



Advisory Circular

AC 92-1(0)

DECEMBER 2003

DANGEROUS GOODS TRAINING

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Advisory Circulars are intended to provide recommendations and guidance to illustrate a means but not necessarily the only means of complying with the Regulations, or to explain certain regulatory requirements by providing interpretative and explanatory material.

Where an AC is referred to in a 'Note' below the regulation, the AC remains as guidance material.

ACs should always be read in conjunction with the referenced regulations

1. REFERENCES

Subpart C and Tables 92.135-1 and 92.135-2 of Part 92 of the Civil Aviation Safety Regulations (CASRs)1998.

2. PURPOSE

2.1 To provide advice to the aviation industry on the regulatory requirements for:

- dangerous goods training of employees of operators, cargo handling agents, freight forwarders, shippers of dangerous goods and security screeners;
- the required qualifications of instructors on dangerous goods training courses approved by CASA and how approval to instruct on those courses may be obtained; and
- the qualifications required of instructors on courses not required to be approved by CASA.

2.2 It applies to:

- commercial aircraft operators;
- ground handling agents (GHA);
- freight forwarders;
- shippers of dangerous goods;
- Screening Authorities; and
- independent dangerous goods training organisations seeking the approval of CASA to conduct dangerous goods training.

3. STATUS OF THIS AC

This is the first AC on dangerous goods training.

4. WHO IS REQUIRED TO UNDERTAKE DANGEROUS GOODS TRAINING?

4.1 Any employee of a commercial operator (except operators involved in agricultural (including horticultural), forestry, pollution control, search and rescue, balloon, joyflight, scenic flight or flying training operations), a GHA or a freight forwarder who is handling, or is involved in the handling of, cargo which has been consigned for carriage on board an aircraft, including passenger's checked or carry-on baggage, is required to undertake dangerous goods training. It is not necessary for an employee to be physically handling the cargo before being required to undertake the training. For example, an employee of an operator or freight forwarder with responsibilities for supervision of the cargo handling process would be considered to be involved in that handling and must undertake the appropriate level of dangerous goods training. Conversely, an employee of one of those entities without responsibility for the physical handling or checking of the consignment or the supervision of those tasks may not be required to undertake such training even though they may handle the documentation associated with the consignment.

4.2 An employee of a shipper of dangerous goods is required to undertake training if the employee handles and packs dangerous goods for consignment by air transport - CASR 92.120 refers. It should be noted that “packing” dangerous goods not only includes the placing of dangerous goods into packagings but also includes the application of labels, marking of packages and preparing the dangerous goods transport document (shipper’s declaration) for the consignment.

4.3 An employee of a screening authority is required to undertake training if the employee is responsible for security screening of passengers - CASR 92.115 refers.

4.4 It should be noted that an employee is defined in CASR 92.085 as being in one of six groups, Group A to Group F. For example, a Group A employee means “an employee whose duties include accepting, or supervising someone whose duties include accepting, cargo known or believed to contain dangerous goods consigned for transport on an aircraft at any time after it leaves the custody of the original consignor”, and (unless the contrary intention appears) includes a deemed employee whose function includes those duties. The “deemed” employee referred to is also defined in the regulation and refers to a person who, though not directly employed, performs services for an operator etc. For example, an employee of a contractor or a contracted employee would fit the definition of a “deemed” employee. Therefore, where an operator uses the services of a GHA (or a freight forwarder performing that function) to handle cargo on the operator’s behalf, the operator should be satisfied that the employees of those organisations have undertaken the dangerous goods training required by the regulations. GHAs and freight forwarders providing ground-handling services for operators should also have access to the operator’s dangerous goods manual and comply with the instructions contained in that manual.

4.5 Shippers of dangerous goods who prefer to use the services of another person or organisation to carry out the packing and shipment of dangerous goods on their behalf, need not train the shipper’s own employees. The organisation or other person who is acting on the shipper’s behalf is considered, under the CASRs, to be a “deemed employee” of the shipper for the purpose of the transaction. It is therefore in the shipper’s interests to ensure that the organisation or person has undertaken the appropriate dangerous goods training before engaging them.

