DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/26)

Centurion, South Africa, 26 to 30 October 2026

Agenda Item 5: Clarifying State oversight responsibilities in Annex 18 (Ref: Job Card DGP.005.07)

STRENGTHENING STATE SURVEILLANCE OF DANGEROUS GOODS IN RESPONSE TO THE GLOBAL AVIATION SAFETY PLAN 2026–2028

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SUMMARY

The 2026–2028 Edition of the Global Aviation Safety Plan (GASP, Doc 10004) identifies aircraft operations and surveillance obligations (OPS/CE-7), related specifically to dangerous goods, among the five lowest-scoring Priority Protocol Question audit area/critical element combinations globally. In parallel, the ongoing restructuring of Annex 18 through the Dangerous Goods Panel (DGP), including the work undertaken by the DGP working group on Annex 18, is introducing a strengthened framework for State dangerous goods oversight, safety risk management, safety intelligence, resolution of non-compliance, competency and safety promotion.

This information paper highlights the relevance of the proposed restructuring of Annex 18 to the dangerous goods surveillance challenge identified in the GASP and invites the DGP-WG to exchange views on practical approaches to strengthening effective, risk-based and performance-informed State dangerous goods surveillance.

1. INTRODUCTION

1.1 The Global Aviation Safety Plan (GASP, Doc 10004) provides the global strategy for the continuous improvement of aviation safety and identifies global operational safety risks and organizational challenges to be addressed by States, regions and industry.

1.2 In Section 4 of the 2026–2028 GASP, International Civil Aviation Organization (ICAO) identifies organizational challenges affecting States' safety oversight capabilities. Paragraph 4.2.3 a) lists the five lowest-scoring Priority Protocol Question (PPQ) audit area/critical element combinations

globally. Point 5 identifies aircraft operations and surveillance obligations (OPS/CE-7), related specifically to dangerous goods.

1.3 The identification of dangerous goods surveillance within this group is significant. Unlike an isolated technical requirement, CE-7 concerns the State's continuing ability to determine whether regulated entities remain in compliance after licensing, certification, authorization or approval. Effective surveillance is therefore a fundamental component of a sustainable dangerous goods safety oversight system.

1.4 The United Arab Emirates considers that the DGP is well placed to support a proactive response to this global organizational challenge. This should take account of the ongoing restructuring of Annex 18 undertaken through the DGP, including the work of the DGP working group on Annex 18, which is strengthening the regulatory framework for State oversight and management of the safe transport of dangerous goods by air.

1.5 The proposed restructured Annex 18 — *The Safe Transport of Dangerous Goods by Air* introduces or strengthens provisions concerning the responsibilities and competence of the appropriate national authority, State dangerous goods safety risk management, investigation and resolution of safety issues, enforcement, safety promotion and the collection, analysis, sharing and exchange of dangerous goods safety data and safety information. These developments provide an important regulatory foundation for addressing several of the underlying factors that may contribute to weaknesses in the effective implementation of State surveillance obligations.

1.6 The GASP finding therefore provides an opportunity to consider how implementation of the proposed restructured Annex 18, together with associated ICAO guidance material, can be used to strengthen State performance under CE-7 and support more effective, risk-based and performance-informed dangerous goods surveillance.

2. DISCUSSION

2.1 Dangerous goods oversight encompasses a broad and evolving range of activities and entities. Surveillance programmes need to remain capable of identifying non-compliance and emerging risks across operators and other entities involved in the preparation, acceptance, handling and carriage of dangerous goods by air.

2.2 A surveillance programme based primarily on predetermined frequencies may not, by itself, ensure that oversight resources are directed towards the areas of greatest risk. A mature approach should allow surveillance priorities, scope and frequency to be informed by relevant safety and compliance information.

2.3 Such information may include previous surveillance findings, repeat findings, corrective action performance, dangerous goods occurrences, undeclared or misdeclared dangerous goods, changes in key personnel or activities, the nature and complexity of operations, emerging risks and other relevant safety information available to the competent authority.

2.4 The effectiveness of surveillance also depends on qualified and competent technical personnel, standardized inspection methodologies, appropriate records, timely follow-up of findings and a process to verify that corrective actions are effective. These elements support not only completion of

surveillance activities, but the State's ability to demonstrate that surveillance results in sustained compliance and improvement.

2.5 The proposed restructuring of Annex 18 reinforces this approach by establishing a more integrated framework linking State oversight, safety risk management and safety intelligence. Among other things, the proposed provisions require States to enable the appropriate national authority to oversee entities involved in the transport of dangerous goods by air, proactively manage dangerous goods safety, resolve identified safety issues and enforce dangerous goods regulations. They also emphasize the competence of authorities performing dangerous goods functions.

