



危险物品专家组（DGP）

第三十次会议

2025 年 10 月 6 日至 10 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（REC-A-DGS-2027）

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 2027 年—2028 年版

议程项目 8： 与空中航行委员会其他专家组的协调

统一术语：批准或专门批准

（由 L. Cascardo 提交）

摘要

本工作文件是针对 2025 年危险物品专家组工作组会议上发起的关于统一使用“批准”与“专门批准”的讨论（见 DGP-WG/25 报告第 4.2.2.6 段）的后续。考虑到附件 6 中所述“专门批准”的意图，本工作文件质疑对于要求指定的邮政业务经营人在根据《技术细则》第 1 部分 2.3.4 条的规定收运邮寄设备中所含的锂电池之前，必须先从民航当局获得这一批准，使用该术语是否适当。本工作文件强调了潜在的不一致之处，并在附录 A 中提出了处理这些不一致的选项，供危险物品专家组审议。本工作文件还提议对 DGP-WG/25 会议上商定的对培训条款的修订做编辑性修改，将“批准”替换为“专门批准”，见本工作文件附录 B。

危险物品专家组的行动：请危险物品专家组：

- a) 同意本工作文件附录 A 中提出的对《技术细则》三个可选修订中的一项；
- b) 同意本工作文件附录 B 中提出的对 DGP-WG/25 会议上商定的对培训条款的修订的编辑性修改。

* 仅提供了摘要和附录的翻译。

1. INTRODUCTION

1.1 This working paper is in follow up to the discussion initiated at the 2025 DGP Working Group Meeting with respect to the consistent use of “approval” versus “specific approval” (see paragraph 4.2.2.6 of the DGP-WG/25 Report). It is part of an ongoing effort to harmonize the use of terminology raised in other working papers at this meeting and expected to continue at future meetings. Taking into account the intent of a “specific approval” described in Annex 6, it questions whether the terminology is appropriate with respect to requiring the designated postal operator to receive one from the civil aviation authority before it can introduce the acceptance of lithium batteries contained in equipment in the mail, as required by Part 1;2.3.4 of the Technical Instructions. It highlights potential inconsistencies and presents options for addressing them in Appendix A for the DGP’s consideration. It also proposes an editorial revision to an amendment to the training provisions replacing “approval” with “specific approval” agreed at DGP-WG/25, presented in Appendix B to this working paper.

1.2 Annex 6 — *Operation of Aircraft* uses “specific approval” as the official terminology when referring to an operator's authorization to transport dangerous goods as cargo. According to Annex 6, Part I, Attachment B:

2. REQUIRED TECHNICAL SAFETY EVALUATIONS

2.1 Specific approval, approval and acceptance actions

2.1.1 The certification and continued surveillance of an air operator includes actions taken by a State on matters submitted for its review. The actions can be categorized as specific approvals, approvals or acceptances depending on the nature of the response by the State to the matter submitted for its review.

2.1.2 A specific approval is an approval which is documented in the Operations Specifications for Commercial Air Transport.

2.1.3 An approval is an active response by the State to a matter submitted for its review. An approval constitutes a finding or determination of compliance with the applicable standards. An approval will be evidenced by the signature of the approving official, the issuance of a document or certificate, or some other formal action taken by the State.

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3. AUTHORIZATIONS

An authorization entitles an operator, owner or pilot-in-command to undertake the authorized operations. Authorizations can take the form of specific approvals, approvals or acceptances.

3.1 Specific approval actions

3.1.1 The term “specific approval” indicates a formal action on the part of the State of the Operator which results in an addition to the operations specification.

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1.3 The use of the term “specific approval” in Part 1;2.3.4 of the Technical Instructions may cause confusion, since designated postal operators (DPOs) do not receive operations specifications for commercial air transport as described in Annex 6, Part I, Attachment B, paragraphs 2.1.2 and 3.1.1. Instead, the approval for DPOs is usually provided through a different type of document issued by the competent authority, which is not formally considered an operations specification.

1.4 During the discussion at DGP-WG/25 (see paragraph 4.2.2.6 of the DGP-WG/25 Report), a few members noted that further discussion would be useful on the terminology applied to the DPO. It was suggested that the use of “specific approval” may not be the most appropriate expression in this context, and that an alternative term might better describe the type of authorization granted to DPOs for the acceptance of lithium batteries contained in equipment.

1.5 During the discussion of the same paper, it was noted that “*several other references to ‘approval’ in the Technical Instructions should potentially be replaced with ‘specific approval’*”, as presented in the meeting report. However, a thorough search of all occurrences of the terms “approval” and “approved” found no instances that would require such changes. Further clarification from those who made the comments would be needed to continue this work, if necessary.

2. Proposal

2.1 This paper proposes that the DGP consider which terminology should be used with respect to the DPO to ensure the most clarity and alignment with Annex 6 definitions, while also ensuring consistency within the Technical Instructions.

2.2 Three possible options could be considered:

- a) **Option 1: Maintain “specific approval” while adding an explanatory note.** The terminology would remain unchanged. However, a clarifying note could be added to explain that, in this particular context, the term differs from the one used in Annex 6, Part I. Instead of being reflected in *operations specifications*, the approval for DPOs would be issued through a different document provided by the authority;
- b) **Option 2: Replace “specific approval” with “approval”.** The wording would be changed to “approval”, which would align more closely with the Annex 6 definition. However, this could create some confusion, as “approval” is already used in other contexts within the Technical Instructions.
- c) **Option 3: Replace “specific approval” with “authorization”.** The wording would be changed to “authorization”. According to Annex 6, Part I, *authorization* is a broader term that encompasses specific approvals, approvals, and acceptances. This option would provide flexibility and avoid the narrow interpretation associated with “*specific approval*”.

