

A laboratory setting with a microscope in the foreground, a beaker containing a blue liquid on a wire rack, and a multi-well plate in the lower left. The entire image has a blue color overlay.

CIRS

危險化學品問答集

FAQS OF HAZARDOUS CHEMICALS

危险化学品问答集

FAQs of hazardous chemicals

根据《危险化学品安全管理条例》的规定，海关负责对进出口危险化学品及其包装实施检验。

“危险化学品”是什么？大家常说的“危包证”又是什么？哪些货物需要办理？应该如何申请办理？……如果你有这些疑问，那就来看看小编为大家整理的问答集吧！

In accordance with the *Regulation on the Safety Management of Hazardous Chemicals*, the Customs is responsible for the inspection of imported and exported hazardous chemicals and their packages. Many people may have questions on such as what the definition of hazardous chemicals is, what a packing certificate of dangerous goods refers to, and how to apply for. CIRS Group has summarized questions that are frequently asked, and please read the following article for answers.

Q: 危险化学品和危险货物分别指什么？

A: 危险化学品是指具有毒害、腐蚀、爆炸、燃烧、助燃等性质，对人体、设施、环境具有危害的剧毒化学品和其他化学品。

危险货物是指具有爆炸、易燃、毒害、感染、腐蚀、放射性等危险特性，在运输、储存、生产、经营、使用和处置中，容易造成人身伤亡、财产损毁或环境污染而需要特别防护的物质和物品。

Q: What are the definitions of hazardous chemicals and dangerous goods?

A: “Hazardous chemicals” refers to the highly toxic chemicals and other chemicals which are toxic, corrosive, explosive, flammable or combustion-supporting and causes harm to people, facilities or the environment.

“Dangerous goods” means substances and articles that have explosive, flammable, toxic, infectious, corrosive, radioactive, and other dangerous properties; and are susceptible to causing personal injury, property damage or environmental pollution during the transportation, storage, manufacture, operation, use and disposal.

Q: 危险化学品与危险货物的区别是什么？

A: 危险化学品仅包含化学物质，危险货物包含物质和物品，两者均对包装有特殊要求。部分危险货物不属于危险化学品，例如锂电池、蓄电池、火柴、汽车安全气囊等。

危险化学品分类原则中，部分危害未被危险货物分类标准采纳，因此部分危险化学品不属于危险货物，例如硼酸。

Q: What are the differences between hazardous chemicals and dangerous goods?

A: Hazardous chemicals only refer to chemical substances while dangerous goods may be substances and articles. Both of them have special packaging requirements. Some dangerous goods are not classified as hazardous chemicals, such as lithium batteries, accumulators, matches, supplemental restraints, etc.

And some hazardous chemicals are not classified as dangerous goods due to that several hazard classifications of hazardous chemicals are not adopted in the classifications of dangerous goods, for example, boric acid.

Q: 大家常说的“危包证”是什么？

A: “危包证”是一种俗称，准确的讲是指包装性能检验合格后出具的《出境货物运输包装性能检验结果单》和包装使用鉴定合格后出具的《出境危险货物运输包装使用鉴定结果单》。

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Q: What is a packing certificate of dangerous goods?

A: The packing certificate of dangerous goods is commonly known as the “Inspection Certificate for Packing Functions of Outbound Goods” and the “Identification Certificate for Packing Use of Outbound Dangerous Goods” which issued after the qualification of packing performance and packing use.

Q: “危包证” 怎么办理？

A: 根据《中华人民共和国进出口商品检验法》及其实施条例规定，出口危险货物包装容器的生产企业应当向产地海关申请危险货物包装容器性能鉴定；出口危险货物的生产企业应当向产地海关申请危险货物包装容器使用鉴定。

温馨提示：

出口危险货物需要办“危包证”；出口的危险化学品属于危险货物也需要办理“危包证”。

Q: How to obtain the packing certificate for dangerous goods?

A: In accordance with the *Law on Import and Export Commodity Inspection* and the *Implementation Regulation on the Import and Export Commodity Inspection*, factories manufacturing packaging containers of outbound dangerous goods shall apply for the inspection certificate for packing functions to the Customs under its jurisdiction. Factories manufacturing dangerous goods shall apply for the identification certificate for packing use of outbound dangerous goods to the Customs under its jurisdiction.

Tips: Outbound dangerous goods shall obtain the packing certificate for dangerous goods; outbound hazardous chemicals shall also obtain the packing certificate if they are identified as dangerous goods.

Q: 需申报检验的出口危险化学品范围及申报要点有哪些？

A: 申报范围：我国《危险化学品目录（2015 版）》（危险化学品涉及的 HS 编码和相应的检验检疫名称也在通知的附件中提供）列明的危险化学品。

注意：无论是否列入《出入境检验检疫机构实施检验检疫的进出境商品目录》，《危险化学品目录》列明的危险化学品都应如实向海关申报，并积极配合海关对进出口危险化学品及其包装实施检验。

申报要点：出口前应在单一窗口“出境检验检疫申请”模块中申请电子底账，出口报关时应在出口报关单整合申报模块填写电子底账号。

温馨提示：海关总署每年 12 月 31 号前都会更新《出入境检验检疫机构实施检验检疫的进出境商品目录》。

Q: What kinds of outbound hazardous chemicals are subject to inspection? What are the requirements of the inspection?