4.6 Australian aircraft operators who have employees or “deemed” employees (other than aircraft operating crew) located outside Australia, should ensure that, in accordance with the provisions of CASR 92.130, those employees are trained in accordance with the aviation law in force in the country in which those employees perform their duties. Where no such law exists, the employees should be trained in accordance with the requirements of the Technical Instructions. Those operators should ensure that dangerous goods training records for the employees are maintained in accordance with those rules, that the training is evaluated at least every second year and the evaluation process is included in the operator’s audit program.

4.7 Foreign aircraft operators with employees in Australia should ensure that, in accordance with the provisions of CASR 92.125, those employees are trained in accordance with the law in force in the place where the operator's aircraft are registered. Where such a law does not exist or the operator's aircraft are registered in more than one State, the employees should be trained in accordance with the requirements of the Technical Instructions. Dangerous goods training records should also be maintained in accordance with those requirements.

4.8 Operators, GHAs, freight forwarders, screening authorities and shippers of dangerous goods should ensure that their employees have undertaken the training required by the regulations before the employee first performs the relevant duties.

5. HOW OFTEN IS TRAINING REQUIRED TO BE UNDERTAKEN?

Training is required to be undertaken at intervals of not more than 2 years. However, CASR 92.090 allows an employee to undertake the training up to three months before the date on which the training is due without affecting the due date.

6. WHAT TYPES OF COURSES ARE THERE?

Part 92 of the CASRs contains two syllabi for dangerous goods training:

- (a) The Table 92.135-1 syllabus is for courses which are required to be approved by CASA before relevant employees are instructed. Instructors on these courses must also be approved by CASA; and
- (b) The Table 92.135-2 syllabus is for courses which may be conducted for relevant employees without obtaining an approval from CASA. Instructors on these courses must themselves have completed satisfactorily, in the previous two years, an approved course for either Group A or Group B employees.

7. WHAT TRAINING IS REQUIRED TO BE UNDERTAKEN?

7.1 An employee is only required to undertake training in the syllabus subjects which are relevant to the employee's responsibilities and duties within the organisation. Similarly, only those parts of each syllabus subject which are relevant need to be covered. (The exception is that 92.135 requires that all employees on all courses must receive training in the provisions concerning passengers and crew.)

7.2 For example:

- (a) an employee of an operator carrying only passenger's checked and carry-on baggage need not be trained in the syllabus items covering cargo (freight) acceptance and handling procedures;
- (b) employees of an operator with a published (in the dangerous goods manual) policy of not carrying dangerous goods consigned as cargo (freight) need not undertake training in the syllabus subjects relating specifically to acceptance of consigned dangerous goods. The training of these employees may be limited to those syllabus subjects relating to acceptance of non-dangerous cargo. Employees responsible for accepting only passenger's checked or carry-on baggage are not required to be instructed on the acceptance of other cargo;

- (c) employees of freight forwarders who also have responsibility for provision of ground handling services (accepting on behalf of the operator dangerous goods or non-dangerous goods or only handling cargo and loading of aircraft), should ensure that the dangerous goods training undertaken, not only covers the freight forwarder's responsibilities but also those relating to the GHA function.
- (d) employees of a shipper of only class 3 flammable liquids and class 8 corrosive substances need only be instructed in consignment of those substances.

7.3 It is recognised that an employee, especially in relatively small operations, may have a number of responsibilities. For example, the pilot of an aircraft operating into remote areas may have additional responsibilities to those normally associated with flight crew duties. The pilot may also be responsible for acceptance and examination of cargo (non-dangerous goods and/or dangerous goods) and passenger's baggage because of the non-availability of qualified GHAs. That pilot may undertake a single approved course meeting the requirements of the regulations enabling all of those duties to be carried out.

7.4 Annex A to this Advisory Circular is a matrix listing the syllabus items for dangerous goods training courses which are required to be approved by CASA. Annex B is a matrix listing the syllabus items for dangerous goods training courses which may be conducted without approval, subject to the instructor being qualified (see Qualifications of Instructors) and the relevant syllabus items being covered. Each matrix provides advice of which syllabus subjects are required to be undertaken by employees with different duties and responsibilities. (The syllabus of training for operator employees in Tables 92.135-1 and 92.135-2 includes "the purpose, contents and distribution requirements of the operator's dangerous goods manual". This is intended to cover the requirements relating to a dangerous goods manual rather than the specific content. Regulation 92.055 requires that operators take steps to ensure employees are made aware of the content of the operator's dangerous goods manual relevant to their duties before the employee first performs the duties. It is not mandatory that the requirement of 92.055 be met on a training course, but operators may choose this method. Operators should note, however, that the specifics of their manual would only be covered in a course if they have made arrangements with the course provider.) Each matrix has also identified various duty/responsibility combinations and named common titles of employees. However, advice should be sought from CASA where a particular circumstance is not covered in the matrix or where further information is required.

