Unified interpretations of the Model Regulations

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

Sixtieth session
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Item 11 of the provisional agenda

Unify terminology for “base material” in the Spanish language version

Transmitted by the experts from Brazil, Mexico and Spain

Introduction

1. During the twenty-eighth meeting of the International Civil Aviation Organization (ICAO) Dangerous Goods Panel held in November 2021 document DGP/28-WP/39, which proposed a series of amendments to packing instructions 450 and Y450, was adopted. During the discussion of the document, it was noted that a more comprehensive review of the related UN numbers, special provisions and packing instructions was needed to completely correct the Spanish language version of the Technical Instructions.

2. In the mentioned parts of the Spanish language version of the Technical Instructions the wording for “base material” has not been used consistently, as both “material de base” and “material básico” have been used. Amendments were introduced into the Spanish language version of the Technical Instructions, following a joint proposal from Argentina and Spain.

3. Nevertheless, this inconsistent use of terminology for “base material” in the Spanish language version already exists in the Model Regulations and has been taken over from there into the Technical Instructions. Therefore, and to avoid conflicts in multimodal shipments due to this inconsistency, this issue should be corrected in the Spanish language version of the Model Regulations, and subsequently in the corresponding modal regulations. In this document, changes applicable to the Model Regulations are proposed to the Sub-Committee to modify the Spanish language version of the Model Regulations.

Discussion

4. The Model Regulations try to harmonize the regulations to be applied in all modes of transport, and it is essential to have the same meaning conveyed by all language versions.

* A/75/6 (Sect.20), para. 20.51
5. The Spanish language version of the Model Regulations includes the expressions “material básico” and “material de base” as translation for “base material” in the following parts:

- **UN 3269** - Name and description: “BOLSA DE RESINA POLIESTÉRICA, material básico líquido” (Dangerous goods list (two entries) and alphabetical index).
- **UN 3527** - Name and description: “BOLSA DE RESINA POLIESTÉRICA, material básico sólido” (Dangerous goods list (two entries) and alphabetical index).
- Special Provision 236: “Las bolsas de resina poliestérica tienen dos componentes: un material básico...”.
- Packing Instruction P302 (UN 3269): “el material de base” (this expression is written twice in the text of this packing instruction).
- Packing Instruction P412 (UN 3527): “el material de base” (this expression is written twice in the text of the packing instruction).

6. As the expression “material básico” can also indicate certain chemical properties, that do not apply in this case, Argentina and Spain considered that it would be more convenient to modify the wording to read consistently “material de base”. Therefore, it is proposed to use this expression throughout all the Model Regulations, as has already been done in the Technical Instructions.

7. All relevant changes are shown in the following proposal. The changes proposed are coherent with the ones approved as amendments by the ICAO Dangerous Goods Panel to the Spanish language version of the Technical Instructions (see flimsy No. 8 of the twenty-eighth ICAO panel meeting).

**Proposals**

**Proposal 1**

8. Spain proposes modifying in the Spanish language version of the Model Regulations the text of column (2), name and description of the UN numbers 3269 and 3527 included in the Dangerous Goods List in Chapter 3.2 and in the alphabetical index, as follows (new text is bold and underlined):

<table>
<thead>
<tr>
<th>Nº ONU</th>
<th>Nombre y descripción</th>
</tr>
</thead>
<tbody>
<tr>
<td>3269</td>
<td>BOLSA DE RESINA POLIESTÉRICA, material básico de base líquido</td>
</tr>
<tr>
<td>3527</td>
<td>BOLSA DE RESINA POLIESTÉRICA, material básico de base sólido</td>
</tr>
</tbody>
</table>

**Proposal 2**

9. Spain also proposes modifying in Chapter 3.3 the text of the special provision 236 to be in line with the changes proposed in proposal 1.

“236 Las bolsas de resina poliestérica tienen dos componentes: un material básico de base (ya sea de la clase 3 o de la división 4.1, grupo de embalaje/envase II o III) y un activador (peróxido orgánico). El peróxido orgánico será de los tipos D, E o F y no requerirá regulación de temperatura. El grupo de embalaje/envase será el II o el III, conforme a los criterios de la clase 3 o de la división 4.1, según corresponda, aplicados al material básico de base. El límite de cantidad consignado en la columna 7a de la lista de mercancías peligrosas del capítulo 3.2 se aplica al material básico de base.”