

Transport of Dangerous Goods by Air

NOTE

This paper supersedes 15POS06, of the same name.

BACKGROUND

Today's international regulations for the transport of dangerous goods by air contain differences between the types and quantities of dangerous goods that are allowed to be transported on passenger aircraft and all-cargo aircraft. Different rules for passenger and all-cargo operations exist because regulators believe that pilots of freighter aircraft might have alternate means of dealing with on board emergencies due to cargo accessibility as compared with pilots engaged in passenger operations.

These differences evolved over time from earlier aircraft configuration that carried both passengers and cargo in a single cabin and that had additional crew members, such as flight engineers and navigators, which historically made cargo more accessible. In contrast, modern aircraft have multiple cargo compartments of varying capabilities and reduced accessibility in both passenger aircraft and cargo aircraft.

Today's transport of dangerous goods by air on cargo aircraft often occur on the same aircraft type, with the same crew alerting, the same fire suppression capabilities, and the same aircraft survivability as passenger aircraft. As aircraft have become more automated and crew component has decreased, there is less opportunity for flight crew to handle cargo even when accessible.

Additionally, as hazards to the safe transport of dangerous goods by air have emerged, different mitigation regulations were adopted between passenger aircraft and cargo aircraft to address those same hazards.

Although having certain cargo accessible does give cargo aircraft flight crew some additional options to address certain hazards, it falls far short of making up the difference in safety between the types and quantities of dangerous goods that are allowed to be carried on cargo aircraft versus passenger aircraft.

POSITION

IFALPA believes there should be one level of safety for all flight operations through changes to the international regulatory structure and adopt a performance-based approach to mitigating hazards to flight to ensure that there are no differences in the safety standards between all-cargo and passenger operations.