



**WORKING PAPER**

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

**Delhi, India, 21 to 25 April 2025**

- Agenda Item 2: Managing air-specific safety risks and identifying anomalies (REC-A-DGS-2027)**  
**Agenda Item 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 2027-2028 Edition**

**CHALLENGES IN THE SUPPLY CHAIN FOR AIR TRANSPORT OF DANGEROUS GOODS**

(Presented by T. Muller)

**SUMMARY**

Over the past two decades the supply chain has undergone significant transformation. Traditionally, manufacturers took full responsibility for dangerous goods consignments. Today, logistic providers assume full compliance responsibility, often extending into areas traditionally managed by the manufacturer such as classification, identification of dangerous goods and filling of (inner) packagings. As manufacturers increasingly seem to neglect these responsibilities, shortcomings and non-compliances with the Technical Instructions are becoming more prevalent.

Action by the DGP-WG is in paragraph 2.

**1. INTRODUCTION**

1.1 The transport of dangerous goods by air poses significant challenges for manufacturers, logistics providers and regulatory authorities. Over the past two decades the supply chain has undergone significant transformation. Traditionally, manufacturers took full responsibility for dangerous goods consignments including classification, identification, packing, marking, labelling and documentation. Today logistic providers acting as shippers often assume full legal responsibility for compliance by completing and signing the dangerous goods transport document. Gaps in contractual obligations between the original manufacturer and the logistics provider, along with missing or incorrect information and documents necessary to perform the tasks as shipper as well deficiencies in training requirements create inefficiencies throughout the whole supply chain and risks in the transport of dangerous goods by air. The following paragraphs highlight the most significant shortcomings and challenges.

1.2 The logistics provider assumes full compliance responsibility, often extending into areas traditionally managed by the manufacturer, such as dangerous goods classification and identification, and the filling of (inner) packagings including compliance with compatibility requirements, pressure differential requirements etc. While contracts could partially help to mitigate these issues by clearly defining responsibilities of all participants in the transport chain, this practice is not widespread and does not assure full compliance with the regulations. Additionally, the required information to assign a classification is not always made available to the logistic provider or is incorrect. Furthermore, crucial details on the (inner) packagings along with supporting documentation such as test reports of packagings and user instructions, are frequently missing.

1.3 With outsourcing the tasks of preparing and offering dangerous goods consignments for transport to third parties, manufacturers seem to neglect the fact that classification, identification, correctness/choice of packing materials and the filling of receptacles remain within their domain and responsibilities. As a result, manufacturers believe little or no training for the tasks they perform is needed, assuming that the logistic provider bears full responsibility by completing and signing the dangerous goods transport document. The lack of training can lead to errors, increasing the risk of non-compliance throughout the transport chain.

1.4 The absence of a knowledgeable spokesperson at the manufacturer's side may result in miscommunication and difficulties for the logistics providers in obtaining all the required information to ensure full compliance. The appointment of a person responsible for dangerous goods by the manufacturer would facilitate the communication between the different stakeholders involved and increase the safety of the supply chain.

1.5 The Technical Instructions do not define "shipper". They only specify in Part 5 the responsibilities of the shipper. Although these responsibilities are generally fulfilled by different persons and/or different companies the perception of the industry is, despite the introduction of the competency-based training, that the person who signs the transport document for dangerous goods is the only one who must be fully trained as that person confirms full compliance with the Technical Instructions. However, reality has shown that in many cases the person who is signing the document does sign only based on blind trust but not on evidence. The absence of clear guidance and mandatory requirements for other parties involved such as the persons responsible for classifying or other specific tasks such as packing/filling creates a lot of gaps in the supply chain.

1.6 The ADR regulations applicable to road transport provide more detailed information on the tasks, safety obligations and responsibilities of the different participants in the transport of dangerous goods: e.g. packer, filler, consignor (= shipper) including responsibilities of third parties involved. Moreover, each undertaking involved in consigning dangerous goods or in another activity such as packing, must appoint a safety advisor. Within the limits of the relevant activities of the undertaking, the safety advisor must monitor compliance with the requirements of the transport regulations and advise the undertaking on the transport of dangerous goods. The appointment of a person responsible for dangerous goods in air transport in every undertaking involved in one or more activities related to the transport of dangerous goods could help to bridge the gap between the manufacturers and logistic providers.

## 2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to discuss and comment on the following topics:

- a) Is the working group of the opinion that the issues raised should be clarified in the Technical Instructions and that more guidance is required related to the

responsibilities (including provision of relevant information and documents) and training requirements for manufacturers and undertakings using a third party fulfilling the role of shipper?

- b) Is the working group of the opinion that the introduction of the obligation to appoint a DG responsible (cf. ADR Safety Advisor) would close the gaps in the transport of dangerous goods and would be beneficial to enhance the safety in the supply chain?

2.2 Depending on the outcome of the discussions, a working paper with proposals to amend the Technical Instructions will be prepared for DGP/30.

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