



**AIRLINE USERS RIGHTS
AND GRIEVANCE REDRESSAL FORUM**

EKM/TC/360/2023

AURGRF/G-25/MC/DGCA/GSR

2nd July 2025

**The Director General
Directorate General of Civil Aviation (DGCA)
New Delhi – 110003**

Subject: Objections and Urgent Request for Revision of Dangerous Goods Handling Notification (G.S.R. 397(E) dated 18 June 2025)

Respected Sir,

We, the **Airline Users Rights and Grievances Redressal Forum (AURGRF)**, respectfully submit this representation to express our serious concerns regarding the Ministry's Dangerous Goods Handling Notification dated 18 June 2025 (G.S.R. 397(E)), and to urge immediate corrective action to uphold passenger safety and regulatory compliance.

As a signatory to the Chicago Convention and under Annex 18 (Safe Transport of Dangerous Goods by Air), India is legally required to adopt and enforce ICAO provisions. Specifically, ICAO Doc 10147 (2021) mandates all States to implement a national Competency-Based Training and Assessment (CBTA) framework for personnel engaged in air transport of cargo, mail, passengers, and baggage. This framework, effective January 2023, represents a shift from traditional category- and title-based training to a function-based model aligned with specific job roles and responsibilities—a transition that India has yet to adopt and implement within its national regulatory framework.

Key Features of the ICAO Doc 10147 CBTA Model include:

- Employers and operators bear responsibility for ensuring personnel are trained, assessed, and competent in their assigned dangerous goods functions.
- Employees are personally accountable for compliance within the scope of their duties.
- Training programs must be integrated with the operator's Safety Management System (SMS) as required by ICAO Doc 9284, and operators are fully responsible for ensuring that their contracted ground handling and third-party service providers also meet the same training and compliance standards.
- DG training scope expanded and mandated awareness of emergency response procedures to all.

National Regulatory Responsibilities under ICAO Doc 10147 require States to:

- Define job functions, eligibility criteria, training content, competencies, proficiency levels, and assessment standards at the national level.
- Clearly allocate responsibilities among employers, operators, training providers, and regulatory authorities. Including all stakeholders in air transportation.
- Ensure all DG training aligns with ICAO Technical Instructions (Doc 9284) and Procedures for Air Navigation Services — Training (PANS-TRG, Doc 9868).

We respectfully urge your good office to consider our serious concerns and to intervene by revoking the current Civil Aviation Requirements dated 25th January 2023 and amending the Aircraft (Carriage of Dangerous Goods) Rules, 2003 to incorporate the provisions of ICAO Doc 10147 and the Technical Instructions (Doc 9284).

Despite multiple interventions, including a question raised in the Lok Sabha by Shri N.K. Premachandran, MP (8 August 2024), a detailed memorandum submitted by AURGRF to the Secretary, MoCA (22 November 2024), a Delhi High Court directive on the PIL (19 February 2025), and a follow-up meeting with the Hon. Civil Aviation Minister led by Shri Premachandran (19 March 2025)—the critical regulatory gaps remains unaddressed, compromising both passenger safety and operational compliance.

Airline Users Rights and Grievances Redressal Forum (AURGRF)

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Global Best Practices: Countries including the UK, Canada, Germany, Australia, Singapore, and the UAE have adopted IATA's structured CBTA model (Dangerous Goods Training Guidance, edition-1, 2023), established Dangerous Goods Regulatory Boards, integrated SMS accountability, and enforced employer responsibility for dangerous goods handling. India's continued reliance on the flawed CAR dated 25 January 2023 — without a national CBTA framework or clear competency guidelines — exposes the aviation sector to significant safety and legal risks.

Our Recommendations for Immediate Action:

1. Withdraw G.S.R. 397(E), revoke the flawed CAR dated 25 January 2023, and amend the Aircraft (Carriage of Dangerous Goods) Rules, 2003 to fully align with ICAO Doc 10147, ICAO Technical Instructions (Doc 9284), and IATA's CBTA standards.
2. Issue national CBTA guidelines, as mandated by ICAO Doc 10147 (Ch. 1.1.1 & 1.1.2), clearly defining roles, responsibilities, training content, eligibility criteria, proficiency levels, competencies, and assessment standards for all personnel involved in air transport of cargo, mail, passengers, and baggage.
3. Hold employers and operators accountable for designing, delivering, and verifying role-specific training and demonstrated competence, whether internally or via qualified third parties, consistent with ICAO Doc 10147 (Ch. 1.4.1.1).
4. Mandate integration of dangerous goods handling into operators' Safety Management Systems (SMS) and enforce accountability for contracted ground handlers, per Part 7 of ICAO Doc 9284.
5. Establish a dedicated Dangerous Goods Regulatory Control Board, composed of industry experts, to oversee training, compliance, and policy aligned with ICAO and IATA standards.
6. Define and enforce training requirements and operational procedures for radioactive materials handling, consistent with ICAO Technical Instructions, AERB safety codes, and IATA's Dangerous Goods Regulations.

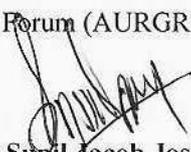
These reforms are critical to protecting the traveling public's safety and upholding their fundamental right to safe air transport. Delays in action risk perpetuating dangerous goods hazards with severe consequences for lives, legal liability, and India's international standing.

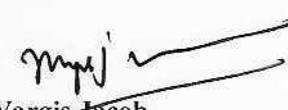
We respectfully urge your immediate attention and positive action to align India's regulatory framework with global aviation safety standards and demonstrate strong regulatory leadership.

Sincerely,

For Airline Users Rights and Grievances Redressal Forum (AURGRF) Executive Committee


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- Copy: 1. Hon Member of Parliament Shri N.K. Premachandran (Chief patron – AURGRF)
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