



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)**

**THIRTIETH MEETING**

**Montréal, Canada, 6 to 10 October 2025**

- Agenda Item 2: Managing air-specific safety risks and identifying anomalies (REC-A-DGS-2027)**  
**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 2027-2028 Edition**
- Agenda Item 8: Coordination with other Air Navigation Commission panels**

**HARMONIZATION OF TERMINOLOGY: APPROVAL OR SPECIFIC APPROVAL**

(Presented by L. Cascardo)

**SUMMARY**

This working paper is in follow up to the discussion initiated at the 2025 DGP Working Group Meeting with respect to the consistent use of “approval” versus “specific approval” (see paragraph 4.2.2.6 of the DGP-WG/25 Report). Taking into account the intent of a “specific approval” described in Annex 6, it questions whether the terminology is appropriate with respect to requiring the designated postal operator to receive one from the civil aviation authority before it can introduce the acceptance of lithium batteries contained in equipment in the mail, as required by Part 1;2.3.4 of the Technical Instructions. It highlights potential inconsistencies and presents options for addressing them in Appendix A for the DGP’s consideration. It also proposes an editorial revision to an amendment to the training provisions replacing “approval” with “specific approval” agreed at DGP-WG/25, presented in Appendix B to this working paper.

**Action by the DGP:** The DGP is invited to:

- a) agree to one of the three optional amendments to the Technical Instructions proposed in Appendix A to this working paper; and
- b) agree to the editorial revision to the amendment to the training provisions agreed at DGP-WG/25 proposed in Appendix B to this working paper.

## 1. INTRODUCTION

1.1 This working paper is in follow up to the discussion initiated at the 2025 DGP Working Group Meeting with respect to the consistent use of “approval” versus “specific approval” (see paragraph 4.2.2.6 of the DGP-WG/25 Report). It is part of an ongoing effort to harmonize the use of terminology raised in other working papers at this meeting and expected to continue at future meetings. Taking into account the intent of a “specific approval” described in Annex 6, it questions whether the terminology is appropriate with respect to requiring the designated postal operator to receive one from the civil aviation authority before it can introduce the acceptance of lithium batteries contained in equipment in the mail, as required by Part 1;2.3.4 of the Technical Instructions. It highlights potential inconsistencies and presents options for addressing them in Appendix A for the DGP’s consideration. It also proposes an editorial revision to an amendment to the training provisions replacing “approval” with “specific approval” agreed at DGP-WG/25, presented in Appendix B to this working paper.

1.2 Annex 6 — *Operation of Aircraft* uses “specific approval” as the official terminology when referring to an operator's authorization to transport dangerous goods as cargo. According to Annex 6, Part I, Attachment B:

## 2. REQUIRED TECHNICAL SAFETY EVALUATIONS

### 2.1 Specific approval, approval and acceptance actions

2.1.1 The certification and continued surveillance of an air operator includes actions taken by a State on matters submitted for its review. The actions can be categorized as specific approvals, approvals or acceptances depending on the nature of the response by the State to the matter submitted for its review.

2.1.2 A specific approval is an approval which is documented in the Operations Specifications for Commercial Air Transport.

2.1.3 An approval is an active response by the State to a matter submitted for its review. An approval constitutes a finding or determination of compliance with the applicable standards. An approval will be evidenced by the signature of the approving official, the issuance of a document or certificate, or some other formal action taken by the State.

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## 3. AUTHORIZATIONS

An authorization entitles an operator, owner or pilot-in-command to undertake the authorized operations. Authorizations can take the form of specific approvals, approvals or acceptances.

### 3.1 Specific approval actions

3.1.1 The term “specific approval” indicates a formal action on the part of the State of the Operator which results in an addition to the operations specification.

...

1.3 The use of the term “specific approval” in Part 1;2.3.4 of the Technical Instructions may cause confusion, since designated postal operators (DPOs) do not receive operations specifications for commercial air transport as described in Annex 6, Part I, Attachment B, paragraphs 2.1.2 and 3.1.1.

Instead, the approval for DPOs is usually provided through a different type of document issued by the competent authority, which is not formally considered an operations specification.

1.4 During the discussion at DGP-WG/25 (see paragraph 4.2.2.6 of the DGP-WG/25 Report), a few members noted that further discussion would be useful on the terminology applied to the DPO. It was suggested that the use of “specific approval” may not be the most appropriate expression in this context, and that an alternative term might better describe the type of authorization granted to DPOs for the acceptance of lithium batteries contained in equipment.

1.5 During the discussion of the same paper, it was noted that “*several other references to ‘approval’ in the Technical Instructions should potentially be replaced with ‘specific approval’*”, as presented in the meeting report. However, a thorough search of all occurrences of the terms “approval” and “approved” found no instances that would require such changes. Further clarification from those who made the comments would be needed to continue this work, if necessary.

## 2. PROPOSAL

2.1 This paper proposes that the DGP consider which terminology should be used with respect to the DPO to ensure the most clarity and alignment with Annex 6 definitions, while also ensuring consistency within the Technical Instructions.