A: Outbound hazardous chemicals that included in the *Catalog of Hazardous Chemicals 2015* shall be required to make inspections. (HS code and the corresponding name in inspection and quarantine of hazardous chemicals can refer to the Appendix).

It is required to apply for an electronic ledger through the single window of “Entry-Exit Inspection and Quarantine Application” prior to export. The electronic ledger account shall be filled in the column of integrated export declaration.

Attention: The hazardous chemicals included in the *Catalog of Hazardous Chemicals 2015* shall be declared to the Customs truthfully regardless of whether they are listed in the *Catalogue of Entry-Exit Commodities Subject to Inspection and Quarantine by Entry-Exit Inspection and Quarantine Institutions* or not. Active cooperation with Customs shall be made on the inspection of the imported and exported hazardous chemicals and their packages.

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Tips: The General Administration of Customs updates the *Catalogue of Entry-Exit Commodities Subject to Inspection and Quarantine by Entry-Exit Inspection and Quarantine Institutions* every year before December 31.

Q: 出口危险化学品的发货人或者其代理人需提供的申报资料有哪些?

- A:** 1. 《出口危险化学品生产企业符合性声明》;
2. 《出境货物运输包装性能检验结果单》(散装产品及国际规章豁免使用危险货物包装的除外);
3. 危险特性分类鉴别报告;
4. 危险公示标签(散装产品除外)、安全数据单样本,如是外文样本,应提供对应的中文翻译件;
5. 对需要添加抑制剂或稳定剂的产品,应提供实际添加抑制剂或稳定剂的名称、数量等添加抑制剂情况说明。
温馨提示: 上述 1-4 项材料,涉及多个申报批次、需多次使用的单证,允许企业仅首次申报时提供,后续重复使用,海关需要验核原件的,按要求提供。第 2 项《出境货物运输包装性能检验结果单》不管是否首次申报,都需提供并由海关进行核销。

Q: What kind of materials shall be submitted by the consignor of exported hazardous chemicals or the agent thereof when making a declaration to the Customs?

A: The following materials are required to provide:

1. Compliance statement for enterprises exporting hazardous chemicals;
2. Inspection Certificate for Packing Functions of Outbound Goods (except for products in bulk and products that are exempted from packing for dangerous goods under international regulations);
3. Identification report on hazard classifications;
4. Hazardous label (except for products in bulk), a sample of SDS; a Chinese translation version shall be provided if the label or SDS is delivered in a foreign language; and
5. Names, quantities and other information of the actual added inhibitors or stabilizers, if the products need to add any inhibitors or stabilizers.

Tips: These above-mentioned materials involving multiple batches of declarations may be allowed to be provided only for the first declaration. However, when the Customs needs to verify the original documents, enterprises shall provide as required. In addition, the Inspection Certificate for Packing Functions of Outbound Goods shall be provided to the Customs every time regardless of its first declaration or not.

Q: 进出口危险化学品及其包装检验监管要求是什么?

A: 1. 进出口列入《危险化学品目录》的危险化学品应符合以下要求:

- (1) 我国国家技术规范的强制性要求(进口产品适用);
- (2) 有关国际公约、国际规则、条约、协议、议定书、备忘录等;
- (3) 输入国家或者地区技术法规、标准(出口产品适用);
- (4) 海关总署以及原质检总局指定的技术规范、标准。

2. 进出口危险化学品检验的内容包括:

- (1) 产品的主要成分/组分信息、物理及化学特性、危险类别等是否符合相关规定。
 - (2) 产品包装上是否有危险公示标签(进口产品应有中文危险公示标签),是否随附安全数据单(进口产品应附中文安全数据单);危险公示标签、安全数据单的内容是否符合相关规定。
3. 对出口列入国际危规(联合国《关于危险货物运输的建议书》规章范本,英文简称 TDG)《危险货物一览表》的危险货物,按照海运、空运、公路运输及铁路运输出口危险货物包装检验管理规定、标准实施包装性能检验、使用鉴定。
4. 用作食品、食品添加剂的出口危险化学品,应符合食品安全相关规定。

Q: What are the verification and inspection requirements of the imported and exported hazardous chemicals and their packaging?

