

## 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

Thirtieth session  
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Item 10 of the provisional agenda

### ANY OTHER BUSINESS

#### Transport of Dangerous Goods Documentation

##### Note by the secretariat

1. Reference is made to 5.4.1.2.5 of the Model Regulations and the related footnote 1.
2. The United Nations Centre for Trade Facilitation and Electronic Business (UN/CEFACT) is currently revising its Recommendation No. 11 on Documentary Aspects of the International Transport of Dangerous Goods. The text has been simplified to refer to Chapter 5.4 of the UN Model Regulations whenever appropriate and to take account of the increased harmonization of related specific mode regulations.
3. A draft revised text has been developed by the UN/CEFACT International Trade Procedures Working Group (ITP WG) (“TBG15”), which should be adopted by this group at its 1-2 February 2007 meeting. The group agreed at its last session in November 2007 that the text should be brought to the attention of the Sub-Committee for comments before its final adoption.
4. Therefore, the Sub-Committee is invited to consider the attached draft revised Recommendations No. 11 and provide comments as deemed appropriate.



**UNITED NATIONS  
CENTRE FOR TRADE FACILITATION AND ELECTRONIC BUSINESS  
(UN/CEFACT)**

**INTERNATIONAL TRADE PROCEDURES WORKING GROUP (ITPWG) - TBG15**

**Draft revised Recommendation 11.**

**SOURCE:** Recommendation 11 Subgroup

**ACTION:** For decision at the ITPWG meeting on 1-2 February 2007, agenda item

## Recommendation No. 11<sup>1</sup>

# DOCUMENTARY ASPECTS OF THE INTERNATIONAL TRANSPORT OF DANGEROUS GOODS

### INTRODUCTION

In 1978 the UNECE Working Party on Facilitation of International Trade Procedures approved Recommendation No.11 on “Documentary Aspects of the International Transport of Dangerous Goods”, where it recommended harmonizing information requirements and simplifying documentary procedures affecting the transport of dangerous goods. It listed a number of recommendations on the actions, that Governments and international organizations entrusted with the establishment and/or administration of relevant conventions and regulations could take to achieve these goals. The Working Party agreed to review, at regular intervals, national and international measures for the implementation of the approved Recommendation.

Recommendation No.11 was revised in 1995 to reflect the major changes to the instruments applicable to the sea, air, road or rail transport of dangerous goods. The revised document offered recommendations for action in two areas: the information requirements (the actual data shown on the Dangerous Goods Form) and the actual means of transferring the data, either by paper document or Electronic Data Interchange (EDI).

In 2005, the United Nations Centre for Trade Facilitation and Electronic Business, which replaced the UNECE Working Party on Facilitation of International Trade Procedures, initiated the third revision of Recommendation No. 11 to reflect significant harmonization at both international and regional levels, which was achieved since the second revision. The UN/CEFACT approved the third revision of Recommendation No.11 at its \_\_\_\_ session in \_\_\_\_\_. The session was attended by representatives from: Austria; .... Representatives from Australia, .... participated under Article 11 of the Commission's terms of reference. The session was also attended by representatives of the secretariats of the United Nations Conference on Trade and Development (UNCTAD), ..., as well as by representatives of the following intergovernmental and non-governmental organizations: ....

### RECOMMENDATIONS

The United Nations Centre for Trade Facilitation and Electronic Business at its \_\_\_\_ session in \_\_\_\_ agreed to recommend to Governments and international organizations entrusted with the establishment and/or administration of conventions and regulations on the transport of dangerous goods that action should be taken to harmonize information requirements in accordance with the following recommendations:

- I. The harmonization of the overall information requirements of dangerous goods documents between the different modes of transport should be pursued as a matter of priority. This should be carried out according to the United Nations Recommendations on the Transport of Dangerous Goods (hereafter referred to as the “UN Model Regulations”) in their latest edition.

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<sup>1</sup> Last updated on November 21 2006, based on comments from ITPWG-TBG15 members.

