



*Council on Safe Transportation of Hazardous Articles*

August 18, 2025

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**Shelby Geller**  
Security and Hazardous Materials Safety  
Office of Hazardous Materials Safety (AXH-520)  
Federal Aviation Administration (FAA)  
800 Independence Avenue, SW  
Room 300 East  
Washington DC, 20591

**Reference: Docket Number [FAA-2025-0493](#) | Clearance of Renewed Approval of Information Collection: Hazardous Materials Training Requirements**

Dear Mrs. Shelby Geller,

The Council on Safe Transportation of Hazardous Articles, Inc. (COSTHA) hereby submits comments to Docket No. FAA-2025-0493; Agency Information Collection Activities: Requests for Comments; Clearance of Renewed Approval of Information Collection; Hazardous Materials Training Requirements; Notice published in the Federal Register on June 17, 2025.

COSTHA is a not-for-profit organization representing manufacturers, shippers, distributors, carriers, freight forwarders, trainers, packaging manufacturers and others associated with the hazardous materials transportation industry. In addition to promoting regulatory compliance and safety in hazardous materials transportation, COSTHA assists its members and the public in evaluating the practicality and efficacy of laws, rules, and regulations for the safe transportation and distribution of hazardous materials. Among our members, COSTHA represents sixteen air carriers, representing the majority of carriers involved in the domestic and international carriage of passengers and cargo by aircraft.

**COSTHA and its members oppose the proposed change in title from “Hazardous Materials Training Requirements” to “Hazardous Materials Program Requirements”.** COSTHA member air carriers strongly oppose this change, which lacks a clear definition of “program” and threatens to significantly expand FAA oversight beyond training. This extension into air carrier policies, procedures, and operational manuals would impose unnecessary burdens without providing any demonstrable safety benefit. The concern is reinforced by language in the notice’s background and frequency sections, which state that “revisions of the hazardous materials manuals and training programs... must also be submitted... for approval.” COSTHA members note that under [14 CFR Parts 121](#) and [135](#), there is no codified requirement for FAA approval of revisions to hazardous materials training programs and manuals. Although many air carriers already work with FAA Principal Hazardous Materials Inspectors (PHIs) and Certificate Management Offices (CMOs) under a non-streamlined change-based review process for hazardous materials manuals, this language suggests a

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regulatory shift in oversight that could lead the FAA to reclassifying manuals that are currently only required to be “provided” to the FAA to be “approved” by the FAA, creating confusion, time consuming review processes and unnecessary compliance burdens. COSTHA member air carriers support retaining the existing training title and advocates for targeted improvements that promote standardization of processes and reduce unnecessary submissions—without expanding regulatory scope or imposing new administrative burdens.

### **Hazmat Training Program & Manuals Modification Requirements:**

COSTHA members have identified significant confusion stemming from two specific statements found in the *Background* and *Frequency* sections of the FAA’s notice. Members are seeking clarification regarding the regulatory basis for the following statements:

*“Background:* As prescribed in [14 CFR Parts 121](#) and [135](#), the FAA requires certificate holders to submit hazardous materials manuals and training programs as part of the FAA’s certification process. Revisions of the hazardous materials manuals and training programs must also be submitted following certification.”

*“Frequency:* Information is collected on occasion. Part 121 and 135 certificate holders submit their hazardous materials manual and training program during the initial certification process. When a certificate holder revises their manual or training program, they must submit the revised manual and training program to the FAA for approval.”

As noted previously, COSTHA members are concerned with the underlined text above and the requirement that revisions to hazardous materials training programs and manuals require FAA approval – an obligation that is not codified in 14 CFR Parts 121 or 135. Members believe the language in the notice is derived not from regulation, but from [Advisory Circular \(AC\) 121-40](#), specifically:

- **Chapter 2.4 – Dangerous Goods Training Program FAA Approval**, which states: “Regardless of the certificate holder’s decision to use this AC or not, the dangerous goods training program requires the approval of the FAA prior to implementation or modification.”
- **Chapter 3.5 – Manual FAA Approval**, which states: “The manual should clearly identify the person, with responsibility and authority for ensuring that the FAA is provided a copy of the manual, and for providing the FAA all updates. In accordance with the applicable operating certificate of the certificate holder, the manual requires the approval of the FAA prior to implementation.”

COSTHA members are particularly concerned that the underlined text above contains a distinction in FAA approval verbiage as it suggests that training materials and manuals are subject to different approval standards, while the verbiage within Background and Frequency sections of [FAA-2025-0493](#) does not contain this distinction in standards. In practice, however, the distinction between “approval” and “submission” is well established in FAA processes:

- **Training programs** are subject to a streamlined approval process, with updates requiring FAA review and sign-off **prior to implementation**.
- **Manuals**, on the other hand, are often only **submitted or provided** to the FAA or PHIs, with implementation allowed **without prior approval**—a process that varies in scope and enforcement across FAA regions and certificate management offices.

