



## **DANGEROUS GOODS PANEL (DGP)**

### **THIRTIETH MEETING**

**Montréal, 6 to 10 October 2025**

#### **Agenda Item 3: Facilitating safe transport of dangerous goods by air (*Ref: REC-A-DGS-2027*)**

#### **TRANSPORT OF FUELS BY AIR IN CONTAINERS WITH A CAPACITY GREATER THAN PROVIDED FOR IN THE ICAO TECHNICAL INSTRUCTIONS**

(Presented by L. Cascardo)

##### **SUMMARY**

This Information Paper revisits the topic of transporting fuels by air in containers exceeding the quantities currently specified in the ICAO Technical Instructions, initially raised by a State at the Fourteenth Air Navigation Conference (Montréal, 26 August – 6 September 2024) and subsequently considered by DGP-WG/24. At that meeting, panel members concluded that amendments to the Technical Instructions were not necessary, and that any such transport should be managed through the existing exemption process. Guidance on this matter was recognized as desirable.

Since the last discussion, further considerations have emerged regarding operations in remote areas, where aviation fuel is essential for socio-economic and humanitarian purposes. Many aircraft operating in these regions do not have manufacturer-approved Auxiliary Fuel Tanks or Ferry Tanks, and operators may rely on flexible Fuel Bladders to carry additional fuel. While exemptions may be issued for such containers, clear technical guidance on their use is not yet available. This paper invites DGP Members to share their experience with similar exemptions, discuss the possibility of sharing relevant documentation, and indicate interest in developing guidance to support safe and consistent fuel transport in these unique operational contexts.

## **1. INTRODUCTION**

1.1 A proposal on the transport of fuels by air in containers exceeding the maximum capacity provided in the ICAO Technical Instructions was submitted by a State to the Fourteenth Air Navigation Conference (AN-Conf/14), Montréal, 26 August – 6 September 2024 (AN-Conf/14-WP/144). The Conference noted the submission and advised that the issue be forwarded to the Dangerous Goods Panel (DGP) for consideration, as it falls within the panel's terms of reference.

1.2 The paper highlighted the operational and socio-economic necessity of transporting fuels in larger containers in remote areas, to support air operations, regional development, and the provision of fuel for isolated populations. The original paper emphasized that such transport, where required, should be conducted through the exemption process provided for in the Technical Instructions.

## 2. PREVIOUS DISCUSSION

2.1 The topic was discussed at DGP-WG/24, Montreal, where the following points were noted (DGP-WG/24 Report, 4.3.10):

### **“4.3.10 Transport of Fuels by air in Containers with a Capacity Greater than Provided for in the ICAO Technical Instructions (DGP-WG/24-IP/4)**

4.3.10.1 A proposal was submitted to ICAO’s Fourteenth Air Navigation Conference (Montréal, 26 August to 6 September 2024) by a State seeking to transport fuels by air in containers of greater capacity than what was permitted in the Technical Instructions (AN-Conf/14- WP/144). The State was advised that it would be forwarded to the DGP for consideration, given that it was an issue within the scope of the panel’s terms of reference.

4.3.10.2 DGP-WG/24 was invited to provide feedback on the issue raised. A formal working paper would be presented to the 2025 DGP Working Group meeting, if deemed necessary, based on the feedback provided.

4.3.10.3 Members were not supportive of including provisions in the Technical Instructions for the containers because of the many safety considerations that would need to be considered. They noted that these containers were used through the exemption process. Other members advised of similar challenges within their States and expressed a desire for a suitable standard that could be used to ease the exemption process. One panel member noted that guidance had been developed in a State in his region, but the technical specifications were still being evaluated and assessed. He would monitor the progress and bring the material to the panel once it had been successfully evaluated.”

2.2 Since the last presentation of this document in 2024, a few discussions took place in our region, especially regarding the issuance of exemptions. While the granting of exemptions is possible, there is currently no clear guidance for this specific case. Nevertheless, it is understood that, even when an exemption is granted, maximum quantities should remain at least consistent with the applicable packaging instruction in the UN Model Regulations, in this case Packing Instruction P001.

## 3. CURRENT CONSIDERATIONS

3.1 It is noted that this issue primarily affects States with small-scale operations in remote areas, where transporting aviation fuel is essential for safe return flights or for providing fuel to support local populations. The matter therefore has a socio-economic dimension.

3.2 Issuing exemptions for larger containers can alleviate logistical challenges, reduce social-economic and humanitarian challenges, and support the timely delivery of fuel to isolated regions. At the same time, any guidance on exemptions should ensure equivalent safety levels to those provided in the Technical Instructions.

3.3 In addition, it is important to note that some aircraft models allow for the use of auxiliary fuel tanks, also referred to as ferry tanks, which in some cases are accepted by the aircraft manufacturer. However, for the majority of aircraft operating in the remote regions referenced in the original paper, no such provision exists. This indicates that these operations generally rely on external solutions, rather than built-in aircraft systems, to transport additional fuel safely.

3.4 So, one option under consideration is the use of fuel bladders, robust, flexible bags or containers that can be filled and emptied for the transport of fuel. These are commonly known in military aviation operations. These bladders have been considered in the context of exemption requests, but specific technical requirements for their safe use in commercial operations are not yet fully defined. Further discussion is necessary to identify the critical requirements for these fuel containers should exemptions be issued.

#### 4. **DISCUSSION**

4.1 In light of the above, Dangerous Goods Panel members are invited to:

- a) Indicate whether their State has issued, or currently issues, exemptions allowing the use of fuel containers with capacities greater than those provided for in the ICAO Technical Instructions.
- b) If such exemptions have been issued, indicate whether information on these exemptions can be shared, while respecting confidentiality and operational sensitivities, to assist other States facing similar challenges.
- c) Indicate whether there is interest in the next biennium to develop guidance, either for inclusion in the Supplement to the Technical Instructions or via ICAO online resources, to support States in the issuance of exemptions for this type of fuel transport.

— END —