



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

RECOGNITION OF CERTIFIED DIGITAL SIGNATURES IN THE TRANSPORT DOCUMENT

(Presented by L. Cascardo)

SUMMARY

The current provisions in Part 5;4.1.6.1 of the Technical Instructions recognize the use of facsimile signatures where legally valid. However, with the advancement of technology, many States have adopted certified digital signature systems that provide a higher level of security, traceability, and legal validity. This paper proposes updating the text to explicitly recognize certified digital signatures, ensuring alignment with modern practices and national legal frameworks.

Action by the DGP-WG is in paragraph 3.

1. INTRODUCTION

1.1 Part 5;4.1.6.1 of the Technical Instructions requires that the dangerous goods transport document be signed and dated by the shipper and currently states:

“... Facsimile signatures are acceptable where applicable laws and regulations recognize the legal validity of facsimile signatures.”

1.2 This provision reflects the text contained in the UN Model Regulations and has remained largely unchanged for a considerable period of time. It was developed at a time when facsimile (scanned or reproduced) signatures represented a practical alternative to handwritten signatures.

1.3 Since then, technological advancements have taken place, and many States have implemented legally recognized certified digital signature systems, which provide enhanced authentication, integrity, and non-repudiation compared to facsimile signatures.

2. DISCUSSION

2.1 Certified digital signatures, also referred to in some jurisdictions as qualified electronic signatures, are now widely used in official documentation and are supported by national legal frameworks in many States. These systems rely on secure digital certificates issued by recognized authorities and provide a higher level of assurance than facsimile signatures, particularly in terms of verifying the identity of the signatory, ensuring the integrity of the document, and enabling traceability.

2.2 Despite these developments, it has been observed that some operators continue to apply the existing provisions of the Technical Instructions strictly as written and, as a result, do not accept dangerous goods transport documents signed using certified digital signatures, even in cases where such signatures are legally recognized within the States involved in the transport.

2.3 This situation has created operational challenges and, in some cases, inconsistencies between the Technical Instructions and national legal frameworks that explicitly recognize the validity of certified digital signatures. As a result, shippers may face difficulties in using modern, legally accepted digital processes, leading to inefficiencies and potential regulatory conflicts.

2.4 While Part 5;4.1.6.2 of the Technical Instructions already allows for the use of electronic signatures in the context of electronic data processing (EDP) or electronic data interchange (EDI) transmission techniques, the explicit reference in 4.1.6.1 remains limited to facsimile signatures. This may create ambiguity regarding the acceptability of certified digital signatures, particularly in situations where documentation is generated, signed, and retained digitally, or subsequently printed.

2.5 Considering that the relevant provision originates from the UN Model Regulations, any amendment to explicitly recognize certified digital signatures would likely require coordination at the UN level to ensure global harmonization.

2.6 In this context, it is considered important to first gather the views of the Dangerous Goods Panel (DGP) on this issue, including whether there is support for exploring possible amendments and for bringing the matter to the attention of the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods.

3. ACTION BY THE DGP-WG

3.1 The DGP-WG is invited to discuss the proposed amendment presented in the appendix to this working paper.

3.2 The proposed text is provided solely to support the discussion and is not intended for approval at this stage, as any amendment would need to be considered by the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods prior to further action.

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APPENDIX

PROPOSED AMENDMENT TO THE TECHNICAL INSTRUCTION

Part 5

SHIPPER'S RESPONSIBILITIES

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Chapter 4

DOCUMENTATION

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4.1.6 Certification

4.1.6.1 The dangerous goods transport document must include a certification or declaration that the consignment is acceptable for transport and that the goods are properly packaged, marked and labelled, and in proper condition for transport in accordance with the applicable regulations and including additional air transport requirements of these Instructions (examples of additional air transport requirements are indicated in 5;1.1).
The text for this certification is:

"I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations."

For air transport the following additional statement is required:

"I declare that all of the applicable air transport requirements have been met."

The certification must be signed and dated by the shipper. Facsimile signatures and certified digital signatures are acceptable where applicable laws and regulations recognize the ir legal validity ~~of facsimile signatures~~.

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