods be carried in accordance with the ICAO Annex 18 The Safe Transport of Dangerous Goods by Air, amplified by the detailed specifications of the Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284). The carriage of dangerous goods must either comply with the specific requirements applicable to the particular dangerous goods or be carried in accordance with an exemption permitted by that document.
2. This is such an exemption, authorising the carriage of the specified dangerous goods without complying with the specific applicable requirements.
3. Dangerous Goods carried in accordance with this exemption are carried in accordance with the Technical Instructions and thus in accordance with UK legislation.
4. Guidance for the processing of exemptions, including examples of extreme urgency, may be found in the Supplement to the Technical Instructions (Part S-1;1.2 and 1.3).