A: Relevant requirements are as following:

1. The imported and exported of hazardous chemicals that have been listed in the *Catalog of Hazardous Chemicals* shall meet the following requirements:
 - a. Mandatory requirements of the national technical specifications in China (applicable to imported products);
 - b. Relevant international conventions, rules, treaties, agreements, protocols and memorandums, etc.;
 - c. Technical regulations and standards in the target countries or regions (applicable to exported products); and
 - d. Specifications and standards formulated by the General Administration of Customs and the original General Administration of Quality Supervision, Inspection and Quarantine.
2. The following items shall be inspected and verified for imported and exported hazardous chemicals:
 - a. Whether the main components, physical and chemical properties, and hazard categories are qualified;
 - b. Whether there have hazardous labels and SDSs on the outer packaging (labels and SDSs in Chinese are required for imported products); and whether the labels and SDSs are qualified.
3. Dangerous goods that are included in the List of Dangerous Goods under the *Recommendations on the Transport of Dangerous Goods* (TDG) shall make the inspection and identification for their packaging during export in accordance with relevant laws and regulations on the packaging inspection of dangerous goods by marine, air, road and railway.
4. Outbound hazardous chemicals used to produce food or food additives shall obey relevant regulations on food safety.

Q: 如 HS 编码涉及危险化学品的商品, 但不属于《危险化学品目录 (2015 版)》且无检验检疫监管条件商品, 也必须申请电子底账吗?

A: 不需要申请电子底账。由于存在危险化学品和非危险化学品共用一个 HS 编码的情况, 如果企业根据相关鉴别报告确认货物不属于危险化学品且该编码没有检验检疫监管条件, 则可以不申请电子底账。在“出口报关整合申报”时, 可在“危险货物信息”编辑界面勾选“非危险化学品”。

Q: Is it necessary to apply an electronic ledger for products supposing their HS codes are identified as hazardous chemicals but not listed in the *Catalog of Hazardous Chemicals 2015* without inspection or quarantine requirements?

A: No, it isn't. In some cases, hazardous chemicals and non-hazardous chemicals share one HS code. If enterprises identify a product as a non-hazardous chemical based on the identification report and there is no requirement for inspection and quarantine under the corresponding HS code, then the product is not required to apply for an electronic ledger. Enterprises may select “non-hazardous chemicals” in the interface of “information of dangerous goods” when making an integrated customs declaration.

Q: 企业拟进口货物不在《危险化学品目录》(2015 年版) 中的“危险化学品目录”范围内, 但符合该《目录》(2015 年版) 中“说明”的要求, 是否需要按照海关总署 2020 年 129 号公告要求实施检验?

A: 海关对列入国家《危险化学品目录》(最新版) 的进出口危险化学品实施检验。

Q: Supposing a imported good is not listed in the *Catalog of Hazardous Chemicals 2015* but meets the requirements in the “Statements” of the Catalog, does the good require inspections in accordance with

Announcement (No.129/2020) issued by the General Administration of Customs?

A: The Customs conducts inspections for imported and exported hazardous chemicals listed in the latest version of the *Catalog of Hazardous Chemical*.

Q: 出口含有锂电池的设备，锂电池是否要办“危包证”？

A: 根据联合国 TDG 的规定，需要根据锂电池的容量来看，如果容量大的则需要办“危包证”，容量小的则不用办。

按照《联合国关于危险货物运输的建议书》的规定，需使用危险货物包装的锂电池：锂金属电池或锂合金电池，锂含量大于 1 克，对于锂金属或锂合金电池组，合计锂含量大于 2 克；锂离子电池，瓦特一小时的额定值超过 20W•h，对于锂离子电池组，瓦特一小时的额定值超过 100W•h。

Q: When exporting equipment containing lithium batteries, is it necessary to apply for a packing certificate of dangerous goods for the lithium batteries?

A: In accordance with the TDG, the need for packing certificate of dangerous goods depends on the capacity of the lithium batteries. Those meet the following conditions shall be subject to the dangerous goods packaging: lithium metal batteries or lithium alloy batteries with lithium content more than 1g; lithium metal and lithium alloy battery packs with a total lithium content more than 2g; lithium-ion batteries with power exceeding 20 W h; lithium-ion battery packs with power exceeding 100 W h.

相关依据：

1. 《中华人民共和国进出口商品检验法》第十七条；
2. 《中华人民共和国进出口商品检验法实施条例》第二十九条、第五十一条；
3. 《危险化学品安全管理条例》(国务院第 591 号令)第六条第三款；
4. 《烟花爆竹安全管理条例》第四条；
5. 《关于进出口危险化学品及其包装检验监管有关问题的公告》(原质检总局 2012 年第 30 号)。

References:

1. Article 17 of the *Law of the People's Republic of China on Import and Export Commodity Inspection*;
2. Article 29, Article 51 of the *Implementation Regulation on the Import and Export Commodity Inspection*;
3. Paragraph 3, Article 6 of the *Regulation on the Safety Management of Hazardous Chemicals* (Order No.591 of the State Council);
4. Article 4 of the *Regulation on the Safety Administration of Fireworks and Firecrackers*;
5. The *Announcement on Issues Concerning the Inspection and Supervision of Imported and Exported Hazardous Chemicals and the Packaging Thereof* (Order No.30/2021 issued by the former AQSIQ).