



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

**OFFSHORE HELICOPTER OPERATIONS INVOLVING ENVIRONMENTALLY AFFECTED
WILDLIFE AND REGULATORY CONSIDERATIONS FOR TRANSPORT**

(Presented by L. Cascardo)

SUMMARY

This working paper is presented as an initial discussion paper to raise regulatory awareness regarding the emergency transport of wildlife contaminated during offshore operations. Such situations may require urgent transport to onshore veterinary facilities following exposure to substances such as oil or petroleum products.

The paper seeks the views of the working group on whether such cases could be addressed under existing general exceptions or whether further clarification is warranted.

Action by the DGP-WG is in paragraph 3.

1. INTRODUCTION

1.1 Offshore helicopter operations supporting oil and gas platforms are conducted under stringent safety and environmental protection frameworks.

1.2 In rare accidental circumstances, wildlife (e.g. seabirds) may become contaminated with small quantities of substances such as oil or petroleum products. In such cases, immediate transport to onshore veterinary facilities may be required to support survival and environmental response efforts.

1.3 These operations are conducted under emergency conditions, where time-sensitive intervention is critical to mitigate environmental and animal welfare impacts.

2. DISCUSSION

2.1 The Technical Instructions include specific provisions for the transport of infected live animals under 2;6.3.6.1. However, these provisions apply exclusively to cases involving infectious substances and intentionally infected animals transported under approval.

2.2 The situations addressed in this paper differ in nature, as they do not involve infectious substances. Instead, the animals may be externally or internally contaminated with substances classified under other dangerous goods entries, such as petroleum-based products under different UN numbers.

2.3 As a result, such cases do not fall within the scope of the provisions for infected live animals, nor do they appear to be explicitly addressed elsewhere in the Technical Instructions. This may result in uncertainty regarding the applicable regulatory framework for urgent transport operations of this nature.

2.4 In practice, the absence of a specific provision may lead to the application of the full regulatory requirements for dangerous goods transport, including documentation, packaging, marking, and labelling provisions, which are not compatible with emergency wildlife response scenarios.

2.5 These operations are primarily conducted for environmental protection and biodiversity preservation purposes. In this regard, they are aligned with United Nations Sustainable Development Goals, in particular SDG 14 (Life Below Water) and SDG 15 (Life on Land), which promote the conservation of marine and terrestrial ecosystems.

2.6 The intent of this working paper is to seek the views of the working group on whether such situations could be addressed under existing general exceptions provisions or whether further regulatory clarification or guidance would be beneficial.

3. ACTION BY THE DGP-WG

3.1 The DGP-WG is invited to discuss the issues raised in this paper and provide views on whether emergency transport of wildlife contaminated during offshore operations could be considered under existing general exceptions or whether further clarification within the Technical Instructions would be appropriate.

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