The outbreak of coronavirus (COVID-19) is creating some questions and concerns from member airlines in several areas, which include:

- Specimens of COVID-19 (SARS-CoV-2) being shipped to laboratories for analysis or confirmation of diagnosis as cargo and potentially in mail;
- Alcohol-based hand sanitizers uplifted in the cabin for use by crew members as operator equipment; and
- Alcohol-based hand sanitizers carried by passengers and crew members in checked and carry-on baggage.

Transport of Specimens of Coronavirus (SARS-CoV-2)

The outbreak of novel coronavirus (SARS-CoV-2) has health officials worldwide on alert to ensure that any suspected cases are isolated and managed according to appropriate national health protocols.

The World Health Organization (WHO) has advised that so far, the transport of specimens to laboratories for analysis is working well, although there have been some delays caused by doubts in the classification of specimens of SARS-CoV-2 as UN 3373, Biological substance, Category B, where there has been an opinion that the specimens should be UN 2814, i.e. Category A.

Based on the experience of shipping specimens of SARS, swine flu, MERS and other similar types of viruses, WHO and national health authorities such as the US Centers for Disease Control (CDC) are advising health authorities to ship specimens of Covid-19 as UN 3373, Biological substance, Category B. To ensure that the global response to suspected cases of Covid-19 is as rapid as possible, it is important that specimens can be transported to laboratories for analysis without delay. Please assist in this response by facilitating the movement of specimens offered as UN 3373 and packed in accordance with PI 650.

The transition of the outbreak of coronavirus into a pandemic and work by many States and entities to conduct research and development into a vaccine against Covid-19 has meant that in addition to the transport of specimens for the purpose of diagnosis or treatment of persons suspected or known to be infected with COVID-19 there is also a need to transport cultures of the novel corona virus (SARS-CoV-2).

The recommendations of the WHO are that while classification of specimens as UN 3373 is appropriate based on the risk in transport, cultures of SARS-CoV-2 should be classified as UN 2814, Infectious substance, affecting humans (SARS-CoV-2). As UN 2814, cultures of SARS-CoV-2 must be packed in UN specification packagings in accordance with Packing Instruction 620, described on a Shipper’s Declaration; are subject to the dangerous goods acceptance check and must be shown on the NOTOC.

Additional WHO guidance (WHO interim guidance for laboratory biosafety related to COVID-19 virus) is available at:

Addition of Alcohol-Based Hand Sanitizer as Dangerous Goods in Operator’s Property

The use of alcohol-based hand sanitizer as an adjunct to washing hands with soap and water is one of the recommendations from the ICAO Council Aviation Recovery Task Force (CART) to provide a safe environment for passengers and crew members and prevent the spread of Covid-19. To address this and to ensure that the risk of infection of crew members and passengers is minimised, many airlines are providing alcohol-based hand sanitizers and alcohol-based cleaning products into the items carried in the galley or installed in aircraft lavatories.

As alcohol-based hand sanitizers and cleaning products are classified as dangerous goods, there was a revision to the 62nd edition of the IATA Dangerous Goods Regulations to the provisions for dangerous goods in operator’s property (DGR 2.5) with the addition of a new paragraph 2.5.1.4. The revised 2.5 is provided below:

2.5 Dangerous Goods in Operator’s Property

2.5.1 Exceptions

The provisions contained in these Regulations do not apply to the articles and substances of 2.5.1.1 through 2.5.1.5.

2.5.1.1 Aircraft Equipment

Articles and substances which would otherwise be classified as dangerous goods but which are required to be aboard the aircraft in accordance with pertinent airworthiness requirements and operating regulations or that are authorized by the State of the operator to meet special requirements.

2.5.1.2 Consumer Goods

Aerosols, alcoholic beverages, perfumes, colognes, liquefied gas lighters and portable electronic devices containing lithium ion or lithium metal cells or batteries provided that the lithium batteries meet the provisions of 2.3.5.8 carried aboard an aircraft by the operator for use or sale on the aircraft during the flight, or series of flights, but excluding non-refillable gas lighters and those lighters liable to leak when exposed to reduced pressure.

