

## **Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals**

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### **Sub-Committee of Experts on the Transport of Dangerous Goods**

#### **Forty-ninth session**

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Item 3 of the provisional agenda

**Listing, classification and packing**

## **Comments on 2016/48: Proper Shipping Name in case of several distinct entries listed under a single UN Number**

### **Transmitted by the expert from Spain**

#### **Introduction**

1. When analysing document 2016/48 from Austria, an additional point has shown up, that may need further clarification.
2. The first paragraph of 3.1.2.2 indicates that:  
“When conjunctions such as “and” or “or” are in lower case or when segments of the name are punctuated by commas, the entire name of the entry need not necessarily be shown in the transport document or package marks. This is the case particularly when a combination of several distinct entries are listed under a single UN Number. Examples illustrating the selection of the proper shipping name for such entries are:”
3. The second sentence of this paragraph particularises the shorting of the Proper Shipping Name for the case when several entries are listed under a single UN Number. Additionally, by using the wording “This is the case particularly” it gives the impression that this is not the only case when a Proper Shipping Name can be shortened.
4. Listing several entries under a single Proper Shipping Name seems to be the only possibility to introduce “and” or “or” in lower case. Nevertheless, there are plenty entries where segments of the name are punctuated by commas:  
UN 1953 COMPRESSED GAS, TOXIC, FLAMMABLE, N.O.S  
UN 2018 CHLOROANILINES, SOLID  
UN 2216 FISH MEAL (FISH SCRAP), STABILIZED
5. In none of these examples it is intended that the Proper Shipping Name may be shortened where the segments of the name are punctuated by commas. Additionally, the use of commas is not similar in the different translations of UN Numbers (UN 2018 for example has no commas in Spanish or French). In fact, the only case where it seems reasonable to shorten the Proper Shipping Name, when the segments of the name are punctuated by commas, is when a combination of several distinct entries are listed under a single UN Number.

6. Therefore, the expert from Spain would suggest reformulating the initial paragraph under 3.1.2.2 simplifying and clarifying its text:

3.1.2.2

“When a combination of several distinct entries are listed under a single UN number, and these are separated by “and” or ”or” in lower case or are punctuated by commas, the entire name of the entry need not necessarily be shown in the transport document or package marks. Examples illustrating the selection of the proper shipping name for such entries are:”

7. The mandatory obligation to show only the most appropriate shipping name, as suggested in 2016/48 by the expert from Austria, can be accommodated into this text in the following manner:

3.1.2.2.

“When a combination of several distinct entries are listed under a single UN number, and these are separated by “and” or ”or” in lower case or are punctuated by commas, only the most appropriate one has to be shown in the transport document or package marks. Examples illustrating the selection of the proper shipping name for such entries are:”

## Proposal

8. The expert from Spain would suggest reformulating the introductory paragraph in 3.1.2.2. The wording of this paragraph should make clear that it is not intended that the Proper Shipping Name may be shortened when commas are used. Therefore, it is suggested to modify the introductory paragraph as follows (inserted text underlined, deleted text is ~~struck through~~) (Option A):

“When ~~conjunctions such as~~ a combination of several distinct entries are listed under a single UN number, and these are separated by “and” or ”or” ~~are~~ in lower case or ~~when segments of the name~~ are punctuated by commas, the entire name of the entry need not necessarily be shown in the transport document or package marks. ~~This is the case particularly when a combination of several distinct entries are listed under a single UN Number.~~ Examples illustrating the selection of the proper shipping name for such entries are:”

Alternatively, if the proposal by Austria is followed, it is proposed to introduce the following text (Option B):

“When ~~conjunctions such as~~ a combination of several distinct entries are listed under a single UN number, and these are separated by “and” or ”or” ~~are~~ in lower case or ~~when segments of the name~~ are punctuated by commas, only the most appropriate one has to be shown in the transport document or package marks. ~~This is the case particularly when a combination of several distinct entries are listed under a single UN Number.~~ Examples illustrating the selection of the proper shipping name for such entries are:”

The consolidated view of option A is shown in paragraph 6, the consolidated view of option B in paragraph 7.