



DANGEROUS GOODS PANEL (DGP) WORKING GROUP MEETING (DGP-WG/25)

Delhi, India, 21 to 25 April 2025

**Agenda Item 6: Dangerous goods provisions to support RPAS operations (Ref: Job Card
DGP.007.02)**

DANGEROUS GOODS PROVISIONS TO SUPPORT REMOTELY PILOTED AIRCRAFT SYSTEMS – GUIDANCE FOR THE CARRIAGE OF DANGEROUS GOODS TRANSPORTED BY UNMANNED AIRCRAFT EXTRACTED FROM ICAO ADVISORY CIRCULAR AC 102 37 ASSOCIATED WITH PART 102 OF THE ICAO MODEL UAS REGULATIONS

(Presented by the Rapporteur of the DGP-WG Dangerous Goods Provisions to
Support RPAS Operations – M. Ranito)

SUMMARY

This information paper presents guidance extracted from ICAO Advisory Circular AC-102-37 associated with Part 102 of the ICAO Model UAS Regulations published by ICAO in January 2020 to support States in the development of national regulations for the carriage of dangerous goods by UAS.

1. INTRODUCTION

1.1 The ICAO Model Unmanned Aircraft Systems (UAS) Regulations were published as an example that Member States could consider for implementation to regulate the operation of UAS. They are a compilation drawn from current UAS regulations which were at the time in effect in various States.

1.2 The UAS Model Regulations contain definitions related to unmanned aircraft (UA), which in essence includes remotely piloted aircraft (RPA). In other words, an RPA is by terms of the definition an unmanned aircraft. However, it should be noted that not all UA will be remotely piloted.

1.3 Subpart D, Rule 102.23 of the UAS Model Regulations relates to the requirements of an application for a UAS authorization or UAS operator certificate, which requires an operator to establish

procedures for handling cargo, including dangerous goods, or dropping of items, if such operations are intended.

1.4 In support of Rule 102.23, ICAO published Advisory Circular 102-37 which addresses specifically the carriage of dangerous goods. It is included in the appendix to this information paper.

**2. WORK OF THE DGP WORKING GROUP ON
REMOTELY PILOTED AIRCRAFT SYSTEMS
(DGP-WG/RPAS)**

2.1 During the work conducted by the DGP Working Group on Remotely Piloted Aircraft Systems (DGP-WG/RPAS), it was agreed that the information contained in AC 102-37 could be used as guidance material to be published in the Supplement to the Technical Instructions.

2.2 Additionally, an invitation was made to all members participating in the working group to offer any further guidance material that may have been domestically developed or published within their States to support the carriage of dangerous goods by RPAS.

3. CONCLUSION

3.1 The DGP-WG is invited to consider if the information contained in the appendix of this information paper may be adopted in principle as guidance material to support provisions for the carriage of dangerous goods by RPAS.

APPENDIX

ADVISORY CIRCULAR (AC) 102-37 UNMANNED AIRCRAFT SYSTEMS (UAS) CARRYING DANGEROUS GOODS

DESCRIPTION

This Advisory Circular (AC) was developed for ICAO Member States and interested stakeholders and provides guidance associated with the ICAO Model UAS Regulations [[Part 102]] regarding unmanned aircraft systems (UAS) operations in the Specific category. It may assist Civil Aviation Authority (CAA) personnel in the implementation and oversight of UAS operations that carry hazardous goods. Throughout this AC, information enclosed by brackets “[]” indicate items that CAAs may need to align with existing CAA regulatory references.

An AC provides information and guidance by describing an acceptable means, but not the only means, of demonstrating compliance with the regulations and standards. An AC does not change, create, amend or permit deviations from regulatory requirements nor does it establish minimum standards. This AC serves as guidance for consideration by ICAO member States to create, add, or amend, future or existing guidance material developed by the CAA.

This AC, the ICAO Model UAS Regulations and the accompanying ACs and guidance material are available for download on ICAO’s public website: <https://www.icao.int/safety/UA/>. The documents on the website are intended to be living documents and are subject to change without notice.

