



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

**PROPOSED AMENDMENT TO THE TECHNICAL INSTRUCTIONS FOR ADDITIONAL
PERSONS TO BE ALLOWED ON CARGO AIRCRAFT**

(Presented by D. Schlichting)

SUMMARY

This working paper proposes to amend when “cargo aircraft only” cargo may be loaded on an aircraft that has personnel in addition to those personnel stipulated in the definition of cargo aircraft on board. The wording proposed in this working paper is the wording to amend the Technical Instructions that was crafted during the thirtieth meeting of the Dangerous Goods Panel (DGP/30) when this amendment was last proposed. The working paper proposes to add wording to allow “cargo aircraft only” cargo to be on the aircraft with these additional personnel in accordance with the requirements specified by the State of the Operator, and the requirements of *Annex 6 – Operation of Aircraft*.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 This proposal is a restatement of the language that had been crafted at the thirtieth meeting of the Dangerous Goods Panel (DGP/30, 6 to 10 October 2025) following discussions of a proposal to amend the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) to address inconsistencies among States in determining who may be on board a cargo aircraft carrying dangerous goods not permitted on a passenger aircraft (see paragraph 8.2 of the DGP/30 Report). A revised amendment was developed during the meeting to address feedback from the panel. However, it was decided that it should be coordinated with the Flight Operations Panel (FLTOSP) first, as it was felt that it could be interpreted as a statement regarding personnel that would be allowed on an aircraft (see paragraph 8.2 of the DGP/30 Report).

1.2 The proposal at DGP/30 was based on discussions at the twenty-ninth meeting of the Dangerous Goods Panel (DGP/29, 13 to 17 November 2023) (see paragraph 9.3 of the DGP/29 report) and at the Dangerous Goods Panel Working Group Meetings in 2024 (DGP-WG/24, 21 to 25 October 2024, Montreal) and 2025 (DGP-WG/25, 21 to 25 April 2025, Delhi, India) (see paragraphs 4.8.2 of the DGP-WG/24 Report and 4.3.3 of the DGP-WG/25 Report). Additionally, that proposal benefitted from input through discussions with panel members and advisors, and from a review by flight operations experts within the Secretariat

1.3 The amendments to the Technical Instructions proposed at prior meetings were to address inconsistencies with how the definitions for passenger aircraft and cargo aircraft were applied internationally when determining who could be on board a cargo aircraft carrying “cargo aircraft only” (CAO) dangerous goods. However, flight operations experts and the Air Navigation Commission (ANC) opposed previous proposals because they felt that the language was trying to dictate who could be on board an aircraft. Previous authors of similar efforts to amend the language had attempted to solve this issue through an amendment to the definition in *Annex 18 — The Safe Transport of Dangerous Goods by Air*, but the ANC responded that definitions were included in Annexes to assist in the interpretation of terms used but were not in themselves regulatory text.

1.4 Additionally, the ANC felt that amending the definition in Annex 18 to the Technical Instructions was inappropriate as they felt that the determination of who could be on an aircraft was an operational issue under Annex 6 — *Operation of Aircraft*. However, the original proposal presented to DGP/30, revisions to it to address feedback from the panel and language that is presented in the appendix to this working paper does not determine which persons would be allowed on an aircraft, but rather what cargo would be allowed on an aircraft depending upon which personnel were aboard. The language supported during the working sessions at DGP/30, and presented here, is careful to preserve this distinction.

1.5 This topic was addressed with members of the FLTOPSP through the DGP/FLTOPSP inter-panel working group established to address consequential amendments to Annex 6 as a result of the Annex 18 amendment. The discussions determined that since the proposed language was not stipulating who could be on an aircraft, that it did not need to be addressed in Annex 6. The proposal was remanded back to the DGP for further consideration toward adoption.

1.6 This proposal does not create a conflict with Annex 18 as the definitions for “cargo aircraft” and “passenger aircraft” have already been recommended for removal from Annex 18 since they are not used anywhere within the Annex. This removal was agreed by the full panel at DGP/29, and confirmed again at DGP/30. It was also previously noted that the terms do not appear in Annex 6, as that Annex only references passenger operations and cargo operations, and not in a manner that would not create a conflict with the amended language proposed here. It is recommended that the definitions remain in the Technical Instructions as they are central to the interpretation of Table 3-1.

1.7 The approach agreed upon at DGP/30 while crafting this proposed language was to follow the approach already used for approvals and exemptions. Part 1; 1.1.1 states that the Technical Instructions “...prescribe the detailed requirements applicable to the international civil transport of dangerous goods by air by any aircraft.” This is followed by 1.1.2 which stipulates the ability to grant an approval, and 1.1.3 which stipulates the ability to grant an exemption, beyond the provisions stated in the Technical Instructions. The proposal here is to follow the same process to allow a State to grant the ability for additional personnel to be on board an aircraft and have it remain a cargo aircraft.

1.8 It is also important to restate the inclusion of the first sentence in the proposed text. A number of panel members were sympathetic to the original proposal at DGP/30, but had concerns with “cargo aircraft only” cargo winding up on a passenger aircraft. They had noted that the discussion of “cargo aircraft only” cargo in Part 7; 2.4.1 discussed how “cargo aircraft only” cargo is loaded onto a cargo aircraft, but doesn’t clearly state that “cargo aircraft only” cargo is forbidden from being loaded on a passenger aircraft. The inclusion of the first sentence in the proposed text was agreed as a compromise to ensure that prohibition was clearly stated.

1.9 Currently, the State of the Operator is responsible for developing various requirements for passenger flights, such as the minimum number of flight attendants and their training standards, various aspects of required emergency equipment, and operational limitations, such as when portable electronic devices may be used. Some of these requirements are normally not applicable to cargo flights (such as provisions relating to flight attendants), but alternative means of ensuring adequate levels of safety for non-flight crew on board cargo aircraft can be established in accordance with existing provisions in Annex 6. The purpose of the proposed wording in the appendix to this working paper is to allow the State of the Operator to determine when “cargo aircraft only” dangerous goods can be on board an aircraft with personnel in addition to crew members if the applicable requirements of Annex 6 are met. The stipulation of this requirement in the language is something that the ANC requested be included after a previous proposal to amend the language.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to agree to amend the language in the Technical Instructions as presented in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO THE TECHNICAL INSTRUCTIONS

Part 7

OPERATOR'S RESPONSIBILITIES

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Chapter 2

STORAGE, LOADING AND STOWAGE

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2.4 LOADING AND SECURING OF DANGEROUS GOODS

2.4.1 Loading of cargo aircraft

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2.4.1.3 Dangerous goods which are required to bear the "Cargo aircraft only" label must not be carried on board a passenger aircraft. Notwithstanding the definitions in 1:3.1 of these Instructions, an aircraft must remain a cargo aircraft with additional persons onboard that are authorized by the operator; in accordance with the requirements specified by the State of the Operator; and in accordance with the relevant provisions of Annex 6.

— END —