- II. The data elements required to identify the goods should be standardized throughout the different modes of transport. The sequence of the dangerous goods description set out in the UN Model Regulations should be followed to assist proper transcription and recognition of details (UN Number, proper shipping name and classification information with primary hazard class and/or division, subsidiary hazard class and/or division, if any, and packing group, if any).
- III. When applicable, the single form of words held in the UN Model Regulations should be adopted as the text for the legal declaration if such a declaration is required by regulations and conventions governing different modes of transport:  
“I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.”
- IV. It should be possible to derive the emergency information from the data elements to ensure that no additional information is required. The manual entry of additional related information or codes on documents should not be required.
- V. A dangerous goods form supplied for one mode of transport, irrespective of whether it is an electronic (EDI) message or a paper document, should be valid for subsequent modes of transport in multimodal movement.
- VI. Whenever possible, the dangerous goods information, data elements and, where appropriate, declaration should be incorporated in, or combined with, an existing transport or cargo handling document.
- VII. Where it is not possible to incorporate the dangerous goods information in an existing document, the form used should be designed in accordance with the aligned recommended layout contained in the UN Model regulations (Multimodal Dangerous Goods Form).
- VIII. Regulations and Conventions should not preclude the transmission of dangerous goods information by electronic means such as EDI and any legal barriers, which exist, whether they be national or international, should be removed. Where possible this method of transfer of information should be actively encouraged.
- IX. Where special additional requirements exist, regulations and conventions should permit incorporation of the necessary data in the dangerous goods transport document itself, as an alternative to a separate document.

## GUIDELINES TO RECOMMENDATION NO. 11

- I. The harmonization of the overall information requirements of dangerous goods documents between the different modes of transport should be pursued as a matter of priority. This should be carried out according to the United Nations Recommendations on the Transport of Dangerous Goods (hereafter referred to as the “UN Model Regulations”) in their latest edition**

Simplifying and harmonizing documentary and procedural requirements for the transport of dangerous goods laid down in various national and international regulations would benefit all parties involved in these operations. It would ensure less risk of damage to goods and equipment, fewer delays in the movement of goods, in the preparation and receipt of documents, and reduced costs for paperwork and administration. Progress in this area is therefore essential for achieving simple, transparent and effective processes for global commerce.

To help countries rationalize and standardize the documentary aspects of the transport of dangerous goods, the original Recommendation No.11 offered a standardized recommended layout for the design and information content of dangerous goods form and advised using a single form for any mode of transport and between any of the parties engaged in the movement of goods. Since the last revision of Recommendation No.11, the United Nations Economic and Social Council’s Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals made major steps towards harmonizing the overall requirements for all the modes of transport by amending the United Nations Recommendations on the Transport of Dangerous Goods – Model Regulations (the UN Model Regulations). The UN Model Regulations present a basic scheme of provisions to allow uniform development of national and international regulations governing the various modes of transport; while offering enough flexibility to accommodate any special requirements that might have to be met. The structure of the major legal instruments governing international carriage of dangerous goods is consistent with that of the UN Model Regulations. These major legal instruments are the International Maritime Dangerous Goods Code (IMDG Code of the International Maritime Organization), the Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO-TI of the International Civil Aviation Organization), the European agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN), the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) and the Regulations concerning the International Carriage of Dangerous Goods by Rail (RID Annex C to the Convention concerning International Carriage by Rail, COTIF). The UN Model Regulations address the issue of the documentary aspects of the transport of dangerous goods and offer a harmonized (“model”) approach to transport documentation, container/vehicle packing certificate and emergency response information<sup>2</sup>.