[Advisory Circular (AC) 102-37]

Unmanned Aircraft Systems (UAS) Carrying Dangerous Goods

General

Civil Aviation Authority (CAA) Advisory Circulars (AC) contains information advisory in nature to provide guidance about standards, practices, and procedures resulting from rules promulgated by the CAA. This AC is not mandatory and does not constitute a regulation. This AC does not change, add to, or delete regulatory requirements or authorize deviations from regulatory requirements.

Purpose

This advisory circular provides advice on best practice to be observed when operating unmanned aircraft (UA) transporting dangerous goods, Rule [102.23].

This AC is not intended to cover every provision of [Part 102]. Rather, this AC is intended to provide guidance on this provision where additional information may be helpful. Persons subject to [Part 102] are responsible for complying with every applicable provision of [Part 102], regardless of whether the provision is discussed in this AC.

Related Rules

This advisory circular relates specifically to Civil Aviation Rule [Part 102.23(11)].

Change Notice

This document is the initial issue of this advisory circular. June 23, 2020.

Table of Contents

Dangerous Goods.....	A-4
Dangerous Goods: Understanding the Risks and the Responsibilities	A-4
APPENDIX 1.....	A-7
Classes and Divisions of Dangerous Goods	A-7
APPENDIX 2.....	A-8
Examples of Dangerous Goods that may, potentially, be carried on UA.....	A-8
APPENDIX 3.....	A-9
UA Operator's	A-9
Dangerous Goods Standard Operating Procedures (DG-SOP).....	A-9
Manual for Safe Transport.....	A-9
APPENDIX 4.....	A-11
Elements to consider as Part of the UA Operator's Safety.....	A-11
Risk Management Procedures	A-11
APPENDIX 5.....	A-133
References	A-13

Dangerous Goods: Understanding the Risks and the Responsibilities

Introduction

Unmanned Aircraft (UA) are being used to transport goods. Some of these goods have one or more inherent hazards and are therefore classified as dangerous goods. ICAO develops international Standards and Recommended Practices (SARPs) which govern the safe transport of dangerous goods on civil aircraft. Most States adopt these Standards into their national legislation for both international and domestic operations. There may be circumstances when full compliance with these SARPs is inappropriate or unnecessary for UA operations. Conversely, there may be hazards unique to UA operations that are not addressed by these SARPs. The State of the Operator should ensure that both are taken into account before approving transport operations involving the carriage of dangerous goods on UA. Likewise, the State where operations occur, if different, should review the approval issued by the State of the Operator. See Appendix 2 for examples of dangerous goods that may, potentially, be carried.

Scope

This guidance applies to circumstances when a State has determined that the use of UA to transport dangerous goods is appropriate. If delivery of dangerous goods to or from the location of the UA by other modes of transport is necessary, all appropriate provisions of the national or international regulations by those modes of transport apply.

Regulatory Requirements for the International Transport of Dangerous Goods by Air on Civil Aircraft

The broad principles governing the international transport of dangerous goods by air are contained in Annex 18 to the Convention on International Civil Aviation — *The Safe Transport of Dangerous Goods by Air*. These broad provisions are amplified by detailed specifications contained in the *Technical Instructions for the Safe Transport of Dangerous Goods by Air (Technical Instructions, Doc 9284)*. States are obliged to take the necessary measures to achieve compliance with these documents for international civil aircraft operations and are encouraged to do the same for domestic civil aircraft operations.

Dangerous Goods — Description

Dangerous goods are articles or substances that are capable of posing a hazard to health, safety, property or the environment and which are shown in the list of dangerous goods (Table 3-1) provided in the Technical Instructions or which are classified according to Part 2 of the Technical Instructions. Dangerous goods are classified according to nine classes based on their potential consequences. Some classes are further divided into divisions. Dangerous goods can have two or more potential consequences. Identifying dangerous goods is the first step towards safely transporting them. Based on this, the safety risks posed can be reduced through proper packaging, communication, handling, and stowage. The scope of dangerous goods needed for carriage aboard UA may be limited to specific items and classes. The operator should identify these items and classes in their safety risk assessment. Dangerous goods classes and divisions are outlined in Appendix 1.

