



**Civil Aviation Authority**  
**SAFETY NOTICE**  
Number: SN-2016/004



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## **Dangerous Goods Training Requirements Applicable to Fixed Base Operator Personnel**

**This Safety Notice contains recommendations regarding operational safety.**

Recipients must ensure that this Notice is copied to all members of their staff who need to take appropriate action or who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

<b>Applicability:</b>	
<b>Aerodromes:</b>	All Aerodrome Operators All Fixed Base Operators All Ground Handling Organisations
<b>Air Traffic:</b>	Not primarily affected
<b>Airspace:</b>	Not primarily affected
<b>Airworthiness:</b>	Not primarily affected
<b>Flight Operations:</b>	All UK AOC Holders, All Non-UK Operators Operating to the UK
<b>Licensed/Unlicensed Personnel:</b>	Not primarily affected

### **1 Introduction**

- 1.1 The CAA is tasked with monitoring compliance with EASA-OPS, the Air Navigation (Dangerous Goods) Regulations 2002 and the International Civil Aviation Organization (ICAO) Technical Instructions regarding the safe transport of dangerous goods by air. These Instructions provide detailed requirements on the preparation, acceptance and carriage of consignments of dangerous goods by air and details the training requirements applicable to relevant personnel involved with the transport of passengers, their baggage and cargo.
- 1.2 During audits of passenger and cargo handling services provided to operators at Fixed Base Operator facilities, instances were identified where no dangerous goods training was provided to personnel involved with passenger handling and the loading and unloading of cargo and baggage.
- 1.3 The purpose of this Safety Notice is to remind Fixed Base Operators of the requirements for the provision of dangerous goods training to be provided to such personnel.

Note: For the purposes of this Safety Notice, a Fixed Base Operator is a business based at an aerodrome providing services to corporate, business and private aircraft operators such as:

- aircraft handling and refuelling;
- passenger handling;
- general cargo and baggage handling; and
- engineering and other support services

1.4 This Safety Notice supersedes SN-2013/006.

## 2 Background

2.1 The requirements within the ICAO Technical Instructions are enacted in UK law through EASA-OPS and the Air Navigation (Dangerous Goods) Regulations 2002, and these apply to:

- all aircraft registered in the UK;
- all foreign registered aircraft operating within UK airspace;
- shippers of dangerous goods;
- freight forwarders;
- handling agents; and
- passengers.

The CAA verifies compliance through the conduct of audits of aircraft operators and agencies operating on their behalf.

2.2 The requirements for dangerous goods training are detailed in Part 1, Chapter 4 of the ICAO Technical Instructions and are reproduced within Section 1.5 of the International Air Transport Association (IATA) Dangerous Goods Regulations.

2.3 The ICAO Technical Instructions require that the following categories of personnel (amongst others) receive dangerous goods training commensurate with their responsibilities:

- Category 7 - Staff accepting cargo or mail (other than dangerous goods);
- Category 8 - Staff involved in the handling, storage and loading of cargo or mail and baggage; and
- Category 9 - Passenger handling staff.

Note: The ICAO Technical Instructions includes stores in the definition of the term 'cargo'.

2.4 The ICAO Technical Instructions lists the aspects of training with which the various categories of staff need to be familiar within Table 1-4 (applicable to operators with a dangerous goods approval) and Table 1-5 (applicable to operators not holding a dangerous goods approval).

2.5 Personnel identified in the categories specified in Table 1-4 or Table 1-5 must be trained or training must be verified prior to the person performing any duty specified within those tables. Recurrent training must be provided within 24 months of previous training to ensure knowledge is current. However, if recurrent training is completed within the final three months of validity of previous training, the period of validity extends from the month on which the recurrent training was completed until 24 months from the expiry month of that previous training.

