



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)**

**THIRTIETH MEETING**

**Montréal, 6 to 10 October 2025**

**Agenda Item 2: Managing air-specific safety risks and identifying anomalies (REC-A-DGS-2027)**

**2.3: Develop proposals, if necessary, for amendments to the Supplement to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284SU) for incorporation in the 2027-2028 Edition**

**DRAFT AMENDMENTS TO GUIDANCE FOR PROCESSING EXEMPTIONS AND APPROVALS CONTAINED IN THE SUPPLEMENT TO THE TECHNICAL INSTRUCTIONS**

(Presented by the Rapporteur DGP-WG/Supplement)

**SUMMARY**

This working paper reintroduces draft amendments to guidance for processing exemptions and approvals contained in Part S-1, Chapter 1, Attachment I to the Supplement to the Technical Instructions initially presented at the DGP'S 2022 Working Group Meeting (DGP-WG/22, Montreal, 21 to 25 November 2022). The text incorporates feedback received during and after that meeting, as well as input from the DGP Working Group on the Supplement (DGP-WG/Supplement).

The purpose is to present an updated version that improves clarity and usability, while recognizing that further refinements may be needed over time.

**Action by the DGP:** The DGP is invited to review and agree to the draft amendments shown in the appendix to this working paper.

**1. INTRODUCTION**

1.1 Following on from the DGP's 2022 Working Group Meeting (DGP-WG/22, Montreal, 21 to 25 November 2022) (see paragraph 4.2.3.1 of the DGP-WG/2 report) and in line with the work schedule for DGP, the DGP Working Group on the Supplement (DGP-WG/Supplement) has reviewed and updated draft amendments to guidance for processing exemptions and approvals contained in Part S-1, Chapter 1, Attachment I to the Supplement to the Technical Instructions that was presented AT DGP-WG/22.

1.2 The draft amendments are presented in the appendix to this working paper. They incorporate feedback received from members during DGP-WG/22, subsequent comments received via e-mail, and recent input from members of DGP-WG/Supplement.

1.3 The objective of presenting this material again is to provide a more refined and enhanced version of the guidance, aiming to improve clarity and usability in the Supplement.

1.4 DGP-WG/Supplement will continue developing and refining this text, when necessary, recognizing that future changes may be needed.

## 2. **ACTION BY THE DGP**

2.1 The DGP is invited to review and agree to the draft amendments shown in the appendix to this working paper.

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## APPENDIX

### PROPOSED AMENDMENT TO PART S-1 OF THE SUPPLEMENT TO THE TECHNICAL INSTRUCTIONS

## Part S-1

## GENERAL

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### ATTACHMENT I TO CHAPTER 1

### GUIDANCE FOR PROCESSING ~~EXEMPTIONS~~ **APPROVALS** AND ~~APPROVALS~~ **EXEMPTIONS** FOR THE SAFE TRANSPORT OF DANGEROUS GOODS BY AIR

#### A. General Guidance

The Technical Instructions for the Safe Transport of Dangerous Goods by Air provide requirements to safely transport dangerous goods by air. These requirements often exceed the requirements of other modes of transport commensurate with the unique and sensitive nature of air transport.

Part 1 of the Technical Instructions provides for the issuance of approvals and exemptions in certain instances as described in 1;1.1.2 and 1;1.1.3, respectively. States which issue an ~~exemption~~**approval** or ~~approval~~**exemption** should have a review process in place and exercise the appropriate technical competency to conduct a thorough evaluation and impose the necessary safety measures to ensure that the conditions of the ~~exemption~~**approval** or ~~approval~~**exemption** issued provide an equivalent level of safety to the requirements of the Technical Instructions.

