



危险物品专家组 (DGP)

第二十九次会议

2023 年 11 月 13 日至 17 日，蒙特利尔

- 议程项目 2: 管理航空特有的安全风险和查明异常情况 (编号: REC-A-DGS-2025)
- 2.2: 如有必要, 拟定对《危险物品安全航空运输技术细则》(Doc 9284 号文件) 的修订提案, 以便纳入 2025 年—2026 年版

托运人对文件的保留

(由 Eric Gillett 提交)

摘要

本文件概述了正确分类的重要性, 以及各国在监督和执法过程中核实这一过程有效性的困难。

危险物品专家组的行动: 请危险物品专家组审议本工作文件附录所载的对《技术细则》第 2 部分引言章的修订。

1. INTRODUCTION

1.1 At the DGP Working Group Meeting in 2023 (DGP-WG/23, 15 to 19 May 2023, Rio de Janeiro, Brazil), the importance of correct classification and concerns over the absence of requirements within the Technical Instructions for the shipper to retain evidence of how classification was reached were raised (see paragraph 4.2.2.3 of the DGP-WG/23 Report (DGP/29-WP/3)).

1.2 Whilst the shipper or freight forwarder might retain documentation such as commercial invoices and packing lists, often these do not identify the commodities in sufficient detail to know precisely what product has been shipped and enable evidence of classification to be requested. Consequently, States are unable to verify the correct classification of dangerous goods during occurrence investigations. This problem also relates to routine oversight, meaning latent failures by a shipper or forwarder can remain unidentified leading to a future dangerous goods accident or incident.

1.3 An amendment requiring the shipper to retain information or documentation demonstrating the basis of classification was proposed at DGP-WG/23 to remedy the issue. The report records that there was sympathy for the objective of the proposal, but some concerns over the specific proposal were made (see paragraph 4.2.2.3.2 of the DGP-WG/23 Report (DGP/29-WP/3)).

1.4 One concern related to the types of information identified within a proposed note that could be used to demonstrate the basis for classification, particularly a reference to safety data sheets. A note does not constitute a requirement. Furthermore, the Globally Harmonized System of Classification and Labelling of Chemicals includes standards for the structure and content of Safety Data Sheets including transport information consistent with the UN Model Regulations and ICAO Technical Instructions.

1.5 Another concern was that an explicit requirement to retain documentation would impose an undue burden on shippers. With the aim of gaining consensus, it is now proposed for the information to be made available to the appropriate national authority upon request.

1.6 There was a suggestion that the proposal would have multimodal implications. It is suggested that it is reasonable for this matter to be addressed directly within the Technical Instructions due to the explicit obligation on States within Annex 18 for the investigation of dangerous goods accidents, dangerous goods incidents and undeclared/misdeclared dangerous goods.

1.7 There was also a suggestion that guidance material might be a better approach towards achieving the intent. It is not clear how guidance can achieve the objective of ensuring that the information used by a shipper to assign a classification is available to the national competent authority if there is no requirement for the shipper to do so.

2. ACTION BY THE DGP

2.1 The DGP is invited to consider the amendment to the Introductory Chapter of Part 2 to the Technical Instructions provided in the appendix to this working paper.

附录

对《技术细则》第2部分的修订提案

第2部分 危险物品的分类

引言章

本章部分内容受国家差异条款 DE 5、NL 4 的影响；见表 A-1

1. 责任

1.1 当要求国家有关当局进行分类时，必须由国家有关当局分类，否则，可以由托运人进行分类。

1.2 如果危险物品的分类是由托运人进行的，则托运人用于指定分类的信息必须应要求提供给国家有关当局。

注：此类信息的例子包括物质的已知成分、车辆等物品的已知物理特性、分类测试结果和本《细则》第2部分中确定的其他适用要求，以及根据《全球化学品统一分类和标签制度》（GHS）发布的安全数据表。

~~1.2~~1.3 **发货人**托运人如根据试验数据，发现按第3部分第2章表3-1危险物品表的第1列中的名称列出的某种物质达到该表中没有列出的危险类别或项别的分类标准，可在主管国家当局的批准下，托运该物质，条件是：

- a) 使用最适当的可反映所有危险的类属条目或“未另作规定的”（n.o.s）条目；
- b) 使用同一联合国编号和名称，但酌情添加危险通知信息（单证、标签），反映其他的次要危险性，但主要危险类别保持不变，且通常情况下对具有此种组合危险的物质适用的任何其他运输条件（如限量、包装规定）与适用于所列物质的条件相同。

~~1.2~~1.3.1 必须给托运货物附上一份批准文件的副本。

注：主管国家当局在给予这种批准时，应相应通知联合国危险物品运输问题专家小组委员会，并提出一份针对危险物品表的相关修订提议。如果修订提议未被采纳，该主管国家当局应撤回其批准。

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