



**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****Fiftieth session**

Geneva, 28 November-6 December 2016

Item 7 (i) of the provisional agenda

**Issues relating to the Globally Harmonized System
of Classification and Labelling of Chemicals:
miscellaneous****Differences as related to UN 1386 in the IMSBC and IMDG
Codes and the Model Regulations****Submitted by the expert from Spain¹****Introduction**

1. At the forty-ninth session of the Sub-Committee the Secretariat analysed in informal document INF.42 differences in the proper shipping names of the UN numbers between the IMDG Code and the Model Regulations, mainly as regards the Spanish version. One specific point on which the Secretariat drew the attention is UN 1386 (page 37 of INF.42), where the proper shipping name for all language versions in the IMDG Code contains additional information in lower case which is different from the text in lower-case in the Model Regulations.

Model Regulations:

“SEED CAKE with more than 1.5% oil and not more than 11% moisture”

“TOURTEAUX contenant plus de 1,5 % (masse) d'huile et ayant 11 % (masse) d'humidité au maximum”

“TORTA OLEAGINOSA con más del 1,5% de aceite y un máximo del 11% de humedad”

¹ In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

IMDG Code:

“SEED CAKE, containing vegetable oil (a) mechanically expelled seeds, containing more than 10% oil or more than 20% oil and moisture combined”

“TOURTEAUX contenant de l’huile végétale a) graines triturées par procédé mécanique contenant plus de 10 % d’huile ou plus de 20 % d’huile et d’humidité combinées”

TORTA DE SEMILLAS, con una proporción de aceite vegetal a) residuos de semillas prensadas por medios mecánicos y que contienen más del 10 % de aceite o más del 20 % de aceite y humedad combinados”

2. The Secretariat recommended to “clarify whether the texts should be the same in the Model Regulations and the IMDG Code, or whether the differences are justified and the text in lower-case should remain unchanged.”

Analysis

3. Spain was already aware of these differences for UN 1386, and presented document CCC 3/6/2 to the third session of the IMO Sub-Committee on Carriage of Cargoes and Containers (09/2016). In this document (reproduced as informal document INF.4) it is shown that the different text in lowercase can lead to classification under different UN Numbers in IMDG Code and Model Regulations, and proposes to modify the lowercase text in the IMDG Code to accommodate to the Model Regulations.

4. Seed cakes have been discussed actively at IMO meetings concerning the IMDG Code and specially the IMSBC Code over the last years, and also other changes are proposed for seed cakes (see CCC 3/5/11), which do not directly affect the definition of UN 1386.

Proposal

5. The expert from Spain would seek the support of the Sub-Committee in solving the differences existing in the proper shipping name for this UN number, which can lead to different classifications.
6. After the CCC meeting, Spain intends to submit an informal document informing on the decisions adopted at the CCC, and proposing a way forward.