*Note 1.— Attachment I to Chapter 5 provides a generic competency framework for dangerous goods State technical personnel.*

#### Who must obtain an ~~exemption~~**approval** or ~~approval~~**exemption**?

The responsibility for obtaining an approval or exemption ~~may rest~~**rests** with the operator, ~~or with~~ the shipper or with both depending on the nature of the request and on State procedures. ~~The shipper should be requested to identify an operator that is prepared to carry the cargo should the approval or exemption be issued. It is also useful for States to include the operator in the consideration of the conditions that will apply to the approval or exemption so that the operator is able to conduct a specific safety risk assessment for the planned operation.~~

#### **What additional information should the States consider obtaining in the application process?**

The States should consider the following:

- whether the application is received from or on behalf of the operator;
- if the State of Origin is different to the State of Operator;
- whether the operator is certified to transport the dangerous goods under an approval or exemption;
- a safety risk assessment submitted by the operator as part of the application;
- whether the operator's safety risk assessment covers all activities requested within the application.

It is also useful for States to include the operator in the consideration of the conditions that will apply to the approval or exemption so that the operator is able to conduct a specific safety risk assessment for the planned operation, as required by Annex 6 — Operation of Aircraft, Part I — International Commercial Air Transport — Aeroplanes.

*Note 2.— Guidance on the conduct of a specific safety risk assessment on the transport of items in the cargo compartment is contained in the Cargo Compartment Operational Safety Manual (Doc 10102).*

Note 3.— The shipper should be requested to identify an operator that is prepared to carry the cargo should the approval or exemption be issued.

**When may States grant ~~exemptions~~approvals or ~~approvals~~exemptions from the provisions of the Technical Instructions?**

Approvals may be issued where specifically provided for in the Technical Instructions. Exemptions may be granted in cases of extreme urgency, or when other forms of transport are inappropriate, or full compliance with the prescribed requirements is contrary to public interest.

**What are the responsibilities of the requestor?**

It is the responsibility of the requestor to identify the specific requirements of the Technical Instructions from which relief is sought, and ensure that supporting information is provided which demonstrates that the proposed transport provisions equal or exceed the level of safety provided by the Technical Instructions.

**What is an equivalent level of safety?**

It is important for States to ensure that an equivalent level of safety is maintained in the issuance of any ~~exemption~~approval or ~~approval~~exemption. An equivalent level of safety is maintained when compensating measures ensure the overall level of safety equals that of the Technical Instructions. An equivalent level of safety evaluation will consider:

- the applicable requirements from which relief is sought;
- the compensating modifications, limitations, restrictions or equipment imposed;
- how these modifications provide an equivalent level of safety to the requirements of the Technical Instructions.

**Can forbidden dangerous goods ever be transported?**

Some dangerous goods designated as forbidden may be transported if certain conditions are met. The provisions of the Technical Instructions and this Supplement should be followed if there is a need to transport these substances.

Other dangerous goods cannot be carried on aircraft under any circumstance. These include articles or substances which, as presented for transport, are liable to explode, ~~react~~ dangerously ~~react~~, produce a flame or dangerous evolution of heat or dangerous emission of toxic, corrosive or flammable gases or vapours under conditions normally encountered in transport. Dangerous goods meeting this description are included in the Dangerous Goods List (Table 3-1) of the Technical Instructions with the word “Forbidden” shown in columns 2 and 3, but this list is not inclusive. It is essential that appropriate care be exercised to ensure that goods meeting this description are not offered for transport.

**What packaging standards should be considered?**

Where an entry in Table S-3-1 has a number in parenthesis after the word “Forbidden”, this refers to a packing instruction which contains the method of packing that should be specified when issuing an exemption. As much as possible, appropriate packing instruction numbers are indicated in columns 10 to 13 of Table S-3-1 and the associated detailed requirements appear in Part S-4, where these are additional to those given in the Technical Instructions.

Where the approval or exemption references a packing instruction that is not included in the Technical Instructions, it is recommended that the approval or exemption document that is issued include the packing instruction, or at least those parts that are required ~~by~~for the shipper when preparing a consignment for transport and those parts that are required for the operator when performing its acceptance check of the consignment.

