

# Consultation on the update to CAP 483; Training on the Safe Carriage of Dangerous Goods by Air

## We Asked

On the 3 February 2026 the UK Civil Aviation Authority (CAA) published a Consultation on the update to CAP 483; Training on the Safe Carriage of Dangerous Goods by Air ('the consultation').

In the consultation the CAA set out the means by which it meets its obligations under the Air Navigation (Dangerous Goods) Regulations 2002 for those delivering or providing Dangerous Goods by Air Training.

The consultation sought stakeholder views on the updates to CAP 483, including:

- How clear and understandable are the proposed updates to CAP 483?
- Does the updated document provide adequate guidance for developing, delivering, and assessing dangerous goods training?
- Are the expectations for specialised areas of training adequate and up to date?
- Are the proposed requirements for assessing competency clear and practical?
- Whether CAP 483 provide sufficient guidance on the acceptability of online/e-learning and classroom training?
- Are the requirements for demonstrating compliance with CAP 483 sufficiently clear?
- Do training providers understand what documentation must be maintained)?
- What challenges may be faced in implementing the revised CAP 483?
- Whether there are areas of dangerous goods training that CAP 483 should cover but currently does not?

A total of 11 responses were received from both individuals and organisations. The CAA has provided responses addressing the key themes identified across these submissions. Where feedback fell outside these common themes, or related to specific organisational or individual circumstances, the CAA has responded directly to those parties.

## You Said:

The Foreword indicates CAP 483 “provides policy and guidance” and “does not itself constitute regulations”. From experience of running approved training schemes for over 20 years, this is not interpreted as guidance by the CAA during the biannual reapproval process. It is treated as a regulation, with training providers expected to follow CAP 483 to the letter.

It would be beneficial to clarify in CAP 483 what areas are guidance. The UK Health and Safety Executive produce guidance documents to support regulations, which includes the regulation, approved code of practice and guidance.

## We Responded:

CAP 483 is intended to provide policy and guidance to support compliance with the applicable legislative framework, including the Air Navigation (Dangerous Goods) Regulations 2002. It is not a legislative instrument. However, in practice, elements of CAP 483 reflect the CAA’s established means of compliance with those regulations.

During approval and oversight activities, including biannual approval, the CAA assesses whether training providers meet the required standards. Alignment with CAP 483 is one means of demonstrating compliance as it sets out the CAA’s interpretation of regulatory expectations and acceptable methods of meeting them.

Where CAP 483 is applied in a manner that appears prescriptive, this is generally because the provisions in question are closely linked to underlying regulatory requirements or internationally agreed standards, including those set out by the International Civil Aviation Organization. In such cases, adherence to the guidance provides a clear and efficient route to demonstrating compliance.

That said, CAP 483 is not intended to preclude alternative approaches.

Organisations may propose different methods, provided they can demonstrate that these achieve an equivalent standard. Such approaches are considered on a case-by-case basis.

## You Said:

The UK Civil Aviation Authority received a number of responses to the consultation in relation to Dangerous Goods by Air training, requesting further clarification in several areas of CAP 483 relating to competency-based training and assessment, including:

- Employers’ responsibility to develop a dangerous goods training program;
- competency assessment intervals;
- general familiarisation training (previously referred to as awareness training);
- training requirements for electronic mobility aids;
- the availability of dangerous goods training templates;

- expectations for recurrent training;
- competency assessments for instructors;
- clarification on which training requires CAA approval; and
- the application of competency-based training and assessment (CBTA).

## **We Responded:**

From a regulatory perspective, the position taken in CAP 483 reflects how the CAA has chosen to exercise oversight within the UK system, rather than a direct restatement of the structure set out in the International Civil Aviation Organization (ICAO) Technical Instructions for the Safe Transport of Dangerous Goods by Air (TI).

The ICAO framework places primary responsibility on the employer to establish and maintain a dangerous goods training programme, ensuring that personnel are trained and assessed commensurate with the functions for which they are responsible. However, it also gives States discretion in how they oversee compliance with these requirements.

In the UK context, this oversight has been extended to include training providers where they design and deliver dangerous goods training courses that may be used by third parties. The rationale is that, although the employer remains accountable for the overall training programme, the content, structure, and delivery of training may be delegated in practice.

The absence of explicit reference to the employer in this context does not remove the employer's responsibility under the TI ; rather, it reflects that CAP 483 is focused on areas where the CAA has determined that direct approval or oversight is necessary to support compliance across the system.

Dangerous goods training is required to be completed every 24 months. Within this period, employers are responsible for ensuring that personnel are competent for the functions they perform.

In accordance with the TI , responsibility rests with the employer to ensure that personnel are trained in line with their duties. For this reason, the CAA does not provide standardised templates for general familiarisation training, as training must be commensurate with the functions for which staff are responsible.

To remain aligned with the TI , instructors delivering initial or recurrent dangerous goods training are expected to remain current. This must be demonstrated by delivering dangerous goods by air training within each 24-month period or, where this is not the case, by completing recurrent training.

