

Carriage of Persons on All-Cargo Aircraft

BACKGROUND

It has come to the Federation's attention that Cargo Aircraft Only (CAO) provisions are being used to prevent individuals from traveling on cargo aircraft when such aircraft carry Dangerous Goods (DG) not allowed on passenger aircraft. The CAO provisions allow types and quantities of DG on all-cargo aircraft because it was believed pilots of those aircraft had specific means of responding to DG incidents that are not normally available to passenger aircraft pilots.

As stated in international aviation Standards, the role of the DG regulatory structure is to *ensure that, should an incident occur, it cannot lead to an accident*. It should not be to determine which persons are allowed onboard commercial transport aircraft (both passenger and all-cargo). The determination of who can be onboard and what safety briefings and demonstrations are required should be covered by other parts of aviation Regulations such as airworthiness, security, and operations.

The definitions of **cargo aircraft** and **passenger aircraft** are based on aircraft types and operating procedures that were developed decades ago when the type and quantity of DG transported and the aircraft in use were very different than in today's commercial aviation system. Both the risk profile and risk mitigation possibilities have evolved, but the definitions and the underlying safety assumptions have not. The result is a DG regulatory structure that arbitrarily limits who can be on board all-cargo flights, while not accomplishing the original goal of one level of safety for all commercial flight operations (both passenger and all-cargo).

POSITION

Dangerous Goods Regulations should not have the effect of preventing persons in addition to the operating crew from being allowed to fly onboard commercial transport aircraft (both all-cargo and passenger). The decision to accept such persons onboard should be left to the pilot-in-command, subject to operational approval.

For the IFALPA position on the transport of DG by air and one level of safety for all commercial flight operations, see [IFALPA Position Paper 15POS06 Transport of Dangerous Goods by Air](#).