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DANGEROUS GOODS PANEL (DGP)

THIRTIETH MEETING

Montréal, Canada, 6 to 10 October 2025

Agenda Item 5: Clarifying State oversight responsibilities in Annex 18 (Ref: Job Card DGP.005.05)

PROPOSED AMENDMENTS TO ANNEX 6 DEVELOPED BY THE DGP-FLTOPSP INTERPANEL WORKING GROUP

(Presented by the Secretary)

SUMMARY

This working paper presents an amendment to Annex 6 developed by the DGP Working Group on Annex 18 and a Dangerous Goods Panel/Flight Operations Panel (FLTOPSP) inter-panel working group.

Action by the DGP: The DGP is invited to review and comment on the amendment to Annex 6 presented in the appendix to this working paper for onward submission to FLTOPSP for consideration at its twelfth meeting (FLTOPSP/12, Montreal, 17 to 21 November 2025).

PROPOSED AMENDMENT TO

ANNEX 6

OPERATION OF AIRCRAFT

PART I — *INTERNATIONAL COMMERCIAL AIR TRANSPORT — AEROPLANES*

CHAPTER 1. DEFINITIONS

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Dangerous goods. Articles or substances which are capable of posing a ~~risk~~ hazard to health, safety, property or the environment and which are shown in the list of dangerous goods in the Technical Instructions or which are classified according to those Instructions.

Note. — Dangerous goods are classified in Annex 18, Chapter 3.

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Technical Instructions. The Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284), approved and issued periodically in accordance with the procedure established by the ICAO Council.

<i>Origin:</i>	<i>Rationale:</i>
<i>DGP/FLTOPSP Inter-panel WG</i>	Amendment to dangerous goods definition is proposed for the sake of alignment with Annex 18.
	Definition for Technical Instructions, which is included in Annex 18, is proposed given that it is referenced in Annex 6.

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CHAPTER 4. FLIGHT OPERATIONS

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4.2 OPERATIONAL CERTIFICATION AND SUPERVISION

4.2.1 The air operator certificate

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4.2.1.3.1 The operator shall develop policies and procedures for third parties that perform work on its behalf.

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4.2.3 Operations manual

4.2.3.1 The operator shall provide, for the use and guidance of operations personnel concerned, an operations manual in accordance with Appendix 2. The operations manual shall be amended or revised as is necessary to ensure that the information contained therein is kept up to date. All such amendments or revisions shall be issued to all personnel that are required to use this manual.

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4.5 DUTIES OF PILOT-IN-COMMAND

4.5.6 If an in-flight emergency occurs, the pilot-in-command shall, as soon as the situation permits, inform the appropriate air traffic services unit, for the information of aerodrome authorities, of any dangerous goods on board the aircraft, as provided for in the Technical Instructions.

<i>Origin:</i>	<i>Rationale:</i>
<i>DGP/FLTOPSP Inter-panel WG</i>	Moved this Standard from Annex 18 given that it is a duty of the pilot-in-command and therefore more relevant to Annex 6.

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CHAPTER 9. AEROPLANE FLIGHT CREW

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9.3 FLIGHT CREW MEMBER TRAINING PROGRAMMES

9.3.1 The operator shall establish and maintain a ground and flight training programme, approved by the State of the Operator, which ensures that all flight crew members are adequately trained to perform their assigned duties. The training programme shall:

- a) include ground and flight training facilities and properly qualified instructors as determined by the State of the Operator;
- b) consist of ground and flight training in the type(s) of aeroplane on which the flight crew member serves;
- c) include proper flight crew coordination and training in all types of emergency and abnormal situations or procedures caused by engine, airframe or systems malfunctions, fire or other abnormalities;
- d) include upset prevention and recovery training;
- e) include training in knowledge and skills related to visual and instrument flight procedures for the intended area of operation and charting;
- f) provide instruction regarding human performance including threat and error management; and
- g) in the ensure that flight crew members are competent to perform functions related to the transport of dangerous goods for which they are responsible;

f) ensure that all flight crew members know the functions for which they are responsible and the relation of these functions to the functions of other crew members, particularly in regard to abnormal or emergency procedures; and

g) be given on a recurrent basis, as determined by the State of the Operator and shall include an assessment of competence.