Under a competency-based approach, and as specified in CAP 483, instructor competence should normally be internally assessed on an annual basis, unless an alternative arrangement has been agreed with the CAA. We have published an

instructor competency matrix in Appendix 2 of CAP 483, which is used in the approval of instructors (as required under the Air Navigation (Dangerous Goods) Regulations 2002). Its use is also recommended more broadly within industry when assessing instructor competence.

The CAA would also like to emphasise that, where training is delivered by a third party, responsibility for CBTA remains with the employer, regardless of whether the training itself is subject to CAA approval or forms part of general familiarisation.

Further clarification on which training requires CAA approval is provided in the flowchart on page 11 of CAP 483.

For additional guidance on competency-based training and assessment, reference should be made to ICAO Doc 10147.

### **You Said:**

Part B, Chapter 2.15 e) requires new exam papers to be produced annually using different questions from the previous year, with previous exam questions not being allowed to be repeated within 36 months.

Annual production of exam papers is unnecessary and places an unjustified burden on training providers.

### **We Did:**

The CAA has recently engaged with providers of approved dangerous goods by air training (under the training approval scheme) to run working groups for the collaborative creation of examination papers for approved dangerous goods by air, batteries by air, and radioactive goods by air training.

As part of these working groups the CAA will approve and maintain oversight of examination papers for approved courses (under the training approval scheme).

As a result of this oversight, the CAA expects that permission will be granted for the use of these examination papers for a 24-month period, the conditions for which will be agreed within the working groups (the newly collaboratively created examination papers will be made available to all training providers who hold a CAA approval under the training approval scheme and the CAA will retain control of these documents with working groups set up biennially to update them).

Those wishing to continue to create their own examination papers for courses approved via the training approval scheme (including derivative courses) are expected to continue to create new and unique examination papers annually.

### **You Said:**

The CAP does not provide sufficient detail on the supporting students with additional learning needs (ALN).

## **We Did:**

The CAA has considered the feedback provided by organisations and training providers and has updated CAP 483 with a new item in Part B; 5.10

CAP 483 intentionally does not prescribe specific methods for supporting students with additional learning needs. This reflects an understanding that such needs are often varied and complex, and that a standardised, one-size-fits-all approach would not be appropriate.

Individuals with similar identified learning needs may require different types of support depending on their circumstances, learning styles, and the context in which training is delivered. As a result, overly prescriptive requirements could unintentionally limit a training provider's ability to respond effectively to those individual needs.

Instead, the CAA expects training providers to take a flexible and inclusive approach. This includes identifying and implementing reasonable adjustments where appropriate, to ensure that all learners can access and complete training effectively.

Such arrangements should be clearly defined within the training provider's own policies and procedures, demonstrating how additional learning needs are identified, assessed, and supported in practice. This approach allows providers to tailor support to the individual while maintaining compliance with overarching regulatory expectations.

## **You Said:**

The requirements for instructor approvals are too prescriptive and counter intuitive to the development of instructors and burden approved training providers with significant additional costs.

## **We Did:**

The CAA has considered the feedback provided by organisations and training providers and has amended Part B, 2.26 of CAP 483 to permit Part 1 qualified instructors to deliver approved dangerous goods training unsupervised once an assessment of competence has been conducted by the CAA as part of the Part 2 Instructor approval, and for a period no greater than 6 months which will be confirmed in writing by the CAA when providing feedback on the instructor observation.

## **You Said:**

The provisions for the use of +1 IATA DGR Manuals for training purposes are overly prescriptive and difficult to implement.

## **We Did:**

The CAA has considered the feedback provided by organisations and training providers and has amended the requirements associated with the use of +1 IATA DGR Manuals for training purposes.

Specific conditions are attached, which are detailed in Part B, 2.9 and Appendix 4 of the revised CAP 483.

In addition to the above points the CAA has also made several editorial changes. These changes do not affect the intent of the CAP but have been made as a result of the feedback from those responding to the consultation to provide greater clarity or closer alignment to the regulations.

## **You Said:**

Giving students generic feedback on their exam paper is counterintuitive, students can see specifically how or where an error has been made if they can see the error/omission that they have done by physically looking at their paper. The instructor/assessor can then give specific feedback to ensure that the student fully understands how to answer or where to find the relevant information to ensure that they will be aware and compliant in the future.

## **We Did:**

The CAA agrees that in accordance with CBTA principles students should be provided with more detailed feedback to enable them to identify and develop the skills associated with the functions for which they are responsible.

Part B, 4.5, Provision of Feedback has been updated to allow providers of approved training to give specific feedback to students following examination. Conditions are attached to the provision to ensure the security and integrity of the assessment papers is not compromised.

The CAA has also made an amendment to Part B, 4.6, Keeping Copies of Exam Papers. This section now includes a need for training providers to include the date of marking, name and signature of the instructor marking them included in the exam paper.

The CAA would like to thank all those that contributed to the public consultation of CAP 483.