

## Carriage of Persons on Cargo Aircraft

### NOTE

*This paper supersedes 19POS10 – Carriage of Persons on All-Cargo Aircraft. For IFALPA's position on the transport of DG by air and one level of safety for all commercial flight operations, see [15POS06](#).*

### BACKGROUND

ICAO Doc 9284 (Technical Instructions for the safe transport of Dangerous Goods by air), limits the number of persons allowed to travel on cargo aircraft when such aircraft carry Cargo Aircraft Only (CAO) freight, i.e., freight not allowed on passenger aircraft. ICAO provisions allow certain types and quantities of Dangerous Goods (DG) on cargo aircraft because it is believed that the pilots of those aircraft have 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 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 ICAO 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 cargo flights, while not accomplishing the intent of one level of safety for all commercial aircraft operations (both passenger and cargo), as indicated in the Foreword of ICAO Doc 9284.

### 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 cargo and passenger). The final decision to accept any persons onboard should be left to the pilot-in-command.