2.5.1.3 Carbon Dioxide, Solid (Dry Ice)

Carbon dioxide solid, (dry ice) for use in food and beverage service aboard the aircraft.

2.5.1.4 Hygiene Products

Alcohol-based hand sanitizers and alcohol-based cleaning products carried aboard an aircraft by the operator for use on the aircraft during the flight or series of flights for the purposes for passenger and crew hygiene.

2.5.1.5 Battery-Powered Electronic Equipment

Electronic devices such as electronic flight bags, personal entertainment devices, credit card readers, containing lithium metal or lithium ion cells or batteries and spare lithium batteries for such devices carried aboard an aircraft by the operator for use on the aircraft during the flight or series of flights, provided that the batteries meet the provisions of 2.3.5.8. Spare lithium batteries must be individually protected so as to prevent short circuits when not in use. Conditions for the carriage and use of these electronic devices and for the carriage of spare batteries must be provided in the operations manual and/or other appropriate manuals as will enable flight crew, cabin crew and other employees to carry out the functions for which they are responsible.

2.5.2 Aircraft Spares

2.5.2.1 Unless otherwise authorized by the State of the operator, articles and substances intended as replacements for those referred to in 2.5.1.1 or articles and substances referred to in 2.5.1.1 which have been removed for replacement, must be transported in accordance with the provisions of these Regulations.
2.5.2.2 When consigned by operators, these articles or substances may be carried in containers specially
designed for their transport, provided such containers are capable of meeting at least the requirements for the
packaging specified in these Regulations for the items packed in the containers. All other applicable provisions of
these Regulations apply.

2.5.2.3 Unless otherwise authorized by the State of the operator, articles and substances intended as
replacements for those referred to in 2.5.1.2, 2.5.1.3 and 2.5.1.4 must be transported in accordance with the
provisions of these Regulations.

2.5.2.4 Unless otherwise authorized by the State of the operator, battery-powered devices and spare batteries
intended as replacements for those referred to in 2.5.1.5 must be transported in accordance with the provisions
of these Regulations.

Prior to including alcohol-based hand sanitizer and/or cleaning product to the items carried on board the
aircraft, operator’s should undertake a safety risk assessment to ensure that any additional risks that may be
introduced by carrying such products have been effectively mitigated. The safety risk assessment should
consider at least the following:

- the quantity of hand sanitizer / cleaning product in each container (e.g. bottle) and the number of containers
to be carried on the aircraft;
- the storage location of the hand sanitizer / cleaning product;
- the carriage and storage location of spare quantities, when required;
- the steps to be taken to ensure that the hand sanitizer / cleaning product is kept away from sources of heat
or ignition, such as ovens in the galley area.

Operators should ensure that crew members are provided with information on the carriage of the hand sanitizer
/ cleaning product. For example, that crew members will be advised on the procedures through a bulletin or
other appropriate method.

Carriage of Alcohol-Based Hand Sanitizer in Passenger and Crew
Baggage

Paragraph 2.3.5.1 of the IATA Dangerous Goods Regulations sets out the allowances for passengers and crew
to have in their checked or carry-on baggage medicinal or toiletry articles, which may include articles
containing alcohol as follows:

2.3.5.1 Medicinal or Toiletry Articles and Aerosols in Division 2.2

Non-radioactive medicinal or toiletry articles (including aerosols). The term “medicinal or toiletry articles” is
intended to include such items as hair sprays, perfumes, colognes and medicines containing alcohols. Aerosols
in Division 2.2, with no subsidiary hazard, for sporting or home use.

Note:
The total net quantity of all such articles carried by each passenger or crew member under the provisions of
2.3.5.1 must not exceed 2 kg or 2 L and the net quantity of each single article must not exceed 0.5 kg or 0.5 L.
Release valves on aerosols must be protected by a cap or other suitable means to prevent inadvertent release
of the contents.

Alcohol-based hand sanitizer is acceptable under the provisions of 2.3.5.1, however, it should be noted that
where passengers or crew wish to have the hand sanitizer in their carry-on baggage that the limit of 100 mL or
equivalent per item for liquids and gels in accordance with the aviation security provisions applies.