

No.	Commentator	Document Reference	Comment	Response	Action
1	Falkland Islands Fire & Rescue Service	Various	Inconsistent use of the terms aerodrome and airport.	Within the OTAR the use of the term airport and aerodrome appears. It is dependent on the source reference. For example, the AN(OT)O may use aerodrome, and the ICAO Tis may use airport. The OTAR therefore aligns with these and so the term is not consistent throughout the OTAR.	No action.
2	Dangerous Goods Safety Group UK LTD	92.9 Cargo aircraft	Not in line with ICAO TI definition.	For ease of reference and understanding, noting wording of the ICAO TI's definition of a passenger aircraft, this is combined here. The definition does not exactly match that of the ICAO TIs but the TI's specified difference within the definition in the OTAR between cargo and passenger aircraft match the TIs.	Minor amendment to text.
3	BCAA	92.9 ULD	Definition of ULD (universal Loading Device) requires punctuation (commas).	Accepted.	Text amended.

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4	Dangerous Goods Safety Group UK LTD	92.9 Freight container	Different definition to the TI.	Accepted.	Amendment to Freight container definition text, addition of Fright container (in the case of radioactive material transport) definition and amendment to unit load device definition text.
5	Dangerous Goods Safety Group UK LTD	92.59	Whole text is repeated in 92.103 & 92.103.	This is due to the way the OTAR is structured with sections aimed at particular functions, for easier reference, unlike the ICAO TIs. This section is repeated for Operators, Shippers and DPOs	Amended section titles with functions.
6	BCAA	92.63	In contradiction with Article 112 (d) of the AN(OT)O.	Not accepted. This section is about an Operator providing emergency responders with any details of dangerous goods on board an aircraft following an accident or serious incident. It is not about the subsequent 'reporting' of such an occurrence.	No action.
7	BCAA	92.65 (c)	How will this requirement ever be known by all non-Territory Operators? Possibly through the AIP.	Noted. Possibly, although this is not an ICAO difference. This aligns with the ICAO TIs. All Operators should, through DG training, be aware of this requirement.	No action.

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8	BCAA	92.65 (d)	Time scale for incident/accident reporting (72 hours) differs to that stated in the AN(OT) O (immediately).	Not accepted, this reporting of occurrence situation is being confused with the 92.63 situation of providing immediate information on any dangerous goods carriage on board an aircraft. See no.6.	No action.
9	Dangerous Goods Safety Group UK LTD	92.65 (e)	No comment, highlighted text change to gender neutral.	Accepted.	Text amended.
10	Dangerous Goods Safety Group UK LTD	92.101 (h) ii. (ii)	The should read "packaged".	Accepted.	Text amended.
11	Dangerous Goods Safety Group UK LTD	92.103	Repeated 3 times in this document.	See no. 5.	See no. 5.
12	Dangerous Goods Safety Group UK LTD	92.103 (b)	Is this still the case with the introduction of CBTA? The UK CAA are still waiting to publish their view on this requirement	Yes, where an Overseas Territory Aviation Authority deems it necessary to review and require an amendment of a training and assessment programme they may. This could be, for example, risk based.	No action.
13	Dangerous Goods Safety Group UK LTD	92.103 (b)	Understanding of sentence.	See no. 12.	See no. 12.

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14	BCAA	92.153	Confusing words. Does it imply that each individual within an entity has to keep their own training records for inspection?"	Accepted.	Text amended.
15	Dangerous Goods Safety Group UK LTD	92.155 (d)	No mention of DG that was not accepted by an operator due to an error or omission by the – a copy of the documentation and checklist must also be retained for a minimum period of 3 months.	Partially accepted. Noting that this is a should in the ICAO TIs this is already in the revised OTAC Chapter 3, Section 4.	For clarity revised text in draft OTAC, Chapter 3, Section 4. No change to OTAR.
16	Dangerous Goods Safety Group UK LTD	92.201 (a)	Certain dangerous goods are permitted without approval. Please refer to Note 1 in 2.3 Part 1 Note 1 of the TI.	Not accepted. Certain dangerous goods are permitted without approval. As a requirement document section (a) is about the requirement for an approval of procedures to control the introduction of dangerous goods in the mail. It is not describing what does not require an approval. However, the revised OTAC does contain information to those dangerous goods that are permitted.	No action. Draft OTAC contains this information.
17	Dangerous Goods Safety Group UK LTD	92.201 (b)	This is not specific enough. It needs to clearly state it is just the Section II provisions of packing instructions PI967 and 970.	Accepted.	Text revised.