

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

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

22 November 2011

Fortieth session

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Item 4 (c) of the provisional agenda

**Miscellaneous proposals of amendments to the
Model Regulations on the Transport of Dangerous Goods: marking and labelling**

Interpretation and clarification of 5.2.1.1 and 5.4.1.4 in multimodal transport

Transmitted by the expert from Spain

1. The government of Spain has noticed differences among the regulations as regards of the marking and documentation of the dangerous goods when it comes to its translation into Spanish.
2. In 5.2.1.1, the Model Regulations state that the proper shipping name and the UN number shall be displayed on each package preceded by the letters “UN”. In Spain, translation made by the Ministry of Development for ADR and RID also state that the marks shall be preceded by the letters “UN”, and so it says the IMDG Code in its Spanish version. The difference appears in the ICAO Technical Instructions. When translated into Spanish, 5.2.1.1 of the Technical Instructions says that it shall be preceded of the letters “ONU” or “ID” as applicable. There is a State Variation that obliges the packages to have the marks translated into Spanish, so this marking is a requirement. It is also a requirement for ADR and RID that markings and documentation is translated since our internal regulations state it that way.
3. Regarding documentation, 5.4.1.4.1 of the Model Regulations and the IMDG Code state that the description of the goods starts with the UN number preceded by the letters “UN”. This is the way it has been translated into Spanish in paragraphs 5.4.1.1.1 of ADR and RID in Spain. Once again, in the Technical Instructions it says that it shall start by the letters “ONU” or “ID”.
4. The IMSBC Code, mandatory since January 1st 2011, states in 4.2.2.4 that the UN number shall be preceded in the documentation by the letters “ONU”, so it agrees with the Technical Instructions but not with the IMDG Code, which represents a problem in maritime transport.
5. “ONU” would be the Spanish translation of “UN”. Checking the French version of the Model Regulations, we’ve seen that the letters required are “UN” and not “NU”, which we understand would be the translation in French, so we understand this has not been translated into French, so translation is not necessary and “UN” should be required always regardless of the language of the proper shipping name that goes after it.

6. We seek clarification as regards of the intention of 5.2.1.1. and 5.4.1.4. of the Model Regulations. We would like to know whether the intention is that the letters “UN” shall precede the proper shipping name regardless of the language we are using, as we understand it, or if “ONU” should be used instead of “UN” when the proper shipping name is in Spanish.

7. With the result of the discussion, Spain shall proceed as appropriate, whether asking for an amendment to the Technical Instructions in its Spanish version and to the IMSBC Code as well or to internally amend our versions of ADR, RID and then request an amendment to the Spanish translation of the IMDG Code.

8. In the meanwhile, we have detected some problems in Valencia and Barcelona’s airports regarding the marking of the packages, confusion with the regulations is delaying shipments, so the fact that the Sub-Committee would give an interpretation as regards of this issue and that it would be on the report would help us solve them temporarily until a final solution that harmonizes all transports is achieved.
