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August 14, 2017

Transport Canada
TDG Directorate
Ottawa, ON
Canada

RE: Response to Part 12 Transport of Dangerous Goods Regulatory
Changes White Paper.

Dear Sir or Madam:

The Helicopter Association of Canada and its membership agree that the regulatory changes to the Transportation of Dangerous Goods Regulations – Part 12, as outlined and detailed in your current White Paper and its accompanying Annex B, are required to bring these regulations up to date and into alignment with international regulations and practices.

As such, we endorse the changes as put forward and look forward to their implementation, with two reservations.

The first reservation is in the area of Limited Access operations, and the limitation of the transportation of dangerous goods directly from a singular point of departure to one singular point of arrival. There are some

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circumstances in which it is more practical to look at a journey that is composed of multiple destinations along a single flight path. A good illustration of this would be the transport of dangerous goods among multiple mining or oil exploration sites or well heads that are located remotely, but reasonably close to each other. It may be more practical for the rotorcraft to load the items for multiple sites, but deliver them sequentially, without having to return to a distant base for each separate consignment. The aircraft would be loaded at one point of departure, but dangerous goods consignments may need to be delivered to a destination that may be more than one point of arrival away. It is assumed that these points of arrival would be located in areas that meet the definition of remote access.

For example, XYZ Prospecting is servicing 3 remote exploratory drilling sites in one region from a base that is 75 miles from the closest exploration site. All three require equipment to be dropped off at each site, but only sites 1 and 3 require dangerous goods items. It would be more practical to be able to load the dangerous goods for both sites onto a single flight that would then stop at each site sequentially, rather than to fly to Site 1, then Site 2, then back to base and then return to Site 3 with its shipment.

HAC proposes that an operator be able to load and deliver dangerous goods to multiple remote access destinations from a single point of departure given the destinations are all remote access locations, the dangerous goods are only those allowable for transport under Limited Access regulations, and that an equivalent level of safety is maintained.

The second reservation is in the area of equipment required for the operation or safety of the aircraft - specifically, the need for a rotorcraft to carry a dedicated starter battery pack (i.e.: a "StartPac") for reliable engine start up in cold remote regions.

In many cold weather situations, this battery pack may be required to help start the engine during a cold start, or to power the instrumentation while waiting on the ground. This battery assist can also help extend the life of a turbine engine and its maintenance cycle by assisting the turbine to reach a higher engine pressure prior to ignition.

There are two types of starter battery packs currently in use. One type uses sealed Lead Acid batteries, while the other uses Lithium Ion batteries. The batteries are enclosed in the unit, which also provides the monitoring and

charging components, as well as the attached cables and electrical connector. Many operators have classified the Lithium Ion Starter Pack under the description of “UN3481 Lithium ion batteries contained in equipment”, and the sealed Lead Acid version as “UN3171 Battery-powered equipment”.

We have included with this response, pdf files from the Startpac line of portable aviation battery packs as an initial description of these devices.

We would like you to consider including this piece of equipment, along with guidelines for carriage, into the proposed list of equipment required for the operation of the aircraft, along with the fuel pump and spares kit.

We appreciate the opportunity to comment on these proposed Part 12 changes and are available to answer any questions you may have regarding these comments.

Please feel free to contact me at any time. I can be reached at: Fred.Jones@h-a-c.ca or by telephone at: (613) 231-1110.

Best Regards,



Fred Jones BA LLB
President & CEO
Helicopter Association of Canada