
Economic Commission for Europe

Informal UN/LOCODE Consultation

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Code for Northern Ireland in UN/LOCODE

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Summary

This document is an informal note and does not represent the views of the UNECE secretariat or its member States.

This document will be discussed at the Informal UN/LOCODE Consultation.

I. Introduction

1. The secretariat has received several queries about Northern Ireland after Brexit from stakeholders in the European Union (EU) and the United Kingdom (UK) of Great Britain and Northern Ireland. The UN/LOCODE Focal Point for the European Maritime Safety Agency (EMSA) informed the secretariat that the European Commission has issued guidance on the use of “GB” and “XI” codes in the customs declarations and asked to clarify the position of the UN/LOCODE secretariat on whether the code “XI” should be used for Northern Ireland in UN/LOCODE.

2. This document is an information note, prepared by the secretary of the UN/LOCODE Advisory Group and does not represent the views of the UNECE secretariat or its member States.

II. ISO 3166-1 country codes for the United Kingdom

3. UN/LOCODE is a five-character coding system where the first two characters are a country or territory code based on ISO 3166-1. Currently, “GB” is used for the UK.

4. ISO 3166 does not currently contain country codes for the constituent parts of the UK (Scotland, England, Wales, and Northern Ireland) in either Part 1 (country or territory codes) or Part 2 (subdivisions). The subdivisions listed in ISO 3166-2 are the local government areas across the UK.

5. Following Brexit, Northern Ireland is no longer part of the EU and has a land border with the EU (Ireland). However, it is understood that both the UK Government and the EU aim to avoid a “hard border” between Northern Ireland and Ireland. This has given rise to situations that appear to require a unique code to distinguish Northern Ireland from the rest of the UK for trade and taxation purposes.

6. For example, a lorry load of Northern Ireland meat products could board a ferry at Dublin port (Ireland) and disembark at a French port with no new paperwork or checks. However, if a similar load were travelling from Scotland to France it would need to be accompanied by new export health certificates and the authorities would need advance notice of its arrival. It would have to go to a border control post where the load may be physically examined.

7. ISO discussed the issue of the ISO code for Northern Ireland at the last ISO 3166/MA Plenary on 17 May 2021. A background document was prepared by the ISO 3166 Maintenance Agency (ISO/TC 46/MA N 1054) to briefly outline the situation regarding Northern Ireland following the UK’s withdrawal from the EU and to consider code requirements for the UK within ISO 3166. According to this document, the UK and EU have agreed between themselves to use the codes XI (for Northern Ireland) and XU (for UK minus Northern Ireland), which are not allocated or in any way administered by ISO.

8. The European Commission has issued guidance on the use of GB and XI codes in the customs declarations:

GB	United Kingdom	Great Britain, Northern Ireland, Channel Islands and Isle of Man
XI	United Kingdom (Northern Ireland)	Code to be used if United Kingdom (in respect of Northern Ireland) needs to be distinguished according to the conditions laid down in the relevant Union provisions.
XU	United Kingdom (excluding Northern Ireland)	Code to be used if United Kingdom (excluding Northern Ireland) needs to be distinguished according to the conditions laid down in the relevant Union provisions.

(Note: The code XU is not used in the context of customs declarations, notifications, and proof of the customs status of Union goods¹.)

¹ Union goods comprise products manufactured in the EU and in free circulation within the Union. Union goods can be transferred within the EU without any customs formalities.

9. ISO 3166 does not allocate codes beginning with “X”. This is intentional so that codes “XA” to “XZ” are available to be used as “user-assigned codes” in cases where a certain party requires a code for something that is not coded in ISO 3166. Another example of a user-assigned code that is quite widely used in “XK” for Kosovo, which is not a UN-member State and therefore does not have an ISO 3166 code. “XZ” is used in UN/LOCODE for all locations in the international waters.