3. editorial revision to an AMENDMENT RELATED TO APPROVAL OF TRAINING PROGRAMMES AGREED IN PRICIPLE AT DGP-WG/25

3.1 DGP-WG/25 agreed to an amendment replacing “approval” with “specific approval” in relation to the establishment of training programmes by the operator, pending the panel’s agreement of precise wording to

ensure alignment with Annex 6 terminology (e.g. ‘have a specific approval’, ‘hold a specific approval’, or ‘have been issued a specific approval’)” (see paragraph 4.2.2.6 of the DGP-WG/25 Report). Upon further review, the expression “*have a specific approval*” appears in Annex 6 twice and only in the context of dangerous goods. In all other contexts, the more commonly used expression is “*issue a specific approval*”, which may suggest that the expressions used in the context of dangerous goods should be reconsidered. Accordingly, an editorial revision to the amendment approved at DGP-WG/25 is presented in Appendix B.

4. ACTION BY THE DGP

4.1 The DGP is invited to:

- a) agree to one of the three optional amendments to the Technical Instructions proposed in Appendix A to this working paper; and
- b) agree to the editorial revision to the amendment to the training provisions agreed at DGP-WG/25 proposed in Appendix B to this working paper (editorial revision is highlighted in yellow).

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附录 A

旨在澄清有关准许指定的邮政业务经营人收运邮寄设备中 所含锂电池所用术语的拟议修订选项

第 1 部分

概论

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选项1:保留“专门批准”同时加一个解释性注。

2.3 危险物品的邮寄运输

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2.3.2 以下危险物品可作为邮件进行航空运输，但须受所涉国家有关当局的规定和本细则规定的限制：

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- d) 符合包装说明967第II节规定的装在设备中的锂离子电池（UN 3481）。任一单个包装件内不得邮寄超过四个电池芯或两个电池；和
- e) 符合包装说明970第II节规定的装在设备中的锂金属电池（UN 3091）。任一单个包装件内不得邮寄超过四个电池芯或两个电池。

2.3.3 经指定的邮政业务经营人（DPOs）关于控制航空邮寄危险物品的程序必须得到收运邮件所在国的民航当局的审查和批准。

2.3.4 在经指定的邮政业务经营人能够开始收运2.3.2 d) 和e)列出的锂电池之前，该指定的邮政业务经营人必须得到民航当局的特定批准。

注1：经指定的邮政业务经营人无需民航当局的专门批准，即可收运2.3.2 a), b) 和c) 列出的危险物品。

注2：本细则补篇（S-1;3）载有为国家主管当局和民航当局提供的指导原则。

注3：就本章而言，“专门批准”不同于附件 6 第 I 部分附篇 B 中的定义，因为它是指民航当局在评估邮政业务经营人的程序后颁发的准许，以允许其收运 2.3.2 d) 和 e) 中所列的锂电池。

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选项2：用“批准”代替“专门批准”

2.3 危险物品的邮寄运输

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2.3.2 以下危险物品可作为邮件进行航空运输，但须受所涉国家有关当局的规定和本细则规定的限制：

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- d) 符合包装说明967第II节规定的装在设备中的锂离子电池（UN 3481）。任一单个包装件内不得邮寄超过四个电池芯或两个电池；和
- e) 符合包装说明970第II节规定的装在设备中的锂金属电池（UN 3091）。任一单个包装件内不得邮寄超过四个电池芯或两个电池。

2.3.3 经指定的邮政业务经营人（DPOs）关于控制航空邮寄危险物品的程序必须得到收运邮件所在国的民航当局的审查和批准。

2.3.4 在经指定的邮政业务经营人能够开始收运2.3.2 d) 和e)列出的锂电池之前，该指定的邮政业务经营人必须得到民航当局的**特定**批准。

注1：经指定的邮政业务经营人无需民航当局的专门批准，即可收运2.3.2 a), b) 和c) 列出的危险物品。

注2：本细则补篇（S-1;3）载有为国家主管当局和民航当局提供的指导原则。

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选项3：用“准许”代替“专门批准”

2.3 危险物品的邮寄运输

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2.3.2 以下危险物品可作为邮件进行航空运输，但须受所涉国家有关当局的规定和本细则规定的限制：

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- d) 符合包装说明967第II节规定的装在设备中的锂离子电池（UN 3481）。任一单个包装件内不得邮寄超过四个电池芯或两个电池；和
- e) 符合包装说明970第II节规定的装在设备中的锂金属电池（UN 3091）。任一单个包装件内不得邮寄超过四个电池芯或两个电池。

2.3.3 经指定的邮政业务经营人（DPOs）关于控制航空邮寄危险物品的程序必须得到收运邮件所在国的民航当局的审查和批准。

2.3.4 在经指定的邮政业务经营人能够开始收运2.3.2 d) 和e)列出的锂电池之前，该指定的邮政业务经营人必须得到民航当局的**特定批准**准许。

注1：经指定的邮政业务经营人无需民航当局的专门批准，即可收运2.3.2 a), b) 和c) 列出的危险物品。

注2：本细则补篇（S-1;3）载有为国家主管当局和民航当局提供的指导原则。

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附录 B

对 DGP-WG/25 会议上商定的 对《技术细则》拟议修订的编辑性修改

第 1 部分

概论

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见DGP-WG/25 报告第4.2.2.6段:

第4章

危险物品培训

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4.1 制定危险物品培训方案

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请DGP/30考虑将DGP-WG/25上商定的方括号内的案文加黄色阴影强调:

4.1.2 所有运营人都必须制定一项危险物品培训方案，不论它们是否被批准[已被颁发]专门批准运输危险物品货物。

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