



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 3/2026**

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### **False Documents**

This circular serves to remind all shippers and freight forwarders that when offering or handling consignments of general cargo or dangerous goods (“DG”), they bear the responsibility for ensuring that the documentation they maintained and submitted to airlines or other persons in the supply chain is authentic, accurate and valid. Such documentation may include but not limited to Air Waybill, DG transport document (i.e. Shipper’s Declaration for Dangerous Goods) and, where additional requirements are imposed by individual airlines, any associated supporting documents relating to the properties of the consigned DG or packaging specification. The use of fraudulent or intentionally false documentation is illegal and could result in legal consequences.

### Commonly Encountered Supporting Documents

2. In accordance with the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (“TIs”) published by the International Civil Aviation Organization (“ICAO”), certain DG and packagings are subject to specific test requirements. For instance, lithium batteries offered for air transport must be of the type proven to meet the requirements of all tests specified in the *UN Manual of Tests and Criteria*, Part III, subsection 38.3 (“UN 38.3 test”). Shippers and freight forwarders may be required by individual airlines to provide relevant test report or other supporting document as evidence showing the lithium batteries being consigned have passed the UN 38.3 test.

3. Airlines may also request the information relied upon by the shipper in assigning a classification of the DG. Such information may include, among others, the known composition or physical characteristics of substances or articles, the results of classification testing, or a safety data sheet (SDS) issued in accordance with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

4. Shippers and freight forwarders are hereby reminded of their obligation to ensure the veracity of documentation, including UN 38.3 test report and SDS, which

they maintain and provide to airlines and other persons in the supply chain. When processing and accepting DG consignment, due diligence should be exercised to check against any discrepancies or inconsistencies with its SDS, test report or other applicable documents. In case of doubt on the authenticity, validity or accuracy of the documentation, clarification and confirmation should be sought direct from the test report provider, distributor, manufacturer, or other relevant parties. Records of the verification evidence (such as email or other written records) should also be properly maintained.

#### Relevant Criminal Offences

5. Under the Crimes Ordinance (Cap. 200), any person who makes a false instrument, or uses an instrument which is, and which he knows or believes to be, false, with the intention of inducing somebody to accept it as genuine, and by reason of so accepting it to do or not to do some act to his own or any other person's prejudice, commits an offence and is liable on conviction on indictment to imprisonment for 14 years.

6. The Civil Aviation Department (CAD) may, when necessary, require shippers or freight forwarders to give information as to the source from which any dangerous goods were obtained, or as to the making, packing, marking or labelling of such goods or of any packaging, or as to the use or destination of such goods under the Dangerous Goods (Consignment by Air) (Safety) Ordinance (Cap. 384). Any person who wilfully or recklessly gives false information or withholds such information, commits an offence and is liable to a fine of \$25,000 and to imprisonment for 6 months.

7. In case any documentation provided to the CAD is suspected to be fraudulent, the case may be referred to the Hong Kong Police Force for further investigation.

8. Should there be any queries regarding this circular, please contact the Dangerous Goods Office at 2910 6855, 2910 6856 or 2910 6857.

9. This circular supersedes DGAC 4/2010.

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