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<i>Origin:</i>	<i>Rationale:</i>
<i>DGP-WG/Annex 18</i>	e) and f): Separation of dangerous goods from unrelated elements and suggestion to also create a unique list item for human performance. g): Alignment with terminology used in amendment to Annex 18, Chapter 9, Training and Assessment and in the Technical Instructions.

CHAPTER 14. DANGEROUS GOODS

14.1 STATE RESPONSIBILITIESGENERAL

The operator shall not transport dangerous goods unless it has been issued a specific approval by the State of the Operator, other than the following:

- a) dangerous goods that are excepted by Annex 18, Chapter 2;
- b) dangerous goods carried by passengers and crew members;
- c) mail other than mail containing solid carbon dioxide (dry ice); and
- d) dangerous goods in [excepted quantities or] de minimis quantities.

~~Note 1.— Annex 18, Chapter 11, contains requirements for each Contracting State to establish oversight procedures for all entities (including packers, shippers, ground handling agents and operators) performing dangerous goods functions.~~

Note 1.— Annex 18 includes broad provisions for the international transport of dangerous goods by air which are amplified in the Technical Instructions. Annex 18, Chapter 2 includes provisions making some dangerous goods not subject to Annex 18 under certain conditions. These are amplified in Parts 1;1 and 1;2 of the Technical Instructions.

~~Note 2.— Operator responsibilities for the transport of dangerous goods are contained in Chapter 8, 9 and 10 of Annex 18. These are amplified in Part 7 of the Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284) (Technical Instructions) contains the operator's responsibilities and requirements for incident and accident reporting.~~

~~Note 3.— The requirements pertaining to crew members or passengers carrying dangerous goods on aircraft are set forth established in Part 8, Chapter 1, of the Technical Instructions.~~

Note 4.— Dangerous goods being transported which are intended as replacement for or removed for replacement of those required to be aboard an aircraft in accordance with pertinent airworthiness requirements and operator regulations are subject to the requirement for a specific approval in 14.1 and must be transported in accordance with Part 1;2.2.2-~~or~~, Part 1;2.2.3 or Part 1;2.2.4 of the Technical Instructions (e.g. aircraft parts such as chemical oxygen generators, fuel control units, fire extinguishers, oils, lubricants, cleaning products).

<p><i>Origin:</i></p> <p>DGP-WG/Annex 18</p>	<p><i>Rationale:</i></p> <p>Note 1 is proposed for deletion as it is considered redundant given the referenced SARP is proposed for deletion from Annex 18. Oversight of the operator is covered by this Annex and for the other referenced entities through the States safety risk management activities required by Annex 19. This is clarified through the proposed amendment to Annex 18 and will be elaborated upon through new guidance material being developed to support implementation of Annex 18.</p> <p>New Note 1 is proposed to make it clear that there are operational activities involving dangerous goods that are not subject to Annex 18.</p> <p>The amendments in Note 2 are editorial amendments to references to reflect the new proposed structure of Annex 18.</p> <p>The amendment to Note 3 is made to align with long-standing language used in Annex 18 which is considered less ambiguous and does not depend on terminology that is not used internationally.</p>
<p><i>Origin:</i></p> <p>DGP/FLTOPSP Inter-panel WG</p>	<p><i>Rationale:</i></p> <p>Despite efforts to prevent operators without specific approval to transport dangerous goods from transporting them, dangerous goods are still discovered in cargo of operators, often COMAT, without approval. This Standard makes it clear up front that operators without a specific approval cannot transport dangerous goods other than the stated exceptions. Dangerous goods in de minimis quantities and mail excluding dry ice have been included in the exceptions because they do not require hazard labels or acceptance checks. The DGP needs to decide whether dangerous goods in excepted quantities should also be included in the exceptions for transport without an approval.</p>

14.2 OPERATORS WITH NO SPECIFIC APPROVAL FOR THE TRANSPORT OF DANGEROUS GOODS ~~AS CARGO~~

The State of the Operator shall ensure that operators with no specific approval to transport dangerous goods have:

- a) established a dangerous goods training programme that meets the requirements of Annex 18, ~~the applicable requirements of the Technical Instructions, Part 1, Chapter 4, Chapter 9~~ and the requirements of the State's regulations, as appropriate. Details of the dangerous goods training programme shall be included in the ~~operator's~~ operations manuals;
- b) established dangerous goods ~~policies and~~ procedures, instructions and guidance in its operations manual ~~to meet for personnel executing~~, at a minimum, the requirements of Annex 18, Chapter 6, 6.2, the Technical Instructions and the State's regulations ~~to allow operator personnel to:~~
 - 1) ~~identify and reject undeclared dangerous goods, including COMAT classified as dangerous goods; and~~
 - 2) ~~report to the appropriate authorities of the State of the Operator and the State in which it occurred any:~~