7.5 After initial training, and within two years of receiving that training, an employee may undertake recurrent or "refresher" training. These "refresher" training courses may be abbreviated and should be designed to refresh knowledge and update employees on technical, procedural or company policy changes since the employee was last trained. Where the initial course required CASA approval, the "refresher" course will also require approval. Where an employee has not undertaken training within the two year interval provided by the regulations, the employee should attend another initial course.

8. HOW TO APPLY FOR CASA APPROVAL OF DANGEROUS GOODS TRAINING COURSES AND INSTRUCTORS

8.1 It is important that applicants for approval ensure their applications reflect the applicable requirements of Part 92. This is particularly so for applicants who held approvals under the previous regulations, as their course content and references will probably now differ. Applications should be made in writing to CASA, as follows:

- (a) applications from NSW or ACT - Airline Office, Sydney;
- (b) applications from Victoria and Tasmania - Airline Office, Melbourne;
- (c) applications from Queensland - Airline Office, Brisbane;
- (d) applications from WA, NT and SA - Airline Office, Perth.

8.2 Applications should contain the following information:

- (a) a clear concise statement identifying the duties and responsibilities of the employees for whom the course is intended. For example:
 - (i) Group A employees of general aviation/airline operators; ie, operators employees responsible for acceptance of dangerous goods;
 - (ii) Group B employees of general aviation/airline operators; ie, employees responsible for acceptance of non-dangerous cargo.
 - (iii) Group C employees with Group B responsibilities as well; ie, flight crew with responsibilities for acceptance of non-dangerous cargo;
 - (iv) Group A employees of domestic/international freight forwarders; ie, employees with responsibility for acceptance of dangerous goods (and, if applicable, acting as GHAs for operator/s);
 - (v) Group A and Group B employees of GHAs; ie, employees responsible for accepting dangerous goods/non dangerous goods on behalf of operator/s;
 - (vi) Group D employees of an operator; ie, cabin crew;
 - (vii) Group F employees consigning Class 3 and Class 8 liquid dangerous goods, ie, employees of shippers of dangerous goods.
- (b) course content as it relates to the syllabus at Table 92-135-1 in the regulations. Further guidance is provided at Annex A;

Note: The order in which the syllabus items are listed in the Annex is to align it with the sequence in the regulations. It is not intended that this should necessarily be the order in which the syllabus items are instructed.

- (c) whether the course is intended as initial or refresher training;
- (d) course examination details including sample examination papers as applicable;
- (e) course duration in days or hours of instruction;
- (f) where it is intended to conduct the course;
- (g) identification of the intended instructor(s) including qualifications and relevant experience;

- (h) a sample copy of the certificate to be issued to the students, in accordance with the requirements of CASR 92.135. The certificate should, as a minimum, provide the information required by 92.145(2)(b)(i) and (ii). (Where the ‘deeming’ provision of 92.090 is used, the certificate should clearly indicate the actual date the training was conducted and the date the training is deemed to have been conducted.)

Note: While the regulations require a course must provide for the issue to each person who successfully completes a dangerous goods training course of a certificate stating that he/she has done so, it is not intended that this would necessarily require each person to be issued with their own individual certificate - although some course instructors may choose to do so. Students may be issued a copy of a certificate with multiple names on it. Further, it is envisaged that the certificate might consist of a letter covering all of the matters required to be on the certificate with a list of names of the successful students, with each successful student receiving a copy of the letter.

- (i) as dangerous goods training courses may be subject to compliance monitoring by CASA, an undertaking to notify CASA, in advance, of the dates of planned courses as well as acknowledgment of the compliance monitoring requirement.