Transport of Dangerous Goods on UA

To the extent possible, the full scope of Annex 18 and the Technical Instructions should be complied with when transporting dangerous goods on UA. However, there may be circumstances when the full provisions of the Technical Instructions are not appropriate or necessary, due to the nature of UA operations. When appropriate, the State of the Operator may grant an approval to permit the carriage of dangerous goods without complying with the requirements of the Technical Instructions, provided they are satisfied with the

operator's safety risk assessment and that the operator has made reasonable effort to identify all hazards and that the safety risks associated with the foreseeable consequences have been mitigated to an acceptable level. There may be hazards unique to UA operations that are not addressed in the Technical Instructions. The CAA should ensure these hazards are also addressed through the operator's safety risk assessment.

Dangerous Goods Standard Operating Procedures

The State of the Operator, when granting an operator approval for carriage of dangerous goods, must ensure that the operator establishes standard operating procedures (DG-SOP) for the safe transport of dangerous goods on the UA, including the conduct of a specific safety risk assessment. If operations are conducted in other than the State of the Operator, the CAA where the operations occur must determine if the SOP are acceptable.

The extent of the DG-SOP will depend on the size of the organization, the nature of the operation and on the level of safety risk. At a minimum, the DG-SOP should include:

- a) how to conduct a safety risk assessment; procedures to identify hazards, determine their potential consequences and ensure the risk can be managed to an acceptable level;
- b) a training program and the level of competency achieved once training is completed; providing adequate instruction ensures that individuals handling dangerous goods are competent to perform the function commensurate with their responsibilities taking into account the level of safety risk;
- c) instructions for communicating information to relevant persons related to the dangerous goods being transported in case of an accident or incident;
- d) action to be taken in the event of emergencies involving dangerous goods; and
- e) instructions for the collection of safety data related to dangerous goods accidents and dangerous goods incidents.

Appendix 3 to this document provides further guidance on elements that should be included in the SOP.

The safety risk assessment should include at least the:

- a) identification of hazards associated with the dangerous goods;
- b) type of operation;
- c) containment characteristics of the UA;
- d) packing and packaging;
- e) quantity and type of dangerous goods to be transported; and
- f) level of competence of those handling the dangerous goods.

Appendix 4 provides further guidance on elements that should be considered as part of a specific safety risk assessment for the carriage of dangerous goods by UA.

Note.— The Safety Management Manual (SMM) (Doc 9859, 4th edition) contains general guidance on implementation of Annex 19 — Safety Management, including the conduct of safety risk assessments. A new manual entitled Guidance for Safe Operations Involving Aeroplane Cargo Compartments (Doc 10102) provides guidance on specific safety risk assessments on the transport of items in the cargo compartments of an aeroplane, including dangerous goods, which may be useful for UA operations.

APPENDIX 1**Classes and Divisions of Dangerous Goods**

The following classes and divisions are used to identify hazards associated with the transport of articles and substances by all modes of transport based on the product's specific chemical and physical properties. They are named in accordance with the United Nations Recommendations Transport of Dangerous Goods (Model Regulations). The classification of an article or substance for transport by air needs to be done by competently-trained individuals in accordance with the Technical Instructions. A good starting point for determining if your product might be dangerous is by obtaining a Safety Data Sheet (SDS) from the manufacturer and checking the "Transportation Information." This can provide valuable information on the transport risks related to your materials.

The numerical order of the classes and divisions is not that of the degree of danger.

Class 1: Explosives

Division 1.1: Substances and articles which have a mass explosion hazard

Division 1.2: Substances and articles which have a projection hazard but not a mass explosion hazard

Division 1.3: Substances and articles which have a fire hazard and either a minor blast hazard or a minor projection hazard or both, but not a mass explosion hazard

Division 1.4: Substances and articles which present no significant hazard

Division 1.5: Very insensitive substances which have a mass explosion hazard

Division 1.6: Extremely insensitive articles which do not have a mass explosion hazard

Class 2: Gases

Division 2.1: Flammable gases

Division 2.2: Non-flammable, non-toxic gases

Division 2.3: Toxic gases

Class 3: Flammable liquids

Class 4: Flammable solids; substances liable to spontaneous combustion; substances which, on contact with water, emit flammable gases

Division 4.1: Flammable solids, self-reactive and related substances and solid desensitized explosives and polymerizing substances

