



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 1/2022**

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### **Introduction to Competency-based Approach to Dangerous Goods Training and Assessment (CBTA) (*for Employers*)**

#### **Introduction**

Under the Dangerous Goods (Consignment by Air) (Safety) Regulations (Cap. 384A) and the Air Navigation (Dangerous Goods) Regulations, as Schedule 16 to the Air Navigation (Hong Kong) Order 1995 (Cap. 448C), it is a requirement that all personnel involved in the transport of cargo, passengers and baggage by air, including but not limited to the staff of shippers, freight forwarders, aircraft operators and handling agents, whether they are in-house or sub-contracted office or warehouse personnel, shall have completed DG training programmes that are appropriate to their functions and approved by the Civil Aviation Department (CAD), prior to carrying out relevant job functions and responsibilities.

2. In the 2021-2022 edition of Technical Instructions for the Safe Transport of Dangerous Goods by Air (TIs), the International Civil Aviation Organization (ICAO) has updated the requirements of DG training and assessment for employees of shippers, freight forwarders, aircraft operators and handling agents from the categorization approach to the competency-based approach, with a view to producing a competent workforce by providing focused training. In accordance with the TIs, these personnel must be trained in the requirements commensurate with their job functions and responsibilities. Such training must also include general familiarization training, function-specific training as well as safety training.

3. These changes have been given legal effect in laws mentioned in paragraph 1 above and shall become mandatory from 1 January 2023. In this connection, employers shall ensure that DG training and assessment provided to employees meet this new requirement commencing from 1 January 2023. As a transitional arrangement, training and assessment completed and certificates that are issued before 1 January 2023 with a validity period beyond 1 January 2023 will continue to be valid until they expire.

4. In April 2021, the CAD has published a document explaining the new requirements under the framework of Competency-based Approach to Dangerous Goods Training and Assessment (CBTA); it has been included in Attachment I of this circular for reference.

## **Employers' responsibilities**

### *Training needs analysis*

5. Under the CBTA framework, employers have the responsibility to conduct training needs analysis for their employees whose job functions involve the transport of cargo, passengers and baggage by air. Based on the results of this analysis, appropriate DG training programmes can then be developed or arranged for the employees, which in turn reinforces the goal of producing a competent workforce. The result from this analysis can be a list of tasks that are typically performed by the employees.

6. ICAO has compiled a list of tasks typically performed by certain well-defined roles in the air cargo supply chain as well as aircraft operators. With reference to this list of tasks, the CAD has produced a sample template to assist employers in formulating training needs analysis for their employees. The sample template can be found in Attachment II of this circular.

### *Maintaining training and assessment records*

7. The employer must maintain all records of training and assessment for their employees whose job functions involve the transport of cargo, passengers and baggage by air. These include training needs analysis, a summary of training and assessment records and the relevant training certificates as applicable.

8. Training and assessment records must be retained by the employer for a minimum period of 36 months from the most recent training and assessment completion month and must be made available to the CAD upon request.

9. The CAD has adapted an example of a training and assessment record under the CBTA framework with reference to ICAO's list of well-defined roles, which can be found in Attachment III of this circular.

10. The requirement for personnel to undergo recurrent training and assessment within 24 months of previous training cycle remains unchanged under the CBTA framework.

11. With reference to paragraph 3 above, personnel who have completed training and assessment or have been issued certificates under the categorization approach that remains valid after 1 January 2023 shall be eligible to attend recurrent training and assessment under the CBTA framework that commensurate with their previous training's intended job functions and responsibilities.

12. For the avoidance of doubt, if the role of an employee has changed such that previous training is no longer suitable for the new job functions and responsibilities, an initial training and assessment under the CBTA framework that commensurate with their new job functions and responsibilities have to be undertaken.

*Training and assessment sought from third party training providers*

13. Employers who do not establish and maintain their own DG training programme for their employees may seek outsourced training and assessment offered by third party training providers.

14. It is recommended that before employers enrol their employees in a CAD-approved DG training programme, the compatibility of the programme should be verified with the results of the training needs analysis of their employees. Such information can be found on the websites of the training providers, if any, or may be provided by the training providers upon enquiry.

15. The list and information of organizations providing approved DG training programmes can be obtained from the websites of the CAD at:

For shippers and freight forwarders –

[https://www.cad.gov.hk/application/DG\\_Training.pdf](https://www.cad.gov.hk/application/DG_Training.pdf)

For aircraft operators and handling agents –

[https://www.cad.gov.hk/application/DG\\_Training\\_448C.pdf](https://www.cad.gov.hk/application/DG_Training_448C.pdf)

*Employers establishing training programme for their own employees*

16. Employers who establish and maintain their own DG training programme for their employees may refer to DGAC 2/2022 for more information on the application process for DG training programme approval.

17. Should there be any query regarding this circular, please contact the DG Office at 2910 6856 or 2910 6857.

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An electronic version of this circular can be downloaded at  
<http://www.cad.gov.hk/english/DGAC.html>