



**DANGEROUS GOODS PANEL (DGP)  
MEETING OF THE WORKING GROUP OF THE WHOLE**

**Rio de Janeiro, Brazil, 20 to 24 October 2014**

**Agenda Item 7: Other business**

**TERMINOLOGY FOR AUTHORIZATION FOR OPERATORS  
TO CARRY DANGEROUS GOODS**

(Presented by B. Carrara)

**REVISED**

**SUMMARY**

This working paper proposes clarification on the terminology used in Annex 6 when referring to an authorization for operators to carry dangerous goods as cargo.

**Action by the DGP-WG:** The DGP-WG is invited to provide comments on the usage of the words “approval” and “authorization” in relation to the transport of dangerous goods by air in Annex 6.

**1. INTRODUCTION**

1.1 Amendment 38 to Annex 6 — *Operation of Aircraft, Part I — International Commercial Air Transport — Aeroplanes* introduced a new Chapter 14 and a new Attachment K both related to dangerous goods. The new material refers to the authorization for operators to carry dangerous goods as an “operational approval”. On the other hand, the operations specifications (OpSpecs) layout in Appendix 6 to Annex 6 refers to a “special authorization” as shown below.

<b>OPERATIONS SPECIFICATIONS</b> (subject to the approved conditions in the operations manual)				
...				
SPECIAL AUTHORIZATIONS	YES	NO	SPECIFIC APPROVALS <sup>9</sup>	REMARKS
Dangerous goods	<input type="checkbox"/>	<input type="checkbox"/>		
Low visibility operations				
Approach and landing	<input type="checkbox"/>	<input type="checkbox"/>	CAT <sup>10</sup> : _____ RVR: _____ m DH: _____ ft	
Take-off	<input type="checkbox"/>	<input type="checkbox"/>	RVR <sup>11</sup> : _____ m	
Operational credit(s)	<input type="checkbox"/>	<input type="checkbox"/>	<sup>12</sup>	
...				

1.2 It may also be noted there may exist other types of authorizations for dangerous goods which Annex 6 names as “specific approvals”. It is understood that these approvals refer to the transport of specific types of dangerous goods only, for example, dry ice, biological substance, Category B and dangerous goods in excepted quantities, or the transport of COMAT classified as dangerous goods.

1.3 Annex 18 and the Technical Instructions define an approval as:

**Approval.** *An authorization granted by an appropriate national authority for:*

- a) *the transport of dangerous goods forbidden on passenger and/or cargo aircraft where the Technical Instructions state that such goods may be carried with an approval; or*
- b) *other purposes as provided for in the Technical Instructions.*

*Note.— In the absence of a specific reference in the Technical Instructions allowing the granting of an approval, an exemption may be sought.*

1.4 Comparing the meaning of “approval” used in Annex 18 with “approval” used in Annex 6 to describe an authorization for operators to transport dangerous goods, it is suggested that there is a contradiction, since the purpose of Annex 18 is to allow the transport of dangerous goods normally forbidden and the purpose of Annex 6 is the opposite.

1.5 The discrepancy identified in the text of Chapter 14 and Attachment K of Annex 6 compared with the OpSpecs layout in Appendix 6 of the same Annex may be considered another contradiction. It is noted that the same document uses the expressions “operational approval” and “special authorization” to describe the same situation.

1.6 Thus, this working paper suggests that the word “authorization” would be more appropriate for situations in which an operator is allowed to transport dangerous goods by air through an authorization process conducted by the State of the Operator as described in Annex 6.

## 2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to provide comments on the usage of the words “approval” and “authorization” for transport of dangerous goods by air.

2.2 The DGP-WG is also invited to consider if there should be an amendment to Annex 6 to replace the word “approval” with “authorization”, both in the text of Chapter 14 and Attachment K and the second column of the OpSpecs template in Appendix 6. If there is support for this, a working paper will be brought forward to the next Operations Panel (OPSP) meeting for consideration. In this case, the DGP is invited to provide a definition for “authorization”. The appendix to this working paper presents a draft of the amendments to be proposed in the text of Annex 6.