**What quantity limitations should be considered for entries subject to Special Provision A1 or A2?**

The quantity shown in parenthesis in columns 11 or 13 of Table S-3-1 is the maximum net quantity per package which qualifies for an approval under Special Provisions A1 and A2. Exceeding this limit may only be ~~done~~permitted through the issuing of an exemption.

**What quantity limitations should be considered for entries not subject to Special Provision A1 or A2?**

The suggested maximum quantity limitations to be permitted are indicated in Table S 3 2 or S 3 3 for some classes and divisions.

**May an approval ~~or exemption~~ be granted to authorize the transport of an ~~forbidden~~ explosive?**

Only ~~E~~explosives ~~assigned transported in accordance with~~to Special Provision A1 or A2 of the Technical Instructions may ~~only~~ be transported under the provisions of an approval. Explosives which are not assigned Special Provision A1 or A2 may ~~only be transported under the provisions of an exemption. Explosives transported in excess of their authorized quantities may only be transported under the provisions of an exemption.~~

~~May an exemption be granted to authorize the transport of a forbidden explosive or an explosive transported in excess of authorized quantities?~~

~~Explosives transported in excess of their authorized quantities and forbidden explosives may only be transported under the provisions of an exemption.~~

**B. Considerations for ~~Exemptions~~Approvals and/or ApprovalsExemptions**

It is recognized that competent authorities may have varying formats for issuing ~~exemptions~~approvals and/or ~~approvalsexemptions~~. The following information is suggested for consideration by States when issuing such documents:

- A synopsis of the ~~exemption~~approval's or ~~approval~~exemption's scope and purpose. This should include the reason the ~~exemption-or~~ approval ~~or exemption~~ is necessary.
- The authority under which the ~~exemption~~approval or ~~approval~~exemption is issued. For an approval, the specific approval citation within the Technical Instructions should be listed. For an exemption, Part 1, Chapter 1, 1.1.3 of the Technical Instructions should be cited. ~~For an approval, the specific approval citation within the Technical Instructions should be listed.~~ The issuing State's national legislation or authority may also be listed.
- A description of the dangerous goods authorized. At a minimum, this information should include the UN number, proper shipping name, class, subsidiary hazard, and packing group (if applicable)-number.
- Specific provisions on how the dangerous goods must be prepared for shipment under the ~~exemption~~approval/~~exemption~~ authorization. These provisions should demonstrate that an equivalent level of safety to the requirements of the Technical Instructions has been determined.
- The conditions of transport, for example, authorized packaging, quantities, and any additional hazard communication ~~elements~~ that may apply.
- Any special conditions that may apply such as whether persons other than the grantee may re-offer the dangerous goods for subsequent transportation.
- Any limitations that may apply, for example, whether the approval is limited to a single instance, to a specific operator, or any other limitations.
- Whether transport by passenger and/or cargo aircraft is authorized.
- Any special reporting requirements relevant to the reporting of any incident associated with the ~~exemption~~approval or ~~approval~~exemption.

Additional considerations for the operator ~~must~~should also be ~~addressed~~included. Safety conditions for operators to address may include:

- restrictions on the location and of loading and unloading of cargo;
- restrictions on the time of day of the flight to daylight hours (including loading and unloading);
- restrictions to take-off or land only in visual meteorological conditions;
- flight planning to avoid population-dense areas;
- restrictions on the use of hand-held transmitting devices in the vicinity of the dangerous goods;
- restrictions on the use of aircraft radios and radar during loading and unloading;
- restrictions on the passengers on board;
- carriage of additional firefighting equipment; ~~and/or~~
- additional segregation requirements; ~~;~~
- restrictions on when refueling is to be carried out; and/or
- restrictions on weather conditions during loading (such as during thunderstorms).

The considerations above are not exhaustive. A full hazard identification and risk assessment should be conducted prior to the State's issuance of approvals and exemptions.

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