International Civil Aviation Organization

DGP-WG/26-WP/33
26/10/26

WORKING PAPER

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

Centurion, South Africa, 26 to 30 October 2026

Agenda Item 2: Managing air-specific safety risks and identifying anomalies (REC-A-DGS-2029)
2.2: Develop proposals, if necessary, for amendments to the Technical Instructions for the *Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2029-2030 Edition

CLARIFICATION OF THE CARRY-ON BAGGAGE PROVISION FOR BATTERY-POWERED MOBILITY AIDS (E.G. WHEELCHAIRS) IN TABLE 8-1

(Presented by P. Guo)

SUMMARY

The purpose of this working paper is to clarify the meaning of "(see e))" in the "Carry-on baggage" column of item 4) of Table 8-1, i.e. that the mobility aid itself may not be carried as carry-on baggage and only the lithium ion batteries referred to in e) must be carried in the cabin, and to amend the column to read "No, see e)".

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Item 4) of Table 8-1 "Provisions for dangerous goods carried by passengers or crew" in Part 8, Chapter 1 of the *Technical Instructions for the Safe Transport of Dangerous Goods by Air*, (Doc 9284) addresses mobility aids (e.g. wheelchairs) powered by spillable batteries, non-spillable wet batteries, dry batteries, nickel-metal hydride batteries or lithium ion batteries. For this item, the "Checked baggage" column reads "Yes" and the "Approval of the operator(s) is required" column reads "Yes", whereas the "Carry-on baggage" column only reads "(see e))", and does not conclude whether the mobility aid itself and spare batteries of other types may be carried as carry-on baggage, i.e. they could either be taken into the cabin or not.

1.2 The common understanding in the industry is that the mobility aid itself, regardless of the type of battery powering it, may only be carried as checked baggage, and that the reference "(see e))" in the "Carry-on baggage" column points only to the lithium ion batteries that must be carried in the cabin under e), i.e. lithium ion batteries removed from the mobility aid and spare lithium ion batteries. The

mobility aid itself, and spare batteries of other types (including the spare non-spillable wet battery), may not be carried as carry-on baggage.

1.3 This ambiguity has already caused problems in practice. When an airline handled a large group of passengers with disabilities travelling to a major sporting event, many of them carried small, collapsible mobility aids powered by lithium ion batteries (similar devices are shown in Figures 1 to 3). Because these mobility aids are relatively small when folded, many passengers insisted on taking them into the cabin as carry-on baggage. As the "Carry-on baggage" column of Table 8-1 does not clearly read "No", the airline was unable to refuse these requests on the basis of the Technical Instructions, which affected flight operations.



Figure 1. Small collapsible powered wheelchair



Figure 2. Collapsible powered mobility aid (unfolded)



Figure 3. The same device folded

Images are for illustration only, to show the typical size and form of such devices.

1.4 From the operator's perspective, carrying such mobility aids in the cabin presents practical difficulties even when they are small:

a) the folded dimensions and weight of these mobility aids usually still exceed the limits of overhead bins and under-seat stowage, so they are difficult to stow in the same way as ordinary baggage;

b) if stowed in the cabin, specific equipment would be needed to restrain them so that they do not shift during turbulence or an emergency landing, and a suitable location would need to be found that does not obstruct evacuation routes or access to emergency equipment; and

c) the Technical Instructions contain no requirements on the stowage or restraint of mobility aids in the cabin, so operators have no common basis for handling such requests.

1.5 To ensure a consistent understanding among States and operators and to avoid disputes during implementation, it is proposed that the DGP-WG clarify the intent of the "Carry-on baggage" column for item 4) of Table 8-1. If the DGP-WG confirms the understanding set out in paragraph 1.2, it is proposed that the entry in that column be amended from "(see e))" to "No, see e)". This would make clear that the mobility aid itself may not be carried as carry-on baggage, while keeping the reference to the requirement in e) that lithium ion batteries must be carried in the cabin. The proposed amendment is shown in the appendix to this working paper.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to:

a) confirm that the intent of item 4) of Table 8-1 is that battery-powered mobility aids themselves may not be carried as carry-on baggage, and that only the lithium ion batteries referred to in e) (lithium ion batteries removed from the mobility aid and spare lithium ion batteries) must be carried in the cabin; and

b) if this understanding is confirmed, agree to amend the "Carry-on baggage" column of item 4) of Table 8-1 to read "No, see e)", as shown in the appendix to this working paper.

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APPENDIX

PROPOSED CHANGES TO PART 8 OF THE TECHNICAL INSTRUCTIONS

PART 8

PROVISIONS CONCERNING PASSENGERS AND CREW

Chapter 1

PROVISIONS FOR DANGEROUS GOODS CARRIED BY PASSENGERS AND CREW

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1.1 DANGEROUS GOODS CARRIED BY PASSENGERS AND CREW

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Table 8-1. Provisions for dangerous goods carried by passengers and crew

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	Dangerous Goods		Location		Approval of the operator(s) is required	Restrictions
			Checked baggage	Carry-on baggage		
	4)	Mobility aids (e.g. wheelchairs) powered by: – spillable batteries; – non-spillable wet batteries; – dry batteries; – nickel-metal hydride batteries; or – lithium ion batteries	Yes	~~(see e))~~ No, see e)	Yes	a) for use by passengers whose mobility is restricted by either a disability, their health or age, or a temporary mobility problem (e.g. broken leg); b) the passenger should make advance arrangements with each operator and provide information on the type of battery installed and on the handling of the mobility aid (including instructions on how to isolate the battery); c) in the case of a dry battery or nickel-metal hydride battery, each battery must comply with Special Provision A123 or A199, respectively; d) in the case of a non-spillable wet battery: i) each battery must comply with Special Provision A67; and ii) a maximum of one spare battery may be carried per passenger; e) in the case of a lithium ion battery: i) each battery must be of a type which meets the requirements of each test in the *UN Manual of Tests and Criteria*, Part III, subsection 38.3; ii) when the mobility aid does not provide adequate protection to the battery: — the battery must be removed in accordance with the manufacturer's instructions;

	Dangerous Goods		Location		Approval of the operator(s) is required	Restrictions
			Checked baggage	Carry-on baggage		
						— the battery must not exceed 300 Wh; — the battery terminals must be protected from short circuit (by insulating the terminals, e.g. by taping over exposed terminals); — the battery must be protected from damage (e.g. by placing each battery in a protective pouch); and — the battery must be carried in the cabin; iii) a maximum of one spare battery not exceeding 300 Wh or two spare batteries not exceeding 160 Wh each may be carried. Spare batteries must be carried in the cabin. *Note.— When the lithium battery(ies) remain installed in the mobility aid, there is no Watt-hour limit.*

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