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|  | United Nations | ST/SG/AC.10/C.3/2024/30 |
| _unlogo | **Secretariat** | Distr.: General11 April 2024Original: English |

**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**

**Sixty-fourth session**

Geneva, 24 June - 3 July 2024

Item 6 (d) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods:**

**Other miscellaneous proposals**

 UN 1790 Hydrofluoric acid

 Transmitted by the expert from Spain[[1]](#footnote-2)\*

 I. Introduction

1. A review of the Spanish language version of the *Model Regulations* has revealed a potential error which needs to be rectified, regarding the name of UN 1790 HYDROFLUORIC ACID. This aspect is analysed in section II below.

2. Thanks to this review, Spain also realized that there is a disparity between the references to UN 1790 in the different language versions (English, French and Spanish) of the alphabetical index. We believe that these are worth to be analysed, so these are presented in section III below.

 II. Hydrofluoric acid in the Spanish language version

3. The Spanish language version repeats the entry for hydrofluoric acid in the Dangerous Goods List twice, with the same text. In the English version (and other language versions), one entry refers to the case where the hydrofluoric acid contains more than 60 % of hydrogen fluoride, and the other one to the case where the concentration is lower. Meanwhile, in the Spanish table both lines refer to the case where the hydrofluoric acid contains not more than 60 % of hydrogen fluoride.

 The English version reads as follows:

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1790 | HYDROFLUORIC ACID, with more than 60 % hydrogen fluoride | 8 | 6.1 | I |  | 0 | E0 | P802 | PP79PP81 | T10 | TP2TP13 |
| 1790 | HYDROFLUORIC ACID, with not more than 60 % hydrogen fluoride | 8 | 6.1 | II |  | 1 L | E2 | P001IBC02 |  | T8 | TP2 |

 In the same table, the Spanish version reads:

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1790 | ÁCIDO FLUORHÍDRICO con un máximo del 60 % de fluoruro de hidrógeno | 8 | 6.1 | I |  | 0 | E0 | P802 | PP79PP81 | T10 | TP2TP13 |
| 1790 | ÁCIDO FLUORHÍDRICO con un máximo del 60 % de fluoruro de hidrógeno | 8 | 6.1 | II |  | 1 L | E2 | P001IBC02 |  | T8 | TP2 |

4. Similarly, in the alphabetical index, the Spanish language version mentions the case of the “HYDROFLUORIC ACID, with not more than 60 % hydrogen fluoride” but leaves out the other case, which is included in both the English and the French versions.

 The English version reads as follows:

|  |  |  |
| --- | --- | --- |
| HYDROFLUORIC ACID, with more than 60 % hydrogen fluoride | 8 | 1790 |
| HYDROFLUORIC ACID, with not more than 60 % hydrogen fluoride | 8 | 1790 |

 While the Spanish version reads as follows:

|  |  |  |
| --- | --- | --- |
| ÁCIDO FLUORHÍDRICO con un máximo del 60 % de fluoruro de hidrógeno | 8 | 1790 |

5. Proposals 1 and 2 under section IV below propose the necessary amendments to the Spanish language version.

 III. Disparities between the different language versions in the alphabetical index

6. The different language versions give different references to UN 1790 in the alphabetical index. There are a total of four cases when UN 1790 is mentioned in the English language version, vis-à-vis the French and Spanish versions that only have two (three in the Spanish language version, after the Spanish language version is corrected following proposal 2). Therefore, it seems to be interesting to have a further look into these references and see if it is necessary to include these, or if they should be deleted.