- 2.6 A test to verify understanding must be provided following training, and records of training must be retained by the employer for a minimum period of 36 months from the most recent training completion month and must be made available upon request to the employee or appropriate national authority.
- 2.7 Failure to provide categories of staff identified within Table 1-4 or Table 1-5 with dangerous goods training commensurate with their responsibilities is a breach of the Regulations. CAA Flight Operations has responsibilities with regards to investigation of breaches of the Regulations. When an incident is judged to be sufficiently serious to warrant a formal investigation this is carried out by an Investigation Officer from the CAA Investigation and Enforcement Team, in liaison with Flight Operations. On completion of the investigation, all the evidence is considered and a decision made as to whether or not to prosecute the alleged offender. In the event of a prosecution, an offender can be fined up to £5,000 per contravention in a Magistrates Court. If there is a Crown Court trial, the penalty can be an unlimited fine or up to two years' imprisonment or both.
- 2.8 In the absence of personnel having received dangerous goods training commensurate with their responsibilities, they may not legally undertake any duties associated with the carriage of passengers, cargo, mail or stores and baggage. Personnel who have not received the required training (or continue to work after their training qualification has expired) will be committing an offence against the Regulations, which may result in formal action with a view to prosecution.
- 2.9 CAA Flight Operations will continue to schedule audits of Fixed Base Operators to verify compliance with dangerous goods requirements, including dangerous goods training. Further information on dangerous goods training programmes is given in paragraph 3.

### **3 Dangerous Goods Training Programmes**

- 3.1 The ICAO Technical Instructions requires dangerous goods training programmes to be established and maintained by or on behalf of ground handling agencies which perform, on behalf of the aircraft operator, the act of processing cargo or passengers. Personnel are required to receive function-specific training covering the aspects required for the personnel concerned, as specified within Tables 1-4 and 1-5 of the ICAO Technical Instructions and training must be followed by a test of understanding. Such training is typically around three hours' duration and there are various means by which it may be achieved, for example, as follows:
- Provided by a CAA Approved Dangerous Goods Training Organisation, or other external training provider. A list of CAA Approved Dangerous Goods Training Organisations is provided online via [www.caa.co.uk](http://www.caa.co.uk) > [Commercial industry](#) > [Aircraft](#) > [Dangerous goods](#).
  - Delivered in-house by development of own training programme by a competent instructor, provided that as a minimum the training meets the requirements of CAP 483: Training in the Safe Transport of Dangerous Goods by Air, and reflects the specific responsibilities of the person receiving the training. CAP 483 is also available online (free of charge) at [www.caa.co.uk/CAP 483](http://www.caa.co.uk/CAP_483).
  - Through computer-based training, provided that training meets the requirements of CAP 483.
  - Through self-study books. IATA produces self-study books applicable to the various categories of personnel involved. Each of the books includes review questions for each aspect of training, followed by a final review questionnaire. This may be used as the test to verify understanding of the training (the answers provided in the books must not be available to candidates during the test). Please visit [www.iata.org](http://www.iata.org) and enter a 'keyword search' of 'dangerous goods training books' for further details.

- 3.2 Candidates must not have access to the test to verify understanding until it is set in a controlled environment to prevent collaboration between candidates.
- 3.3 Other general information regarding dangerous goods training is also provided at [www.caa.co.uk](http://www.caa.co.uk) > [Commercial industry](#) > [Airports](#) > [Safety](#) > [Dangerous goods](#) > [Requirements for ground handling and cargo agents](#). This section of the website provides training checklists detailing the content of training for categories of personnel, including passenger handling, general cargo and baggage handling personnel (Categories 7, 8 and 9). These checklists may be used in the development of in-house training programmes or as a means of a self auditing aide-memoir to ensure existing training programmes meet the current syllabus established within Part 1 Chapter 4 of the ICAO Technical Instructions.

#### **4 Recognition of Undeclared/Hidden Dangerous Goods**

- 4.1 The CAA receives around 2,000 dangerous goods occurrence reports each year, and a high proportion of these relate to undeclared/hidden dangerous goods found within cargo, mail or stores, or prohibited dangerous goods in passenger baggage. Training is an important element to assist in the detection of such items. Personnel must be alert to indications that undeclared/hidden dangerous goods are present within cargo, mail or stores and personnel interfacing with passengers must be alert to indications that prohibited dangerous goods are carried by passengers or within their baggage.
- 4.2 To aid in the recognition of undeclared dangerous goods, to prevent undeclared dangerous goods from being loaded on an aircraft and to prevent passengers from taking on board those dangerous goods which they are not permitted to have in their baggage, passenger handling and cargo acceptance staff must be provided with information concerning:
- a) general descriptions that are often used for items in cargo or in passengers' baggage which may contain dangerous goods;
  - b) other indications that dangerous goods may be present (e.g. labels, markings); and
  - c) those dangerous goods which may be carried by passengers in accordance with Part 8:1.1.2 of the ICAO Technical Instructions.