- II. The data elements required to identify the goods should be standardized throughout the different modes of transport. The sequence of the dangerous goods description set out in the UN Model Regulations should be followed to assist proper transcription and recognition of details (UN Number, proper shipping name and classification information with primary hazard class and/or division, subsidiary hazard class and/or division, if any, and packing group, if any).**

This part of Recommendation No.11 advises that data requirements throughout the different modes of transport be aligned to the elements listed in the UN Model Regulations, namely: UN Number, proper shipping name and classification information with primary hazard class and/or division, subsidiary hazard class and/or division, if any, and packing group, if any.

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<sup>2</sup> See Chapter 5.4 of the UN Model Regulations.

This sequence of the dangerous goods description ensures that the transport documents for dangerous goods convey the fundamental information relative to the hazard of the goods being offered for transport.

**III. When applicable, the single form of words held in the UN Model Regulations should be adopted as the text for the legal declaration if such a declaration is required by all regulations and conventions governing different modes of transport:**

**“I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.”**

The transport of dangerous goods may require a certification or declaration that the consignment is acceptable for transport and that the goods are properly packaged, marked and labeled and in proper condition for transport in accordance with the applicable regulations. The wording of the dangerous goods declaration is of legal and practical importance, whether it appears on a separate document or is combined with a transport or cargo handling document. In most cases, declarations required under various Conventions and regulations are similar or identical in meaning but simply use different words. In order to overcome the problems of multimodal transport, the UN Model Regulations offer a standardized wording for such a notification, which should be used when required as the text for the legal declaration by all regulations and conventions governing different modes of transport.

**IV. It should be possible to derive the emergency information from the data elements to ensure that no additional information is required. The manual entry of additional related information or codes on documents should not be required.**

It is necessary to ensure that appropriate information be immediately available at all times, for use in emergency response to accidents and incidents involving dangerous goods. It should be available separately from the packages containing the dangerous goods, and readily and easily accessible in the event of an accident or incident.

The emergency information may be derived from the dangerous goods information already included in the data elements recommended by the UN Model Regulations (e.g. UN number, proper shipping name and classification information). Some separate documents cross-referencing emergency information to UN numbers and proper shipping names are available. Such documents have been prepared by ICAO (“Emergency Response Guidance for Aircraft Incidents Involving Dangerous Goods”) and IMO (“Emergency Response Procedures for Ships Carrying Dangerous Goods” and “Medical First Aid Guide for use in Accidents Involving Dangerous Goods”) and by certain governments for inland transport (e.g. the Emergency Response Guidebook in the United States of America, Canada and Mexico).

**V. A dangerous goods form supplied for one mode of transport, irrespective of whether it is an electronic (EDI) message or a paper document, should be valid for subsequent modes of transport in multimodal movement**

In addition to reducing the number of documents required for the transportation of dangerous goods, the use of one form for all modes of transport helps diminish the risk of errors and the burden of reentering the same data.

This part of Recommendation No.11 can be implemented by using the Multimodal Dangerous Goods Form (MDGF) as advised in Part VII of this Recommendation. Once the consignor has completed the MDGF and other appropriate documentation it should not be necessary for the technical data to be re-written, amended or transferred to another document by any party. Where there is a change of carrier or mode of transport during the movement of a consignment it will be the responsibility of the carrier undertaking the onward movement of the goods to complete the "Carrier" box giving his name and address details.

It is recommended that no more than six original copies of the MDGF should be required for multimodal transport operations. This decision is based on the assumption that no more than four modes of transport were likely to be used for a single shipment and, whilst a mode could be reused at a later stage in the transport chain, it would not be feasible or realistic to recommend more copies. If further copies of the document were required to be retained by the consignee or any other party other than the authority, then photocopies should be made. This should also be the case where the authority does not require an original signature.

Also linked to the use and destination of the individual copies of the MDGF is the question of the data that will change with the mode of transport. This includes information in the "carrier" box, "Vessel/flight no. and date", "Port/airport of loading" and "Port/airport of discharge" boxes. With subsequent changes in the mode of transport there is likely to be a change of carrier etc. and therefore these boxes may have to cope with a different name and address on each copy of the form. To cater for this possibility it is necessary that this box, when the document is used in a carbonized set, is desensitised so that the information only appears on the top sheet.

