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**BELIZE**  
 DEPARTMENT OF CIVIL AVIATION  
 AERONAUTICAL INFORMATION SERVICE



**AIC**  
**C018/24**  
**9<sup>th</sup> October 2024**

**REVIEW OF DRAFT REGULATION FEEDBACK FOR BELIZE CIVIL AVIATION REGULATION 18 THE SAFE TRANSPORT OF DANGEROUS GOODS BY AIR (ISSUE 3 REVISION 0)**

The Belize Department of Civil Aviation hereby advises the stakeholders that the consultation period for Belize Civil Aviation Regulation 18- The Safe Transport of Dangerous Goods by Air has concluded. The following concerns have been reviewed and addressed where applicable in accordance with Annex 18 and Doc 9284 Technical Instructions (2023-2024).

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<b>No.</b>	<b>REGULATION</b>	<b>SECTION</b>	<b>FEEDBACK</b>	<b>ACTION TAKEN</b>
1	BCAR 18	1	Reference error, it should be BCAR-18, not BCAR-13.	The BDCA has revised and BCAR 18 is reflected
2	BCAR 18	18.01(Applicability)	We do not see a provision for AOC's who are Will-Not-Carry.	The BDCA will contact the operator directly to discuss what provision is being sought as a Will-Not-Carry Operator
3	BCAR 18	BCAR 18.20 (Exceptions)	What is CA?	The BDCA has revised and BCAR 18 will reflect CA as "Civil Aviation"
4	BCAR 18	BCAR 18.55 Requirements for approval	The phrase "subject to any condition he thinks fit" does not make sense in the context in which it is	The phrase "subject to any condition he thinks fit" has been changed to the BDCA.

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			<p>being used. It is recommended to change that phrase to “subject to any conditions defined by the civil aviation authority.”</p> <p>What process will BDCA use to determine what those necessary conditions for the exemption are?</p>	<p>THE BDCA uses AIC Series C Exemption Procedures to BCAR’S as well as the TI DOC 9284 for exemptions processes.</p>
5	BCAR 18	BCAR 18.65 Carriage of dangerous goods	<p>How should Will-Not-Carry operators be addressed? This set of regulations seems to imply that all AOCs are required to be Will-Carry operators</p>	<p>BCAR 18 is not implying that all AOCs are required to be Will Carry Operators kindly reference 18.65 Carriage of Dangerous Goods (a).</p> <p>NOTE: Will- Not - Carry means that the certificate holder is prohibited from transporting dangerous goods in its OPSpec, based on that, the certificate holder is permitted to transport cargo or COMAT that <u>does not</u> contain dangerous goods, with a general prohibition on transporting dangerous goods</p>

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				aboard the aircraft
6	BCAR 18	BCAR 18.250 Applicability	We require clarification on whether the “Corresponding manuals” referenced in item (a) refer to the company's manuals, specifically our OTP.	BCAR 18 has been revised to now reflect “in their manual system”
7	BCAR 18	Requirement for dangerous goods training.	What about Will-Not-Carry operators? Where is the guidance for the Will-Not-Carry training program? The current version of BCAR-18, in Annex 2 Subpart J, includes the training requirements for operators not carrying dangerous goods as cargo. However, we do not see this information in the proposed regulation	BCAR 18 preamble advises that the detailed specifications of this BCAR are found in Doc 9284 Technical Instructions. For Training Requirements Chapter 4 of the TI will provide detailed specifications.
<b>Feedback Reviewed by</b>		Dangerous Goods, Flight Standards Unit		
<b>Action Taken by</b>		Sumita Obrai (Dangerous Goods Inspector)		
<b>Date</b>		September 18 <sup>th</sup> ,2024		

In addition, the following changes were made in BCAR 18:

- Insertion Issue 3 Revision 0 into the preamble
- BCAR 18.35: Notification of Variations (b) was omitted
- BCAR 18.170: Separation, segregation, and securing (see Annex 1) has been changed to Annex 2
- BCAR 18.170 (a) (1): Annex 1 has been changed to Annex 2
- BCAR 18.245: Retention of documents has been changed from 1 year to 3 months
- BCAR 18.01 Applicability (a) (7) the word crew was inserted

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