8.3 If the course is to be conducted by correspondence or a distance education method, a full course package, as is intended for issue to students, together with full details of course control procedures and identification of course controller(s) should be provided. Applicants considering applying for approval of a dangerous goods “acceptance” course by one of these methods should be aware of the potential difficulties associated with meeting CASA’s standards for these courses as well as ensuring that the technical content is always up-to-date. CASA should be consulted before proceeding with development of these courses.

8.4 Before a dangerous goods training course is approved, CASA must be satisfied that the standard of the course will enable an employee, on completing the course satisfactorily, to carry out the assigned duties and responsibilities effectively. Therefore, not only must CASA be satisfied that the course content offered is in accordance with the duties and responsibilities of the employees to be trained, but also that the nominated instructor is able to impart the required knowledge.

9. QUALIFICATIONS OF INSTRUCTORS

9.1 Approved courses

It is highly desirable that any instructor nominated be experienced in cargo and dangerous goods operations relevant to the level of instructor approval applied for. Formal instructor qualifications, such as Certificate IV or ‘train the trainer’, are recommended. The minimum formal qualification required of an instructor nominated to instruct on any course for which approval of CASA is required, is the satisfactory completion of an approved dangerous goods “acceptance” course in the previous two years, that is, a course for Group A employees. However, CASA may waive these requirements if satisfied that the applicant has other compensating equivalent qualifications and/or experience. Instructors are expected to have a good working knowledge of the CASA legislation and

technical publications applicable to the courses being instructed, and applicants may be tested on that knowledge during the initial application or ongoing monitoring phases.

9.2 Courses not requiring approval of CASA

Persons instructing employees on dangerous goods training courses which do not require the approval of CASA are, similarly, not required to be approved. However, those persons should themselves have undertaken an approved course for either Group A or Group B employees before instructing.

10. DURATION OF COURSE AND INSTRUCTOR APPROVALS

To ensure that approved dangerous goods training courses are kept up to date and appropriate for use, and that instructors maintain their skills, approvals issued by CASA for both the course and the instructor may have a limited period of validity. It is expected course content will be changed to reflect amendments to CASA legislation and ICAO or IATA publications as they take effect, and such changes do not require further CASA approval during the validity period of the approval. Instructors and persons responsible for approved courses should ensure that they apply to CASA for renewal/reapproval of the course or instructor at least 30 days before the expiry of the approvals. This is to allow CASA sufficient time to consider the application and, if appropriate, issue new course or instructor approvals. CASA will not notify an organisation or individual of the impending expiry of approvals.

11. CURRENCY OF INSTRUCTORS

Holders of approvals to instruct on a dangerous goods training course should remain current. This can be achieved by either instructing all syllabus subjects relevant to the course for which an instructor's approval is held or by completing satisfactorily a relevant approved course, as a student, within the previous two years. Instructors on courses for which an approval is not required, who do not hold an approval from CASA to instruct on an approved course, should, unless granted an exclusion under 92.155, have completed satisfactorily an appropriate approved course within the two years prior to instructing.

12. WHAT RECORDS SHOULD BE KEPT?

12.1 Dangerous goods training records should be maintained by operators, GHAs, freight forwarders, shippers of dangerous goods and screening authorities. Employers should clearly establish the method for the maintenance of records, and clearly establish who is responsible for that maintenance. Records maintained by employers, particularly those with many employees, should have the ability to quickly establish the training status of a group of employees at a given location, or of a particular classification of employees, such as group E or group B employees. These records, which should be available at the employee's place of employment, should include:

- (a) the names of the employees who undertake the training;
- (b) the name of the person conducting the training and that person's organisation;
- (c) a reference to the training material used to meet the training requirements, e.g., CASA's approval instrument number (if an approved course); and
- (d) the date(s) the training was conducted. (Where the 'deeming' provision of 92.090 is used, the record should clearly indicate the actual date the training was conducted and the date the training is deemed to have been conducted.)

Records may be kept electronically provided hard copy can be provided.

12.2 The employer should retain a copy of any certificate required by 92.135(5) issued to an employee. Provision should be made for the issue to the employee of a copy of the certificate where the employee ceases employment.

12.3 Independent dangerous goods training organisations holding dangerous goods training course approvals should maintain detailed records of all persons trained for at least three years.