III. Use of UN/LOCODE for locations in the United Kingdom

10. All locations in the UK of Great Britain and Northern Ireland are assigned with UN/LOCODE starting with the country code “GB”. After analysing the code list of “GB”, we draw your attention to the following findings:

- Non-updated subdivisions in the code list of “GB”

UN/LOCODE entries record the “Subdivision” attribute based on ISO 3166-2. However, in the past five years, the UK has made many changes to UK subdivisions. There is no mechanism to update the subdivisions automatically in UN/LOCODE unless a Data Maintenance Request is submitted each time to update the entry in question. Therefore, the UN/LOCODE secretariat cannot guarantee that all UN/LOCODE entries in Northern Ireland have appropriate subdivision codes and thus it will be difficult to filter all locations in Northern Ireland by using the subdivision.

- Limited available codes to be assigned to new UN/LOCODE entries in the UK

“GB” is one of the top five countries of UN/LOCODE entries. The address space of the coding system for UK is almost used up. Therefore, there are many UN/LOCODE entries for the UK domain using digits, which are not readable as a three-alphabet code.

IV. Way-forward

11. The secretariat has been receiving requests from stakeholders in the business community to denominate locations in Northern Ireland with the “XI” code. The secretariat proposes to discuss the following options in the UN/LOCODE Advisory Group to develop a maintenance strategy:

A. Option 1: Create “=” entry for locations in Northern Ireland:

- The UN/LOCODE Re-engineering Project team has proposed this option for the sake of the software system implementation. We have special entries in the directory, for example, we could create this kind of entry for locations in Northern Ireland, for example, GB LAR = XI LAR

=	CN	Peking = Beijing	Peking = Beijing						
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- In this way, we don’t need to treat “XI” as a real country code so that “XI” will not be included in the drill-down list of the country code in the system and we don’t need to generate a separate code list for “XI”.
- The entries for Northern Ireland have nothing special but being accompanied with those “=” entries.
- This option is recommended by the development team of the new UN/LOCODE maintenance system.

B. Option 2: Assign “XI” for locations in Northern Ireland and “GB” for other locations in the UK:

- This would require a major maintenance task. The maintenance team or secretariat would need to identify all UN/LOCODE entries for Northern Ireland and then replace the code “GB” with “XI”.
- While this may solve the problem for some stakeholders, it might create problems for other stakeholders.

For example, “GB LAR” is assigned to Larne in Northern Ireland. If we change it into “XI LAR”, other stakeholders, such as the maritime transport industry, might prefer to keep using “GB LAR” to identify the port Larne.

- What’s more, it might impact UN/LOCODE child codes.

For example, the International Maritime Organization Port Facility Number is using UN/LOCODE as its parent code.

- Another potential risk is that after this change, “GB LAR” will probably later be requested and assigned to another location in the UK outside of Northern Ireland. This may confuse the UN/LOCODE user community.

C. Option 3: Create double UN/LOCODE entries for locations in Northern Ireland:

- On the request of users with an established business need, a double entry for an existing UN/LOCODE in Northern Ireland is created.
- For example, “GB LAR” is assigned to Larne in Northern Ireland. Upon the request of a stakeholder, the UN/LOCODE secretariat would register “XI LAR” and note in the double registration in the “Remark” column (see option 4).
- This option may confuse stakeholders as some of the commercial and transport documents may contain different UN/LOCODEs for the same location.

D. Option 4: Keep the country code “GB” but add a comment in the “Remark” column:

- We need to identify locations in Northern Ireland by adding “NIR” to flag locations in Northern Ireland and indicating the corresponding code starting with “XI” in the column “Remark”.
- When we assign a new code to a location in Northern Ireland, we still use “GB” as country code but indicate its specialty related to Northern Ireland in the column “Remark”.

For example, for “GB LAR”, we add “NIR: XI LAR” in the column “Remark”.

- This solution might not be sufficient for UN/LOCODE stakeholders who need to identify a location in Northern Ireland through the first two-character of the UN/LOCODE (country/territory code).
- Identifying all UN/LOCODE locations in Northern Ireland would be a significant maintenance task.

E. Option 5: Do nothing

12. This option would not satisfy those stakeholders that have requested the UN/LOCODE secretariat to identify UN/LOCODEs in Northern Ireland through an “XI” code.