This distinct difference is critical to how carriers' structure and manage regulatory compliance processes. It is viewed that "provided" materials may be implemented without prior FAA authorization, while "approved" materials require FAA review and sign-off before any changes are to be finalized and implemented. If FAA were to treat DG manuals and operational documents as part of a broader "hazardous materials program" under the newly proposed framework, these documents could be brought under an approval regimen that is similar to training materials. This shift in oversight would subject even minor updates-such as formatting adjustments or terminology clarifications – to FAA review and approval, causing unnecessary delays, increasing administrative burden, and imposing unnecessary costs without any demonstrable safety benefit.

### **Standardized Process for Training:**

COSTHA members continue to experience inconsistent application of FAA oversight related to hazardous materials training. In some cases, PHIs require annual, slide-by-slide reviews of training materials. In others, oversight is limited to observing a class or reviewing web-based training upon request. These inconsistencies create unnecessary workload and inefficiencies for both carriers and FAA inspectors.

Member air carriers recommend the development and implementation of a standardized FAA review policy for hazardous materials training programs. A uniform approach would promote consistency, fairness, and efficiency across all certificate holders and provide clear expectations for both industry and regulators.

Another key area of concern is the lack of a standardized process for third-party handler training approvals. At many domestic and international locations, cargo acceptance responsibilities are performed by contracted service providers.

COSTHA proposes the adoption of a uniform approach that includes the following elements:

- Air carriers retain responsibility for reviewing and validating their handler's training programs and providing differences training specific to their operation.
- The FAA issues a letter of equivalency or acceptance for the handler's training programs.
- Only revisions to the training program (not full resubmission of the entire training program) are submitted for review.

This model would reduce redundancy, streamline the process, and eliminate repetitive FAA reviews of essentially identical material across multiple carriers.

### **OMB Control Number:**

COSTHA members question the procedural basis for this renewal and modification of OMB Control Number 2120-0705. It appears the FAA is repurposing an existing OMB control number, OMB Control Number: 2120-0705 and applying it to a broader "Hazardous Materials Program Requirements" collection. Historically this control number has been associated with unrelated topics, such as "Commercial Air Tour Operator Reports". This shift in scope has not been fully explained or justified in the notice, raising questions among COSTHA members about whether this intended change corresponds with the original approval for this information collection. Significant changes in scope, such as within this notice, should be clearly explained and evaluated before proceeding.

### **Burden Estimate:**

COSTHA members are concerned that the notice lacks sufficient transparency in its burden estimate calculations. While it provides the estimated average burden per response and the total annual burden hours for each certificate holder type, it fails to explain how these totals were derived.

For example, the FAA states an average of 6.08 hours per response and a total annual burden of 23,282 hours for Part 121 certificate holders. However, the notice does not disclose the number of affected carriers or the formula used to arrive at this total. In addition, the notice does not include any dollar cost burden, even though the Paperwork Reduction Act requires agencies to evaluate and present the economic impact of information collections. Without accurate calculations and complete cost data, the air carrier industry cannot verify or assess the reasonableness of the agency's estimates on the impact of this proposed change.

### **Recommendations:**

For the reasons outlined above, COSTHA urges the FAA to take the following actions prior to finalizing any changes associated with this information collection:

- Retain the current title of "*Hazardous Materials Training Requirements*" to avoid the unintended expansion of scope associated with the proposed "Hazardous Materials Program Requirements" title.
- Clearly define and explain all new or revised terminology, including:
  - The meaning and scope of "hazardous materials "program" requirements";
  - The distinction between materials "Approved by the FAA" vs. "Provided to the FAA";
  - The process for "training program/manual revision approval";
  - A clear definition of what constitutes a "revision" to training programs or manuals.
- Establish a standardized and streamlined process for FAA PHI oversight of hazardous materials training and manuals, including:
  - A uniform review approach by PHIs across all regions.
  - An equivalency-based process for third-party handler training, where carriers validate the handler's program and only substantive changes (not full programs) require FAA review;
  - A policy limiting FAA review to substantial changes to previously approved materials, avoiding delays for minor administrative updates.
- Provide an updated and transparent burden analysis that includes both total hours and dollar costs.

COSTHA and its member air carriers respectfully requests that these actions be completed prior to finalizing any modifications to OMB Control Number 2120–0705, to ensure transparency, regulatory consistency, and effective stakeholder engagement. We appreciate your consideration of our comments. If you have any questions, please do not hesitate to contact me.

Sincerely,



Drew Watts  
Regulatory Compliance Specialist  
COSTHA