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DANGEROUS GOODS SYLLABUS OF TRAINING — APPROVED COURSES

Syllabus item	Subject	Operator's employees						Ground handling agent's employees		Freight forwarder's employees		Shipper's employees
		Cabin crew	Cargo staff		Flight crew and load planners			Accepting DG	Accepting cargo (non-DG)	Accepting DG	Accepting cargo (non-DG)	
			Accepting DG	Accepting cargo (non-DG)	Operator carries DG	Combined flight crew and cargo (non-DG) acceptance	Operator does not carry DG as freight					
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
1	The Act and Regulations with emphasis on the relationship between CASRs and ICAO/IATA and Statement of Contents provisions of CASR 92.070 and 92.075	X	X	X	X	X	X	X	X	X	X	X
2	Dangerous goods manual: . purpose contents and distribution;	X	X	X	X	X	X	X	X	X	X	X
3	Kinds of cargo/passenger's baggage likely to be DG	X	X	X	X	X	X	X	X	X	X	X
4	Methods used to identify cargo which could be DG		X	X		X		X	X	X	X	
5	Risk to aircraft and occupants associated with each of the nine classes of DG	X	X	X	X	X	X	X	X	X	X	X
6	General philosophy on carriage of DG	X	X	X	X	X	X	X	X	X	X	X
7	DG forbidden under any circumstance		X		X	X		X		X		X
8	a. General applicability b. General transport requirements	b. only	X	b. only	X	X	b. only	X	X	X	b. only	X
9	DG of the operator	X	X	X	X	X	X	X	X			
10	DG in air mail		X	X	X	X	X	X		X	X	
11 and 12	DG in excepted/limited quantities		X		X	X		X		X		X
13	Definitions	X	X	X	X	X	X	X	X	X	X	X
14	Classification of DG	X	X		X	X	X	X		X		X

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
15	The dangerous goods list: a. information provided in the list; b. abbreviations used; c. n.o.s. entries		X	X	X	X		X	X	X		X
16	Packing instructions including general packing requirements		X					X		X		X
17	Shipper's responsibilities: a. general; b. package markings; c. package labelling; d. identification of labels; e. documentation (shipper's declaration)	d. only	X	d. only	d. only	d. only	d. only	X	d. only	X	d. only	X
18	Operator's responsibilities: a. acceptance procedures; b. storage, loading and segregation; c. provision of information to Pilot-in- Command (NOTOC); d. emergency procedures	d. only	X	d. only	b.c.d only	b.c.d only	d. only	X	d. only			
19	Packagings: a. nomenclature and codes; b. markings and what they mean; c. requirements; d. performance tests		X					X		X		X
20	Provisions concerning passengers and crew, including information to passengers	X	X	X	X	X	X	X	X	X	X	X
21	Proper shipping names		X		X	X		X		X		X
22	State and operator variations	X	X		X	X	x	X				
Syllabus items marked X should be instructed												

Relevant
classes
consigned
to

DANGEROUS GOODS SYLLABUS OF TRAINING — COURSES NOT REQUIRED TO BE APPROVED

Syllabus item	Subject	Screening Authority's employees	Operator's employees		Ground handling agent's employees		Freight forwarder's employees
		Security Screeners	Porters/acft loaders/pick-up drivers	Passenger Service Officers	Porters/acft loaders/pick-up drivers	Passenger Service Officers	Employees handling cargo but without responsibility for acceptance of cargo
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
1	The Act and Regulations	X	X	X	X	X	X
1A	Statement of contents provisions of the regulations at CASR 92.070 and 92.075		X		X		X
2	The operator's Dangerous Goods Manual . purpose contents and distribution		X	X	X	X	X Only if acting as ground handling agent
3	Kinds of cargo/passenger's baggage likely to be dangerous goods		X	X	X	X	X
4	Methods used to identify cargo containing dangerous goods		X		X		X
5	Effect on aircraft of each class of dangerous goods		X		X		
6	General philosophy on carriage of dangerous goods	X	X	X	X	X	X
7	Exceptions for dangerous goods of the operator		X		X		
8	Definitions		X	X	X	X	X
9	The nine classes of dangerous goods		X	X	X	X	X
10	Recognition of dangerous goods labels	X	X	X	X	X	X
11	Storage and loading of dangerous goods		X		X		
12	Provisions concerning passengers and crew	X	X	X	X	X	X
13	Relevant State and operator variations	X		X		X	
Syllabus items marked X should be instructed							