Novel Coronavirus (COVID-19) Guidance for Operators – Rev. 1, 16 April 2020

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 Aircraft Equipment

The use of alcohol-based hand sanitizer as an adjunct to washing hands with soap and water is one of the recommendations from the WHO to prevent the spread of Covid-19. To ensure that the risk of infection of crew members is minimised, many airlines are looking to add into the items carried in the galley or installed in aircraft lavatories alcohol-based hand sanitizers.

However, alcohol-based hand sanitizers are classified as dangerous goods and are not specifically permitted by the IATA Dangerous Goods Regulations and ICAO Technical Instructions for the Safe Transport of Dangerous goods by Air (Technical Instructions) under the provisions for dangerous goods in operator’s property (DGR 2.5, ICAO Technical Instructions Part 1;2.2).

Airlines that wish to add alcohol-based hand sanitizer to the items carried in galleys or installed in lavatories will need to request authorization from their civil aviation authority (State of the Operator) in accordance with the provision that is set out in Part 1;2.2.1 a) of the ICAO Technical Instructions, which reads as follows:

2.2 EXCEPTIONS FOR DANGEROUS GOODS OF THE OPERATOR

2.2.1 The provisions of these Instructions do not apply to the following:

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

It is recommended that the request for authorization address the following:

• the classification and UN number of the hand sanitizer. For example, UN 1987, Alcohols, n.o.s. (ethyl alcohol mixture), UN 1170, Ethanol solution. However, the safety data sheet from the manufacturer of the hand sanitizer should be checked for the classification;
• the quantity of hand sanitizer in each container and the number of containers to be carried on the aircraft;
• what steps will be taken to ensure that the hand sanitizer is kept away from sources of heat or ignition;
• provision of information to crew members on the carriage of the hand sanitizer. 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.