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APPENDIX

PROPOSED AMENDMENT TO ANNEX 6, PART I

CHAPTER 14. DANGEROUS GOODS

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14.2 Operators with ~~no operational approval~~ authorization to transport dangerous goods as cargo

The State of the Operator shall ensure that operators not ~~approved~~ authorized to transport dangerous goods have:

...

14.3 Operators with authorization to ~~transporting~~ dangerous goods as cargo

The State of the Operator shall ~~approve~~ authorize the transport of dangerous goods and ensure that the operator:

...

14.4 Provision of information

The operator shall ensure that all personnel, including third-party personnel, involved in the acceptance, handling, loading and unloading of cargo are informed of the operator's ~~operational approval~~ authorization and limitations with regard to the transport of dangerous goods.

...

**APPENDIX 6. AIR OPERATOR CERTIFICATE (AOC)**

...

**3. Operations specifications for each aircraft model**

...

OPERATIONS SPECIFICATIONS (subject to the approved conditions in the operations manual)				
...				
SPECIAL AUTHORIZATIONS	YES	NO	SPECIFIC APPROVALS <u>AND</u> <u>AUTHORIZATIONS</u> <sup>9</sup>	REMARKS
Dangerous goods	<input type="checkbox"/>	<input type="checkbox"/>		
...				

...

**ATTACHMENT K. DANGEROUS GOODS**

*Supplementary to Chapter 14*

**1. Purpose and scope**

The material in this attachment provides guidance regarding the carriage of dangerous goods as cargo. Chapter 14, includes dangerous goods operational requirements that apply to all operators. Operators that are ~~approved~~ authorized to transport dangerous goods as cargo need to meet additional requirements. In addition to the operational requirements contained in Annex 6, there are other requirements in Annex 18 and the Technical Instructions that also need to be complied with.

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**3. States**

3.1 The State of the Operator should indicate in the operations specification if an operator is ~~approved~~ authorized or is not ~~approved~~ authorized to transport dangerous goods as cargo. When an operator is ~~approved~~ authorized to transport dangerous goods as cargo any limitations should be included.

3.2 An ~~operational approval~~ specific authorization may be granted for the transport of specific types of dangerous goods only (e.g. dry ice; biological substance, Category B; and dangerous goods in excepted quantities) or COMAT.

~~3.3 The Supplement to the Technical Instructions contains guidance on a State's responsibilities with respect to operators. This includes additional information to Part 7 of the Technical Instructions on~~

storage and loading, provision of information, inspections, enforcement and Annex 6 information relevant to the State's responsibilities for dangerous goods.

~~3.4 Carriage of dangerous goods other than as cargo (e.g. medical flights, search and rescue) are addressed in Part 1, Chapter 1, of the Technical Instructions. The exceptions for the carriage of dangerous goods that are either equipment or for use on board the aircraft during flight are detailed in Part 1, 2.2.1, of the Technical Instructions.~~

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#### 4. Operator

4.1 An operator's training programme should cover, as a minimum, the aspects of the transport of dangerous goods listed in the Technical Instructions in Table 1-4 for operators holding an approval authorization or Table 1-5 for operators without an approval authorization. Recurrent training must be provided within 24 months of previous training, except as otherwise provided by the Technical Instructions.

...

4.5 Operators may seek approval specific authorization to transport, as cargo, specific dangerous goods only, such as dry ice, biological substance, Category B, COMAT and dangerous goods in excepted quantities.

4.6 Attachment 1 to Part S-7, Chapter 7, of the Supplement to the Technical Instructions contains additional guidance and information on requirements regarding operators not approved authorized to transport dangerous goods as cargo and for operators that are approved authorized to transport dangerous goods as cargo.

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— END —