2.2 Three possible options could be considered:

- a) **Option 1: Maintain “specific approval” while adding an explanatory note.** The terminology would remain unchanged. However, a clarifying note could be added to explain that, in this particular context, the term differs from the one used in Annex 6, Part I. Instead of being reflected in *operations specifications*, the approval for DPOs would be issued through a different document provided by the authority;
- b) **Option 2: Replace “specific approval” with “approval”.** The wording would be changed to “approval”, which would align more closely with the Annex 6 definition. However, this could create some confusion, as “approval” is already used in other contexts within the Technical Instructions.
- c) **Option 3: Replace “specific approval” with “authorization”.** The wording would be changed to “authorization”. According to Annex 6, Part I, *authorization* is a broader term that encompasses specific approvals, approvals, and acceptances. This option would provide flexibility and avoid the narrow interpretation associated with “*specific approval*”.

## 3. EDITORIAL REVISION TO AN AMENDMENT RELATED TO APPROVAL OF TRAINING PROGRAMMES AGREED IN PRINCIPLE AT DGP-WG/25

3.1 DGP-WG/25 agreed to an amendment replacing “approval” with “specific approval” in relation to the establishment of training programmes by the operator, pending the panel’s agreement of precise wording to ensure alignment with Annex 6 terminology (e.g. ‘have a specific approval’, ‘hold a specific approval’, or ‘have been issued a specific approval’)” (see paragraph 4.2.2.6 of the DGP-WG/25

Report). Upon further review, the expression “*have a specific approval*” appears in Annex 6 twice and only in the context of dangerous goods. In all other contexts, the more commonly used expression is “*issue a specific approval*”, which may suggest that the expressions used in the context of dangerous goods should be reconsidered. Accordingly, an editorial revision to the amendment approved at DGP-WG/25 is presented in Appendix B.

#### 4. ACTION BY THE DGP

##### 4.1 The DGP is invited to:

- a) agree to one of the three optional amendments to the Technical Instructions proposed in Appendix A to this working paper; and
- b) agree to the editorial revision to the amendment to the training provisions agreed at DGP-WG/25 proposed in Appendix B to this working paper (editorial revision is highlighted in yellow).

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## APPENDIX A

### OPTIONAL PROPOSED AMENDMENTS TO CLARIFY TERMINOLOGY USED WITH RESPECT TO AUTHORIZING THE DESIGNATED POSTAL OPERATOR TO INTRODUCE THE ACCEPTANCE OF LITHIUM BATTERIES CONTAINED IN EQUIPMENT IN THE MAIL

## Part 1

## GENERAL

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**OPTION 1:** Maintain “specific approval” while adding an explanatory note.

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### 2.3 TRANSPORT OF DANGEROUS GOODS BY POST

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2.3.2 The following dangerous goods may be acceptable in mail for air carriage subject to the provisions of the appropriate national authorities concerned and these Instructions:

...

- d) lithium ion batteries contained in equipment (UN 3481) meeting the provisions of Section II of Packing Instruction 967. No more than four cells or two batteries may be mailed in any single package; and
- e) lithium metal batteries contained in equipment (UN 3091) meeting the provisions of Section II of Packing Instruction 970. No more than four cells or two batteries may be mailed in any single package.

2.3.3 The procedures of designated postal operators (DPOs) for controlling the introduction of dangerous goods in mail into air transport are subject to review and approval by the Civil Aviation Authority of the State where the mail is accepted.

2.3.4 The DPO must have received specific approval from the Civil Aviation Authority before the DPO can introduce the acceptance of lithium batteries as identified in 2.3.2 d) and e).

*Note 1.— Designated postal operators may accept the dangerous goods identified in 2.3.2 a), b) and c) without receiving specific approval from the Civil Aviation Authority.*

*Note 2.— Guidelines for appropriate national authorities and civil aviation authorities are contained in the Supplement to these Instructions (S-1;3).*

*Note 3.— For the purpose of this chapter, “specific approval” differs from the definition in Annex 6, Part I, Attachment B, as it refers to an authorization issued by the civil aviation authority following an evaluation of the procedures of DPOs to introduce the acceptance of lithium batteries as identified in 2.3.2 d) and e).*

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**OPTION 2: Replace “specific approval” with “approval”**

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**OPTION 3: Replace “specific approval” with “authorization”**

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*Note 1.— Designated postal operators may accept the dangerous goods identified in 2.3.2 a), b) and c) without receiving specific approval from the Civil Aviation Authority.*

*Note 2.— Guidelines for appropriate national authorities and civil aviation authorities are contained in the Supplement to these Instructions (S-1;3).*

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## APPENDIX B

### EDITORIAL REVISION TO A PROPOSED AMENDMENT TO THE TECHNICAL INSTRUCTIONS AGREED AT DGP-WG/25

#### Part 1

#### GENERAL

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See paragraph 4.2.2.6 of DGP-WG/25 report:

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#### Chapter 4

#### DANGEROUS GOODS TRAINING

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##### 4.1 ESTABLISHMENT OF DANGEROUS GOODS TRAINING PROGRAMMES

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DGP/30 is invited to consider adding the yellow highlighted text to the text agreed at DGP-WG/25 in square brackets:

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4.1.2 All operators must establish a dangerous goods training programme regardless of whether or not they ~~are approved~~ **[have been issued]** a specific approval to transport dangerous goods as cargo.

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