



香港特別行政區政府  
民航處

Civil Aviation Department  
The Government of the Hong Kong Special Administrative Region

## **Dangerous Goods Advisory Circular      DGAC 1/2006**

### **Training Requirement for Category 3, 4 and 5 Personnel of Freight Forwarders**

#### **International Civil Aviation Organization (ICAO) Requirements**

To tackle the problem of hidden dangerous goods (DG) inside air cargo consignments, ICAO has imposed a requirement that staff of freight forwarders, regardless of whether they are involved in the direct processing of DG, should receive DG training commensurate to their functions. This requirement has been stipulated under Chapter 4 of Part 1 of **ICAO Technical Instructions (TI) for the Safe Transport of DG by Air 2005-06 edition** and Section 1.5 of the **IATA DG Regulations (DGR) 2006 edition**. According to the TI, three categories of staff working in the freight forwarding industry will be involved. Some interpretations of the job nature of the staff are provided in the table below to facilitate the readers' understanding of the categorization: -

	<b><i>Category of Personnel</i></b>	<b><i>Guidelines</i></b>
(i)	<b><i>Category 3</i></b> - Staff of freight forwarders involved in <u>processing DG</u> <i>(Remarks: Equivalent to Category 3 Personnel defined under IATA DGR)</i>	Means those staff involved in <b>DIRECT CHECKING</b> of packaging, marking, labeling and documentation of DG.
(ii)	<b><i>Category 4</i></b> - Staff involved in <u>processing air cargo (other than DG)</u> <i>(Remarks: Equivalent to Category 4 Personnel defined under IATA DGR)</i>	Means those staff involved in <b>DIRECT CHECKING</b> of packaging, marking, labelling and documentation of cargo consignments.
(iii)	<b><i>Category 5</i></b> - Staff involved in <u>handling, storage or loading of any air cargo</u> <i>(Remarks: Equivalent to Category 5 Personnel defined under IATA DGR)</i>	Means those staff involved in actions other than processing, such as loading, transporting and storage of cargo consignments, which present the staff with an opportunity of having physical or close visual contact with the cargo consignments or perusal of their documentations.

[Remarks: Freight forwarders' staff with NO opportunity to come into physical or close visual contact with cargo consignments or perusal of their documentations do not belong to any of these three categories, for examples, IT, personnel or administration staff.]

### **Legal Effect**

After necessary legal amendments to the **Dangerous Goods (Consignment by Air) (Safety) Regulations Cap 384A** and the gazettal of the **Commencement Notices**, the abovementioned training requirement will come into legal effect in Hong Kong. Freight forwarders who fail to comply with the new regulations commit an offence and shall be liable to a fine of \$20,000 and to imprisonment for 6 months.

### **Implementation Plan**

To allow sufficient time for the freight forwarding industry to provide training for its staff, it is the plan of this DG office to implement the three training requirements in phases. **Commencement Notice** for Category 3 personnel will be gazetted earlier whereas **Commencement Notice** for Category 4 & 5 personnel will be gazetted at a later stage. In other words, different grace periods will be allowed and their length will be subject to our periodic review of the progress of training in the industry. Though a flexible approach will be adopted by this DG office in finalizing the grace period, our initial timetable is given below, which should serve to provide the industry with a guideline: -

	<i>Category of Personnel</i>	<i>Implementation Date</i>
(i)	<i>Category 3</i>	1 November 2006
(ii)	<i>Category 4</i>	Mid 2008 (subject to confirmation)
(iii)	<i>Category 5</i>	Mid 2008 (subject to confirmation)

### **DG Training Course Recognized**

Only the completion of DG training courses with a training curriculum meeting the latest ICAO TI requirement (i.e. currently – specification under Chapter 4 of Part 1 of TI 2005-06 edition) will be recognized by this DG office as fulfilling the training requirement. Examples of training courses that are considered as meeting this training requirement include: -

	<b><i>Training Class for</i></b>	<b><i>Type of Training</i></b>
<b><i>(i)</i></b>	<b><i>Category 3</i></b>	(a) Training course organized by IATA accredited service provider (SP); (b) Training course approved by this DG office for Category 6 airline and ground handling agents' personnel (List of approved Category 6 training course can be obtained from DG office upon request); or (c) Any other training courses that have separately been vetted and recognized by DG office as meeting the requirement (List of recognized Category 3 training courses can be obtained from DG office upon request).
<b><i>(ii)</i></b>	<b><i>Category 4</i></b>	(a) Classroom or seminar based training organized by IATA accredited SP + Examination to be attended by candidates in-person organized by SP or Hongkong Association of Freight Forwarding and Logistics Ltd (HAFFA); or (b) Any other training courses that have separately been vetted and recognized by DG office as meeting the requirement (List of recognized Category 4 training courses can be obtained from DG office upon request).
<b><i>(iii)</i></b>	<b><i>Category 5</i></b>	(a) Classroom or seminar based training organized by IATA accredited SP + Examination to be attended by candidates in-person organized by SP or HAFFA; or (b) Any other training courses that have separately been vetted and recognized by DG office as meeting the requirement (List of recognized Category 5 training courses can be obtained from DG office upon request).

**Process to Obtain CAD's Recognition of DG Training Course as Fulfilling the ICAO Training Requirement**

Organizer of training courses for Category 3, 4 or 5 personnel who wishes to obtain CAD's recognition as fulfilling the ICAO training requirement should submit their application to this DG Office, Airport Standards Division, Civil Aviation Department, Room 6T067, Passenger Terminal Building, Hong Kong International Airport, Hong Kong, China, or fax it to (852) 2795 8469. The vetting process for an application would normally take 14 working days to complete.

To facilitate the vetting process, all applications should include information on: -

- (i) Syllabus of training programme and course material used;
- (ii) Background of training organization;
- (iii) Training facilities and venue;
- (iv) Qualification and experience of instructor;
- (v) Training timetable; and
- (vi) Examination arrangement.

**Recommendation and Reminder**

Freight forwarders are strongly recommended to send their Category 3, 4 or 5 staff to attend DG training recognized by this DG office before the abovementioned implementation date. Freight forwarders are also reminded that DG training of refreshing nature must be taken every 24 months. And all relevant training records or certificates shall be made available upon inspection carried out by authorized officers from the Civil Aviation Department.

Should you have any query about this circular, please contact Safety Officers (Dangerous Goods) Mr. Eric CHIM at 2182 1221 or Mr. Alex MOK at 2182 1214.