



危险物品专家组 (DGP)

第二十五次会议

2015年10月19日至30日，蒙特利尔

议程项目2： 拟定对《危险物品安全航空运输技术细则》(Doc 9284号文件)的修订建议，
以便纳入2017年 – 2018年版

使用对环境有害的物质标记

(由T. Muller提交)

摘要

本文件建议对数量为5升或5升以下的液体或5千克或5千克以下的固体的包装件重新引入例外使用对环境有害物质的标记。

危险物品专家组的行动：请危险物品专家组按照本工作文件附录所示，审议拟议的修订。

1. INTRODUCTION

1.1 In the 2015-2016 Edition of the Technical Instructions Special Provision A197 was introduced which is equivalent to SP 375 of the Model Regulations.

A197 (375) These substances when transported in single or combination packagings containing a net quantity per single or inner packaging of 5 L or less for liquids or having a net mass per single or inner packaging of 5 kg or less for solids, are not subject to any other provisions of these Instructions provided the packagings meet the general provisions of 4;1.1.1, 4;1.1.3.1 and 4;1.1.5.

1.2 At the same time the following exception was deleted in the Model Regulations and as a consequence 5.2.4.9.1 was also amended in the 2015-2016 Edition of the ICAO Technical Instructions:

“Packages containing environmentally hazardous substances meeting the criteria of 2.2.9.1.10 shall be durably marked with the environmentally hazardous substance mark shown in 5.2.1.8.3 *with the exception of single packagings and combination packagings where such single packagings or inner packagings of such combination packagings have:*

— *a net quantity of 5 L or less for liquids*

— *a net mass of 5 kg or less for solids*”

1.3 Since the introduction of Special Provision A197, several discussions have clarified that the use of Special Provision A197 is not a mandatory requirement and that certain companies may choose to continue to transport UN 3077 — **Environmentally hazardous substance, solid, n.o.s.** and UN 3082 — **Environmentally hazardous substance, liquid, no.s.** in accordance with the regulations. However, because of the deletion of the exception for the use of the environmentally hazardous substance mark (EHS mark) for packagings of less than 5 L or 5 kg, the use of the EHS mark did become a mandatory requirement for all packagings transported by air even when transported under the provisions for limited quantities. Being no safety issue this is only putting an extra burden on the shippers and is creating confusing since ADR has maintained the exception in their regulations.

2. ACTION BY THE DGP

2.1 The DGP is invited to re-introduce the exception for the EHS mark in the Technical Instructions as it is believed it was never the intention to require the EHS mark to be used on single packagings or on combination packagings containing inner packagings of 5L or 5kg or less.

2.2 We do realize that the UN Committee of Experts should in principle be approached first with a request to re-introduce the exception again in the Model Regulations; however this would mean that the exception would only be re-introduced in the 2019-2020 Edition of the Technical Instructions. For that reason we propose to advise the UN Committee of Experts of the actions taken by the Dangerous Goods Panel and to request the committee to adopt the exception again.

附录

技术细则第5部分的拟议修订

第5部分

托运人的责任

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2.4 标记的规格和要求

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2.4.9 危害环境物质的特殊标记规定

2.4.9.1 除非本细则另有规定，包装件如果装有符合2.9.2.1 a) 标准的危害环境物质（联合国编号3077和3082），则必须耐久地标上危害环境物质的标记，且包装件必须带有第9类危险性标签，但单件包装和组合包装例外，这种单件包装或组合包装的内部包装含有：

- 净含量为5升或5升以下的液体；或
- 净质量为5千克或5千克以下的固体。

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