Division 4.2: Substances liable to spontaneous combustion

Division 4.3: Substances which, in contact with water, emit flammable gases

Class 5: Oxidizing substances and organic peroxides

Division 5.1: Oxidizing substances

Division 5.2: Organic peroxides

Class 6: Toxic and infectious substances

Division 6.1: Toxic substances

Division 6.2: Infectious substances

Class 7: Radioactive material**Class 8: Corrosive substances**

Class 9: Miscellaneous dangerous substances and articles, including environmentally hazardous substances

APPENDIX 2

Examples of Dangerous Goods that may, potentially, be carried on UA

The following are examples of dangerous goods that might be transported by UA:

- a) compressed gases such as aerosols and gas cartridges;
- b) flammable liquids, such as ethanol, ether;
- c) sterilization materials such as ethylene oxide;
- d) infectious substances such as samples for analysis;
- e) toxic substances such as certain medicines;
- f) first aid kits;
- g) medical or clinical waste such as used needles and blood samples;
- h) safety devices;
- i) lithium batteries; and
- j) dry ice.

This list is not exhaustive. Provisions for identifying and classifying dangerous goods are contained in the Technical Instructions.

APPENDIX 3**UA Operator's
Dangerous Goods Standard Operating Procedures (DG-SOP)
Manual for Safe Transport**

This guidance provides recommended elements to be included in the UA operator's standard operating procedures manual for the transport of dangerous goods (DG-SOP).

Policy for the Safe Transport of Dangerous Goods on UA

The operator should establish a policy for the safe transport of dangerous goods on UA. The policy should include the practice of conducting a safety risk assessment.

***Procedures for Carrying Out Responsibilities Including Mitigation
Measures to Proactively Manage Risks***

The DG-SOP should include measures taken and an indication of how these measures mitigate the potential consequences of identified hazards to an acceptable level. Procedures to mitigate hazards unique to UA operations should also be included to ensure the dangerous goods are capable of withstanding the normal conditions of transport involving the type of UA being used.

Training Program

A training program should be established based on the functions performed by persons who handle dangerous goods. The program should be clear as to the competency level achieved once training is completed. A record reflecting the training and the competence level attained for each person should be maintained.

***Instructions for Communicating Information Related to the Dangerous Goods
Carried by the UA in the Case of an Incident or Accident***

The Technical Instructions include provisions for communicating hazards of dangerous goods through marking and labelling of the package and documentation, which are well-known to those involved in their transport. Individuals who are exposed to UAs involved in an incident or accident may not be aware of these hazard communication methods. Procedures should be established by the operator that explains the instructions for effectively communicating hazards to those not familiar with dangerous goods marking and labelling and how the instructions should be attached to the shipment. Contact information and instructions for informing appropriate authorities, including public health authorities, should also be included in the procedures.

Action to be Taken in the Event of Emergencies Involving Dangerous Goods

Procedures should be established for an emergency response plan for dangerous goods incidents or dangerous goods accidents. A current list of contacts indicating whom should be notified if either event occurs, should be maintained.

Instructions for Collection of Safety Data

Procedures should include instructions for collecting safety data related to dangerous goods accidents and dangerous goods incidents. The CAA may provide a format for submitting this data.

APPENDIX 4

Elements to consider as Part of the UA Operator's Safety Risk Management Procedures

A safety risk assessment should be performed to address potential consequences of identified hazards and associated mitigations should an unintentional release occur. The following are elements that should be included, at a minimum, in the safety risk assessment.

Risks Associated With Dangerous Goods

Risks associated with the dangerous goods to be transported should be considered in relation to the consequence of their effect if they are released.

- Infectious substances that are capable of causing permanent disability, life-threatening or fatal disease for which no vaccine or cure is available have the highest consequences. They could potentially affect multiple persons or animals.
- Infectious pathogens that are spread by ingestion, for which prophylactic treatment or a cure is available will have moderate consequences.
- Non-communicable pathogens for which prophylactic treatment or a cure is available will have a low consequence.
- Chemicals with high toxicity to human, animal and aquatic life will have the highest consequences, and may affect multiple persons or animals.
- Chemicals that are highly corrosive will have a high consequence to package handlers or receivers.