- ~~i) occasions when undeclared dangerous goods are discovered in cargo or mail; and~~
- ~~ii) dangerous goods accidents and incidents.~~

<i>Origin:</i>	<i>Rationale:</i>
DGP-WG/Annex 18	The amendments to 14.2 are proposed to replace detailed provisions that are contained in Annex 18 with references to Annex 18 and to align with language used in Annex 18. Proposed amendments to Annex 18 include a restructuring of the chapter on the operator's responsibilities that aligns with this structure, making it easy to refer to the provisions in Annex 18.
FLTOPSP Inter-panel WG	<p>The deletion of "as cargo" is proposed to align with the field in the operations specification template and in recognition of fact that the scope of what is included in the operations specification is wider than just cargo in some States.</p> <p>The identification and rejection of dangerous goods required by b) 1) are addressed in Annex 18, Chapter 6, 6.2.3.1.</p> <p>The reporting required by b) 2 is address in Annex 18, Chapter 10, 10.1.1.</p>

14.3 OPERATORS WITH A SPECIFIC APPROVAL FOR THE TRANSPORT OF DANGEROUS GOODS ~~AS CARGO~~

The State of the Operator shall issue a specific approval for the transport of dangerous goods and ensure that the operator:

- a) establishes a dangerous goods training programme that meets the requirements ~~in the Technical Instructions, Part 1, Chapter 4, Table 1.4, of Annex 18, Chapter 9~~ and the requirements of the State regulations, as appropriate. Details of the dangerous goods training programme shall be included in the ~~operator's~~ operations manuals;
- b) establishes dangerous goods ~~policies and~~ procedures, instructions and guidance in its operations manual ~~to meet for personnel executing~~, at a minimum, the requirements of Annex 18, Chapter 6, 6.3, the Technical Instructions and the State's regulations ~~to enable operator personnel to:~~
 - ~~1) identify and reject undeclared or misdeclared dangerous goods, including COMAT classified as dangerous goods;~~
 - ~~2) report to the appropriate authorities of the State of the Operator and the State in which it occurred any:~~
 - ~~i) occasions when undeclared or misdeclared dangerous goods are discovered in cargo or mail; and~~
 - ~~ii) dangerous goods accidents and incidents;~~
 - ~~3) report to the appropriate authorities of the State of the Operator and the State of Origin any occasions when dangerous goods are discovered to have been carried;~~

- ~~i) when not loaded, segregated, separated or secured in accordance with the Technical Instructions, Part 7, Chapter 2; and~~
- ~~ii) without information having been provided to the pilot in command;~~
- ~~4) accept, handle, store, transport, load and unload dangerous goods, including COMAT classified as dangerous goods as cargo on board an aircraft; and~~
- ~~5) provide the pilot in command with accurate and legible written or printed information concerning dangerous goods that are to be carried as cargo.~~

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<p><i>Origin:</i></p> <p>DGP-WG/Annex 18</p>	<p><i>Rationale:</i></p> <p>The amendments to 14.3, other than 14.3.1 b), are proposed to replace detailed provisions that are contained in Annex 18 with references to Annex 18 and to align with language used in Annex 18. Proposed amendments to Annex 18 include a restructuring of the chapter on the operator's responsibilities that aligns with this structure, making it easy to refer to the provisions in Annex 18. The deletion of the reporting requirement in 14.3.1 b) is proposed because these types of incidents should be captured through the operator's SMS. Reporting to the State would therefore be redundant. The need for the operator to capture this through their SMS will be emphasized in the new supporting guidance material being developed to support implementation of Annex 18. A consequential amendment to the Technical Instructions, which currently contains this requirement, will need to be made if this proposal is accepted.</p>
<p>FLTOPSP Inter-panel WG</p>	<p>The deletion of "as cargo" is proposed to align with the field in the operations specification template and in recognition of fact that the scope of what is included in the operations specification is wider than just cargo in some States.</p> <p>The identification and rejection of dangerous goods required by b) 1) are addressed in Annex 18, Chapter 6, 6.3.3.</p> <p>The reporting required by b) 2) is addressed in Annex 18, Chapter 10, 10.1.1.</p> <p>The accepting, handling, storing, transporting, loading and unloading dangerous goods requirements in b) 4 are addressed in Annex 18, Chapter 6, 6.3.3.</p> <p>The NOTOC requirement in b) 5) is addressed in 6.3.5.</p>

14.4 PROVISION OF INFORMATION

The operator shall ensure that all personnel, including third-party personnel, involved in the acceptance, handling, loading and unloading of cargo are informed of the operator's specific approval and limitations with regard to the transport of dangerous goods.