Suitable information about both baggage and cargo is contained in a document entitled 'Recognition of prohibited dangerous goods within baggage' which can be found online at the [Dangerous Goods Resources webpage](#).

- 4.3 Fixed Base Operators must ensure that notices warning passengers of the types of dangerous goods which they are forbidden to transport aboard an aircraft are prominently displayed, in sufficient number, at each of the places at an airport where tickets are issued, passengers are checked in and aircraft boarding areas are maintained, and at any other location where passengers are checked in (including VIP, executive or passenger lounges). The notices must include visual examples of dangerous goods forbidden from transport aboard an aircraft.

Note: Where a passenger is not taken to a dedicated check-in or boarding area, the passenger must be warned of the types of dangerous goods which they are forbidden to transport aboard an aircraft by some other means prior to boarding the aircraft.

An electronic version of a suitable notice is available to download from the CAA website at [www.caa.co.uk/CAP 1402](http://www.caa.co.uk/CAP_1402).

## 5 Action to be Taken

### 5.1 Action for Fixed Base Operators:

- Establish a dangerous goods training programme (as detailed in paragraph 3 above).
- Implement an effective system to ensure the timely programming and delivery of initial and recurrent dangerous goods training to personnel identified in the applicable categories within Tables 1-4 and 1-5 of the ICAO Technical Instructions.
- Ensure that dangerous goods training is provided or verified prior to commencement of duty (including short-term, those on maternity leave or those returning from sickness).
- Retain dangerous goods training records (as detailed in paragraph 2.6 above).
- Develop and implement internal procedures to ensure that training expiry dates are monitored and staff remain trained.
- Ensure that passengers are warned of the types of dangerous goods which they are forbidden to transport aboard an aircraft (as detailed in paragraph 4.3 above).
- Ensure that passenger handling staff have readily available information to aid in the recognition of undeclared dangerous goods (as detailed in paragraph 4.2 above).
- Check that the policies of aircraft operators with regards to the carriage of dangerous goods requiring operator approval (in accordance with Part 8:1.1.2 of the ICAO Technical Instructions) are known and adhered to.
- Ensure that dangerous goods accidents/incidents, undeclared/misdeclared dangerous goods and discoveries of forbidden dangerous goods within baggage are reported to aircraft operators to enable them to fulfil their obligation to report such occurrences to the appropriate authorities of the State of the Operator and the State in which the discovery occurred.
- Provide confirmation of the points above to the operator via ad-hoc handling requests or service level agreements.

### 5.2 Action for Aircraft Operators:

- Ensure that dangerous goods training is provided or verified prior to commencement of duty (including short-term, those on maternity leave or those returning from sickness).
- Retain dangerous goods training records (as detailed in paragraph 2.6 above).
- Develop and implement internal procedures to ensure that training expiry dates are monitored and staff remain trained.
- Ensure that passengers are warned of the types of dangerous goods which they are forbidden to transport aboard an aircraft (as detailed in paragraph 4.3 above).
- Ensure that passenger handling staff have readily available information to aid in the recognition of undeclared dangerous goods (as detailed in paragraph 4.2 above).
- Check that the operator's policies with regards to the carriage of dangerous goods requiring operator approval (in accordance with Part 8:1.1.2 of the ICAO Technical Instructions) are known and adhered to.
- Ensure that dangerous goods accidents/incidents, undeclared/misdeclared dangerous goods and discoveries of forbidden dangerous goods within baggage are reported to aircraft operators to enable them to fulfil their obligation to report such occurrences to the appropriate authorities of the State of the Operator and the State in which the discovery occurred.

- Provide confirmation of the points above to the operator via ad-hoc handling requests or service level agreements.

### 5.3 Action for Aerodrome Operators:

- Alert Fixed Base Operators to this Safety Notice.

## 6 Queries

- 6.1 Any queries or requests for further guidance as a result of this communication should be addressed to CAA Flight Operations by email to [dgo@caa.co.uk](mailto:dgo@caa.co.uk).

## 7 Cancellation

- 7.1 This Safety Notice will remain in force until further notice.