Type of Operation

The safety risk assessment should consider the potential consequences related to the transport over populated areas, remote areas or environmentally sensitive land and waters. Other normal flight risks such as those associated with operating routes, obstacles, altitudes, or take-off and landing areas should also be considered. Dropping of the dangerous goods from the UA also brings with it additional potential consequences for consideration.

Containment Characteristics of the UA (e.g. inside or outside the UA)

The carriage of the dangerous goods inside or outside the UA needs assessing. The securing of the dangerous goods within the UA, by attachment directly to the UA or slung from the UA, will have varying levels of risk.

Packing and Packaging

Packaging methods used to contain dangerous goods may affect the likelihood of damage, leakages, spills or unintentional release of contents. In considering the packing and packaging requirements for dangerous goods, the provisions of the Technical Instructions should be followed to the extent possible.

If the provisions of the Technical Instructions cannot be followed, an equivalent or greater level of safety should be established in accordance with the level of risk. At a minimum, the following should be taken into account:

- a) The type of packaging should take into account the containment characteristics of the UA and damage that could be caused by exposure to airflow and weather such as rain or snow. The effects of temperature and pressure variations and vibrations which may be encountered during transport should be taken into account.
- b) Generally, dangerous goods should be packed in the lowest volume container necessary for the intended purpose.
- c) Measures to prevent leakage of liquid dangerous goods need to be taken into consideration. At a minimum, the packaging should include a leak proof liner or bag containing the dangerous goods surrounded by absorbent material and placed into a receptacle in a rigid outer packaging. Inner packaging should be packed so that the closures are upward within the package. Closures on inner packaging must be leak proof and secured against loosening. Stoppers, corks or other such friction closures must be held in place by positive means.
- d) The contents of the packages should be documented and easily accessible in case of an incident or accident requiring emergency response. At a minimum, the UN number, container type, volume and number of items should be documented. In the case of biological substances, pathogen data sheets or information about the hazards to infectious substances, including deactivation and waste disposal, should be made available.
- e) If the dangerous goods are to be dropped by the UA, additional consideration of the effects on the dangerous goods and packaging materials should be considered due to the forces and shocks encountered.

Quantity and Distribution of Dangerous Goods to be Transported

The volume of dangerous goods to be carried coupled with packaging methods used may affect the likelihood of damage, leakages, spills or unintentional release of contents. For certain dangerous goods, the quantities may influence the severity of the identified consequence of a hazard. The potential for incompatible dangerous goods or non-dangerous goods to react dangerously when mixed needs to be taken into account.

Level of Competence of Those Handling the Dangerous Goods

The level of competence of those handling the dangerous goods needs to be taken into account in relation to the level of responsibility and risk. Without appropriately qualified personnel, there is the potential of insufficiently implementing mitigating strategies or potentially introducing additional hazards or unintended consequences.

APPENDIX 5**References**

1. International Civil Aviation Organization (ICAO). National Authority for Dangerous Goods Transport by Air. In: ICAO Dangerous Goods Annex 18.
<https://www.icao.int/safety/DangerousGoods/Pages/Dangerous-Goods-National-Authority.aspx>
2. International Civil Aviation Organization. Technical Instructions for the Safe Transport of Dangerous Goods by Air, 2019-2020, DOC 9284.
<https://store.icao.int/collections/dangerous-goods>
3. International Air Transportation Association (IATA). 2019. Dangerous Goods Regulations; 60th Edition.
<https://www.iata.org/publications/dgr/>
4. United Nations. (2017) UN Recommendations on the Transport of Dangerous Goods - Model Regulations. Twenty-first revised edition.
http://www.unece.org/trans/danger/publi/unrec/rev21/21files_e.html
5. World Health Organization (WHOWHE/CPI/2019.20), Guidance on Regulations for the Transport of infectious substances 2019-2020,
https://www.who.int/csr/resources/publications/biosafety/WHO_EM_C_97_3_EN/en/
6. U.S. Department of Health and Human Services, Biosafety in Microbiological and Biomedical Laboratories (BMBL), 2009.
<https://www.cdc.gov/labs/pdf/CDC-BiosafetyMicrobiologicalBiomedicalLaboratories-2009-P.PDF>

— END —