European Helicopter Association

Position Paper on a Proportionate Approach to Dangerous Goods Regulations for Helicopter Operations

Executive Summary

EASA's current Dangerous Goods (DG) regulatory framework mirrors ICAO Annex 18 and the Technical Instructions, but its full application to small helicopter operations is disproportionate. These operators—typically engaged in SPO, training and maintenance flying—face burdensome documentation, training, and approval requirements designed for airline-scale DG transport.

This paper proposes an ICAO-compliant "DG Lite" alternative framework for small rotorcraft operations that maintains safety standards while introducing proportionality. The goal is to reduce unnecessary administrative burden, improve compliance, and preserve the spirit of Annex 18 flexibility for low-risk operations.

1. Background

EASA's DG framework under Part-SPO, Part-NCC, and associated AMC/GM ensures international consistency but results in excessive cost and complexity for small helicopter operators. These aircraft seldom carry DG for commercial transport; instead, DG items such as maintenance aerosols, small fuel samples, and lithium batteries are carried incidentally to their principal task. Proportional regulation is therefore warranted.

2. Objective

To establish an ICAO-compliant, risk-based alternative framework for DG carriage by small helicopter operators that upholds safety while aligning with operational realities.

3. Proposed Alternative Framework

The proposed "DG Lite" framework applies to small helicopters (CS-) engaged in non-commercial or limited commercial operations. It aligns with ICAO Annex 18, Chapter 1.1.3 and Doc 9284, Part 1, Chapter 1.2, which allow States to apply variations or simplified rules where DG carriage is not the primary activity.

Area	Current EASA Requirement	Proposed Simplified Approach
Approval	Formal DG approval	Self-declaration of DG

	required (ORO.GEN.110 / Part-SPA.DG)	awareness for operators below 3,175 kg MTOW
Training	Full recurrent DG training syllabus	One-hour DG Awareness module focused on identification, packaging, and emergency actions
Documentation	Dedicated DG procedures manual	DG appendix integrated into Operations Manual (template provided)
Marking/Packaging	Full ICAO Technical Instructions compliance	Use of manufacturer's original or UN-approved packaging for limited quantities (<5 kg total)
Recordkeeping	Formal load documentation and NOTOC	Simplified DG Record Form retained for 2 years; no NOTOC required for pilot-only flights
Exemptions	Case-by-case national approval	General blanket exemption for DG Lite carriage under ICAO Table 1-1

4. Safety Assurance

Safety will be maintained through a combination of practical controls:

- Mandatory checklist item confirming carriage limited to DG Lite list.
- Secure stowage of all DG items away from occupants.
- Annual self-audit (standard form template to be provided).
- Mandatory occurrence reporting under Regulation (EU) 376/2014 in case of DG incidents.

5. Expected Benefits

- Proportionate oversight for low-risk, small-scale operations.
- Reduced administrative and training burden.
- Increased voluntary compliance due to clarity and practicality.
- Maintains ICAO Annex 18 alignment and intent.
- Supports safe, sustainable and efficient helicopter operations.

6. Next Steps

EHA members are invited to endorse this proposal for submission to the EASA Rotorcraft and GA Department. It is recommended to establish a joint EHA–EASA Working Group on “DG Proportionality in Light Rotorcraft Operations” to refine and implement a DG Lite framework within Part-SPO/Part-NCO guidance material.

Annex: Example DG Lite List (for own-use carriage)

- Aerosol cans (lubricants, cleaners) – max 500 ml each
- Lithium batteries (installed in equipment)
- Small fuel samples (<500 ml)
- First aid kit materials
- CO_2 cylinders for lifejackets or extinguishers
- Paints, adhesives, sealants (<1 L total)
- Portable electronic devices