



WORKING PAPER

ASSEMBLY — 42ND SESSION

EXECUTIVE COMMITTEE

Agenda Item 14: Audit Programmes – Continuous Monitoring Approach

**PROPOSAL TO RECOGNIZE DANGEROUS GOODS AUDITORS WITHIN THE ICAO
UNIVERSAL SAFETY OVERSIGHT AUDIT PROGRAMME (USOAP)
CONTINUOUS MONITORING APPROACH (CMA) AND
ICAO COORDINATED VALIDATION MISSION (ICVM) FRAMEWORK**

(Presented by the United Arab Emirates)

EXECUTIVE SUMMARY

This paper proposes the formal recognition of Dangerous Goods specialists as auditors within the framework of ICAO's Universal Safety Oversight Audit Programme (USOAP) Continuous Monitoring Approach (CMA) and the ICAO Coordinated Validation Mission (ICVM). Currently, Dangerous Goods protocol questions are addressed under the flight operations area by auditors with flight operations backgrounds, who may lack sufficient Dangerous Goods expertise. This creates a potential gap in oversight quality. The paper calls for ICAO to allow qualified Dangerous Goods specialists to be trained, certified, and deployed as Dangerous Goods auditors to enhance the accuracy, effectiveness, and fairness of Dangerous Goods oversight under USOAP CMA and ICVM Program.

Action: The Assembly is invited to:

- note the concerns related to the current methodology for dangerous goods oversight within the framework of the ICAO Universal Safety Oversight Audit Programme Continuous Monitoring Approach (USOAP CMA);
- recognize the importance of formally acknowledging and utilizing qualified dangerous goods specialists as ICAO auditors; and
- request the ICAO USOAP CMA office to consider to review and revise the relevant auditor qualification criteria, with a view to enabling the certification and deployment of dangerous goods auditors in accordance with a competency-based oversight framework.

<i>Strategic Goals:</i>	This working paper relates to <i>Every Flight is Safe and Secure</i> .
<i>Financial implications:</i>	
<i>References:</i>	Annex 6 — <i>Operation of Aircraft</i> Annex 18 — <i>The Safe Transport of Dangerous Goods by Air</i> ICAO USOAP CMA & ICVM

1. INTRODUCTION

1.1 Under the current implementation of the ICAO Universal Safety Oversight Audit Programme Continuous Monitoring Approach (USOAP CMA), the Dangerous Goods Protocol Questions are addressed under the area of Flight Operations (OPS). As such, ICAO designates auditors with a background in flight operations to assess both flight operations and dangerous goods oversight elements during audits and ICAO coordinated validation missions (ICVMs).

1.2 However, this dual assignment does not adequately reflect the specialized nature of dangerous goods regulatory requirements, which fall under Annex 18 — *The Safe Transport of Dangerous Goods by Air* to the Chicago Convention and are distinct from the Annex 6 — *Operation of Aircraft* framework governing flight operations. While integration and alignment among all ICAO Annexes is essential, and collaboration across ICAO Panels is crucial to ensure a harmonized approach to aviation safety, it is important to recognize that dangerous goods oversight is a specialized technical domain, hence Dangerous Goods specialists possesses the expertise required to evaluate State compliance more accurately than general flight operations auditors.

2. PROBLEM STATEMENT

2.1 The current methodology may lead to:

- a) Dangerous Goods audits being conducted by auditors lacking Dangerous Goods specific expertise;
- b) missed opportunities to detect noncompliance or areas for improvement in Dangerous Goods programs;
- c) inadequate recognition of competent Dangerous Goods professionals, resulting in their exclusion from contributing to ICAO's global oversight mechanism; and
- d) reduced credibility and effectiveness of Dangerous Goods oversight under the ICAO USOAP CMA and ICVM program.

3. JUSTIFICATION / DISCUSSION

3.1 Dangerous Goods is a standalone discipline with:

- a) a dedicated ICAO Annex (Annex 18 – *The Safe Transport of Dangerous Goods by Air*);
- b) its own ICAO Dangerous Goods Panel (DGP);
- c) independent technical requirements and guidance materials (i.e., the Technical Instructions); and
- d) unique national regulatory frameworks, regulatory compliance and enforcement procedures, and criteria.

3.2 Moreover, the increasing complexity and volume of dangerous goods in air transport, especially lithium batteries, infectious substances, and radioactive materials, require subject-matter experts to ensure proper oversight.

3.3 The recognition of Dangerous Goods Specialists as ICAO Auditors would:

- a) improve audit quality and relevance in the DG domain;
- b) ensure fair recognition of qualified personnel;
- c) reinforce ICAO's commitment to a competency-based approach in training, qualification, and deployment of auditors, thereby enhancing the credibility and integrity of its safety oversight system; and
- d) promote the credibility and effectiveness of the ICAO USOAP CMA and ICVM Program.

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