14.5 DOMESTIC COMMERCIAL AIR TRANSPORT OPERATIONS

Recommendation.— *The International Standards and Recommended Practices set forth in this chapter should be applied by all Contracting States also in the case of domestic commercial air transport operations.*

Note.— *Annex 18 contains a similar provision in this regard.*

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APPENDIX 2. ORGANIZATION AND CONTENTS OF AN OPERATIONS MANUAL

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2. CONTENTS

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2.1 General

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2.1.35 Information and instructions on the carriage of dangerous goods, in accordance with Chapter 14, including:

- a) information and instructions for crew members as will enable them to carry out their responsibilities with regard to the transport of dangerous goods, including action to be taken in the event of an emergency involving dangerous goods;
- b) information and instructions for other operating personnel, including ground handling personnel, as will enable them to carry out their responsibilities, including action to be taken in the event of an emergency involving dangerous goods.

Note.— *Guidance material on the development of policies and procedures for dealing with dangerous goods incidents on board aircraft is contained in Emergency Response Guidance for Aircraft Incidents Involving Dangerous Goods (Doc 9481).*

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2.4 Training

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2.4.4 Details of the dangerous goods training programme as required by Chapter 14, 14.2 or 14.3.

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APPENDIX 6. AIR OPERATOR CERTIFICATE (AOC)

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3. OPERATIONS SPECIFICATIONS FOR EACH AIRCRAFT MODEL

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OPERATIONS SPECIFICATIONS (subject to the approved conditions in the operations manual)				
...				
SPECIFIC APPROVAL	YES	NO	DESCRIPTION ⁹	REMARKS
Dangerous goods	<input type="checkbox"/>	<input type="checkbox"/>	<u>10</u>	
...				

...

9. List in this column the most permissive criteria for each specific approval (with appropriate criteria).

10. Describe any limitations on the types of dangerous goods the operator is approved to transport (see Attachment G for further guidance).

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ATTACHMENT B. AIR OPERATOR CERTIFICATION AND VALIDATION

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3. AUTHORIZATIONS

3.1 Specific approval actions

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3.1.2 The following provisions make explicit reference to the need for a specific approval:

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g) dangerous goods [14.31].

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3.3.2 Provisions that require an approval

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q) ~~Training in the transport of~~ Dangerous goods training programme (9.3.1 e), Notes 5 and 6; 12.4 e), Notes 1 and 2; 14);

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<i>Origin:</i>	<i>Rationale:</i>
DGP-WG/Annex 18	Update for consistency with requirement in Annex 18 for approval of the dangerous goods training programme.

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ATTACHMENT G. SPECIFIC APPROVAL FOR THE TRANSPORT DANGEROUS GOODS

Supplementary to Chapter 14

1. PURPOSE AND SCOPE

The material in this attachment provides guidance regarding the carriage of dangerous goods as cargo. Chapter 14, includes dangerous goods operational requirements that apply to all operators. Operators that have a specific approval to transport dangerous goods as cargo need to meet additional requirements. In addition to the operational requirements contained in Annex 6, there are other requirements in Annex 18 and the Technical Instructions that also need to be complied with.

2. DEFINITIONS

Where the following term is used in this attachment, it has the meaning indicated:

Cargo. Any property carried on an aircraft other than mail and accompanied or mishandled baggage.

Note 1.— This definition differs from the definition of “cargo” given in Annex 9—Facilitation.

Note 2.— COMAT that meets the classification criteria of dangerous goods and which is transported in accordance with Part 1;2.2.2 or Part 1;2.2.3 or Part 1;2.2.4 of the Technical Instructions are considered as “cargo” (e.g. aircraft parts such as chemical oxygen generators, fuel control units, fire extinguishers, oils, lubricants, cleaning products).