2.6 The proposed provisions further establish processes for the risk-based analysis and investigation of dangerous goods accidents, incidents, undeclared or misdeclared dangerous goods and other safety issues; identification of hazards from collected safety data and safety information; assessment of associated safety risks; and implementation of measures at State level to resolve identified safety issues and manage those risks.

2.7 The proposed dedicated provisions on dangerous goods safety intelligence are also directly relevant to effective surveillance. Mandatory and voluntary reporting, analysis of dangerous goods safety data and safety information, and mechanisms for sharing and exchanging safety information can provide States with a stronger evidence base for determining surveillance priorities, identifying repeat or systemic non-compliance and evaluating whether surveillance interventions are producing the intended safety outcomes.

2.8 The proposed provisions concerning resolution of non-compliance and enforcement, together with the promotion of dangerous goods safety and a positive safety culture throughout the supply chain, further support an oversight model in which surveillance findings are not treated as isolated events but are used to drive corrective action, risk reduction and continuous improvement.

2.9 Taken together, these developments provide a stronger regulatory foundation for risk-based and performance-informed dangerous goods surveillance. They are therefore capable of contributing directly to addressing the organizational challenge identified in paragraph 4.2.3 a) 5) of the GASP. The effectiveness of this contribution will, however, depend on how the new provisions are implemented by States and on the availability of sufficiently practical guidance to translate the Standards into effective surveillance methodologies.

2.10 The forthcoming Manual on Oversight and Management of the Safe Transport of Dangerous Goods by Air provides a potential vehicle for such practical guidance. Consideration could be given to including methodologies and good practices addressing risk-based surveillance planning; criteria for determining surveillance priorities, scope and frequency; inspector competency and standardization; use of occurrence, compliance and other safety data; follow-up and verification of corrective actions; identification of repeat or systemic non-compliance; and indicators for evaluating surveillance effectiveness.

2.11 This approach would build upon, rather than duplicate, the work already undertaken in restructuring Annex 18 and material available under the USOAP CMA framework. It would also help States move from activity-based surveillance, where performance may be measured primarily by the number of inspections completed, towards surveillance that is risk-based, data-informed and focused on demonstrable safety and compliance outcomes.

2.12 The GASP finding also provides an opportunity for States to share practical experience on dangerous goods surveillance methodologies and implementation challenges. Such information could assist the DGP in determining whether additional guidance is warranted and, if so, in ensuring that it reflects operational realities and effective State practices.

2.13 In this context, the United Arab Emirates has gained practical experience in strengthening dangerous goods compliance through competency validation. Since 2023, the UAE has implemented a competency validation framework known as COVAL for personnel performing key dangerous goods functions, including dangerous goods post holders and dangerous goods training instructors. The concept was previously presented to the ICAO Dangerous Goods Panel in November 2023.

2.14 COVAL is intended to provide additional assurance that personnel occupying functions with a significant influence on dangerous goods safety possess and maintain the necessary technical knowledge, practical competency and understanding of their regulatory responsibilities. The approach complements, rather than replaces, approved dangerous goods training and regulatory surveillance.

2.15 The UAE experience suggests that competency validation of personnel performing key dangerous goods functions can provide States with an additional mechanism to support sustained compliance, reinforce accountability and strengthen dangerous goods safety culture within regulated entities. Such competency assurance can also support the effectiveness of State surveillance by providing greater assurance regarding the capability of personnel responsible for implementing and maintaining dangerous goods compliance systems.

2.16 The UAE experience with COVAL is presented as an example of a State initiative that may contribute to the broader exchange of experiences and good practices concerning competency assurance and the effectiveness of dangerous goods surveillance.

3. CONCLUSION

3.1 This information paper invites the DGP-WG to consider:

a) the significance of the dangerous goods surveillance challenge identified under OPS/CE-7 in the GASP 2026–2028, and how the proposed restructuring of Annex 18 may contribute to addressing this challenge;

b) practical challenges and State experiences in implementing effective, risk-based and performance-informed dangerous goods surveillance, including the use of safety information, competency assurance and effective follow-up of corrective actions; and

c) how existing and forthcoming ICAO guidance material, particularly the Manual on Oversight and Management of the Safe Transport of Dangerous Goods by Air, could further support States in implementing the relevant Annex 18 provisions, while avoiding duplication of existing USOAP CMA guidance.

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