7. The English, French and Spanish versions reference to UN 1790 in the alphabetical index as follows:

|  |  |  |
| --- | --- | --- |
| Fluoric acid, see | 8 | 1790 |
| HYDROFLUORIC ACID, with more than 60 % hydrogen fluoride | 8 | 1790 |
| HYDROFLUORIC ACID, with not more than 60 % hydrogen fluoride | 8 | 1790 |
| Hydrogen fluoride solution, see | 8 | 1790 |
| ACIDE FLUORHYDRIQUE contenant au plus 60 % de fluorure d’hydrogène | 8 | 1790 |
| ACIDE FLUORHYDRIQUE contenant plus de 60 % de fluorure d’hydrogène | 8 | 1790 |
| ÁCIDO FLUORHÍDRICO con un máximo del 60 % de fluoruro de hidrógeno | 8 | 1790 |
| Fluoruro de hidrógeno, véase | 8 | 1790 |

8. The English language version points for “Fluoric acid” to UN 1790, whereas this reference is left out in both the Spanish and French version. “Fluoric acid” is an informal way of referring to the “hydrofluoric acid”. The proper name of this substance is: “hydrofluoric acid”, and its component “hydrogen fluoride”, which are already included in the list. It could made sense to use the term “fluoric acid” in the past, but its use is currently obsolete. Because of this, it may be appropriate to open the discussion to update this term and remove this reference from the list. The corresponding amendment can be found as proposal 3 under section IV.

9. The English language version for “Hydrogen fluoride solution” refers to UN 1790. The translation for the Spanish version is included and appropriate, but this reference is missing in the French version. To be consistent in the translation, and harmonizing the lists across all languages, Spain believes that it could be beneficial to add this reference to the French list as “fluorure d’hydrogène”. Hydrofluoric acid is a solution of hydrogen fluoride (as indicated by the name of UN1790); therefore, it would be interesting that all language versions point to UN 1790 HYDROLUEORIC ACID when looking for hydrogen fluoride, and therefore the French language version should be amended as proposed under proposal 4 under section IV.

10. The Spanish version misses one reference to the “ÁCIDO FLUORHÍDRICO” as pointed out in section II, paragraph 5 above; this issue should be corrected with proposal 2 under section IV below.

 IV. Proposals

 A. Proposals for the Spanish language version

 Proposal 1

11. For the Spanish version only, amend the entry for UN 1790 as follows (new text in **bold**, deleted text ~~stricken through~~):

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1790 | ÁCIDO FLUORHÍDRICO con ~~un máximo~~ más del 60 % de fluoruro de hidrógeno | 8 | 6.1 | I |  | 0 | E0 | P802 | PP79PP81 | T10 | TP2TP13 |
| 1790 | ÁCIDO FLUORHÍDRICO con un máximo del 60 % de fluoruro de hidrógeno | 8 | 6.1 | II |  | 1 L | E2 | P001IBC02 |   | T8 | TP2 |

 Proposal 2

12. In the alphabetical index, for the Spanish version only, insert a new entry as follows (newtext is in **bold**):

|  |  |  |
| --- | --- | --- |
| **ÁCIDO FLUORHÍDRICO con más del 60 % de fluoruro de hidrógeno** | **8** | **1790** |
| ÁCIDO FLUORHÍDRICO con un máximo del 60 % de fluoruro de hidrógeno | 8 | 1790 |
| ÁCIDO FLUORHÍDRICO Y ÁCIDO SULFÚRICO, MEZCLA DE | 8 | 1786 |

 B. Proposal for the English language version

 Proposal 3

13. In the alphabetical index, for the English version only, delete the following entry as follows (deleted text is stricken through):

|  |  |  |
| --- | --- | --- |
| ~~Fluoric acid, see~~ | ~~8~~ | ~~1790~~ |

 C. Proposal for the French language version

 Proposal 4

14. In the alphabetical index, for the French version only, insert the following entry (new text is in **bold**):

|  |  |  |
| --- | --- | --- |
| **Fluorure d’hydrogène, voir** | **8** | **1790** |

 V. Justification

15. Harmonizing the different language versions, and correcting the different language versions, helps to maintain the same understanding of the *Model Regulations* in all languages.

16. Maintaining the *Model Regulations* updated contributes significantly to the achievement of Sustainable Development Goal 9 (Industry, Innovation and Infrastructure) of the UN 2030 Agenda. They aim to improve industrial safety by strengthening safety standards for the industry by establishing more rigorous protocols for the transport of dangerous goods. By improving industrial safety, accident risks are reduced and the lives and health of workers and surrounding communities are protected.

1. \* A/78/6 (Sect. 20), table 20.5. [↑](#footnote-ref-2)