3. STATES

3.1 The State of the Operator should indicate in the operations specification if the operator has been issued a specific approval to transport dangerous goods as cargo. Any limitations should be included.

3.2 A specific approval may be granted for the transport of specific types of dangerous goods only (e.g. dry ice; biological substance, Category B; and dangerous goods in excepted quantities) or COMAT.

3.3 The Supplement to the Technical Instructions contains guidance on a State’s responsibilities with respect to operators.

This includes additional information to Part 7 of the Technical Instructions on storage and loading, provision of information, inspections, enforcement and Annex 6 information relevant to the State’s responsibilities for dangerous goods.

3.4 Carriage of dangerous goods other than as cargo (e.g. medical flights, search and rescue) are addressed in Part 1, Chapter 1, of the Technical Instructions. The exceptions for the carriage of dangerous goods that are either equipment or for use on board the aircraft during flight are detailed in Part 1, 2.2.1, of the Technical Instructions.

4. OPERATOR

4.1 The operator's training programme should cover, as a minimum, the aspects of the transport of dangerous goods listed in the Technical Instructions in Table 1-4 for operators holding a specific approval

~~or Table 1-5 for operators without a specific approval. Recurrent training must be provided within 24 months of previous training, except as otherwise provided by the Technical Instructions.~~

~~4.2 Details of the dangerous goods training programme including the policies and procedures regarding third party personnel involved in the acceptance, handling, loading and unloading of dangerous goods cargo should be included in the operations manual.~~

~~4.3 The Technical Instructions require that operators provide information in the operations manual and/or other appropriate manuals that will enable flight crews, other employees and ground handling agents to carry out their responsibilities with regard to the transport of dangerous goods and that initial training be conducted prior to performing a job function involving dangerous goods.~~

~~4.4 Operators should meet and maintain requirements established by the States in which operations are conducted in accordance with 4.2.2.3 of this Annex.~~

~~4.5 Operators may seek a specific approval to transport, as cargo, specific dangerous goods only, such as dry ice, biological substance, Category B, COMAT and dangerous goods in excepted quantities.~~

~~4.6 Attachment 1 to Part S-7, Chapter 7, of the Supplement to the Technical Instructions contains additional guidance and information on requirements regarding operators not holding a specific approval to transport dangerous goods as cargo and for operators that have a specific approval to transport dangerous goods as cargo.~~

~~4.7 All operators should develop and implement a system that ensures they will remain current with regulatory changes and updates. The Technical Instructions contain detailed instructions necessary for the safe transport of dangerous goods by air. These instructions are issued biennially, becoming effective on 1 January of an odd-numbered year.~~

The specific approval for the transport of dangerous goods should be granted based on the policies, operating procedures and training programmes of the operator. The specific approval may be granted without limitations and therefore permit all classes of dangerous goods in all circumstances permitted by the Technical Instructions. Alternatively, the approval may have limitations reflecting the specific needs of the operator. Examples of such limitations include:

- a) only permitting the transport of specific commodities such as dry ice
- b) restrictions on classes to be transported, for example 'Class 9 only' or 'All classes except Class 7 (radioactive material)'
- c) restrictions on the quantity and packing system applied, for example to permit or exclude dangerous goods in excepted quantities, limited quantities, etc.
- d) restrictions on the circumstances when dangerous goods are permitted for transport, for example to provide for or exclude the transport of dangerous goods of the operator, in mail, etc.
- e) differing restrictions may be applied in the operations specification of each aircraft model as identified by aircraft make, model and series to reflect the capabilities of specific aircraft, for example, passenger vs all cargo operations.

The State of the Operator should indicate in the operations specification if the operator has been issued a specific approval to transport dangerous goods as cargo. Any limitations should be included.

The transport of dangerous goods by operators not holding a specific approval (such as medical flights) are addressed in Part 1, Chapter 1, of the Technical Instructions. The exceptions for the carriage of dangerous goods that are either equipment or for use on board the aircraft during flight are detailed in Part 1, 2.2.1, of the Technical Instructions.

<i>Origin:</i>	<i>Rationale:</i>
DGP-WG/Annex 18	The current guidance is considered unnecessary for Annex 6 as it relates more to Annex 18 and will be captured in guidance to support implementation of dangerous goods provisions. The proposed new guidance is applicable to Annex 6.

Corresponding amendments to Parts III and
IV if the amendments to Part I are agreed

— END —