**VI. Whenever possible, the dangerous goods information, data elements and, where appropriate, declaration should be incorporated in, or combined with, an existing transport or cargo handling document;**

Combining the dangerous goods information with an existing transport or cargo-handling document helps reduce the number of documents and thereby minimize both risk and costs of documents and procedures.

The UN Model Regulations state that a dangerous goods transport document itself may be in any form, provided it contains all of the required information. The document may be that already required by other regulations in force for carriage<sup>3</sup>. The dangerous goods transport information may be incorporated in, or combined with, an existing transport or cargo-handling document, provided the information on dangerous goods is easy to identify, legible and durable. For example, the dangerous goods transport information may be included in:

- (a) Application for forwarding/shipment of cargo;
- (b) Export Cargo Shipping Instructions or multimodal Transport Cargo Booking Form as used by many multimodal transport companies;
- (c) Cargo handling documents for example, shipping notes for cargo reservation, dock delivery, and tallying;
- (d) Dangerous goods manifest, as required by SOLAS 74, regulation VII/ 5.5, MARPOL 73/78 and FAL 65, standard 2;

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<sup>3</sup> One widely used road consignment note is the 'CMR Note'. The Convention on the Contract for the International Carriage of Goods by Road (CMR) lists the particulars that the consignment note shall contain and establishes the uniform conditions governing the contract for the international carriage of goods by road, particularly with respect to the documents used for such carriage and to the carrier's liability. Similarly many other conventions governing the contract of carriage include other document requirements than those related specifically to the transport of dangerous goods (such as COTIF and SMGS in rail transport).

- (e) Shipowner's Stowage Order. This can be an additional copy of the document containing the dangerous goods information, which is returned to the shipper, annotated by the carrier with dock delivery authorization and instructions;
- (f) The Main Transport Document, i.e. Road/Rail/Sea/Air Waybill or Consignment Note, or Multimodal Transport Document in accordance with the UNCTAD/ICC Rules for Multimodal Transport Documents.

The UN Model Regulations recommend, as required by the IMDG code, that when dangerous goods are packed or loaded into any container or vehicle which will be transported by sea, those responsible for this operation provide a "container/vehicle packing certificate" specifying the container/vehicle identification number(s) and certifying that the operation has been carried out in accordance with the requirements set out in the UN Model Regulations. They advise to incorporate the dangerous goods transport document and the container/vehicle packing certificate into a single document; and, if this is not possible, to attach these documents one to the other.

**VII. Where it is not possible to incorporate the dangerous goods information in an existing document, the form used should be designed in accordance with the aligned recommended layout contained in the UN Model regulations (Multimodal Dangerous Goods Form);**

Modal requirements or multimodal movements can make it impossible to incorporate dangerous goods information, data elements and, where appropriate, declaration in existing transport documents, as advised in Part VI. In these cases, dangerous goods documentation can still be simplified and harmonized through the use of Multimodal Dangerous Goods Form (MDGF) given in the UN Model Regulations.

The MDGF layout is fully aligned with the United Nations Layout Key for Trade Documents, elaborated in 1973 to offer countries an international basis for the standardization of documents used in international trade and transport and for visual display representations of such documents<sup>4</sup>. The central body of the form is an area for the description of the goods being transported and allows the layout of the hazardous information to be as flexible as possible and, therefore, accommodates the data requirements in the individual modal regulations. A short notation is shown in the left hand margin of the form, which draws attention to the additional information and the need to comply with the applicable modal regulations. As well as the information shown, further advice on completion of the form could also be included. The MDGF fulfils not only the function of a dangerous goods form, but also that of a packing certificate and receiving organization receipt.

**VIII. Regulations and conventions should not preclude the transmission of dangerous goods information by electronic means such as EDI and any legal barriers, which exist, whether they be national or international, should be removed. Where possible this method of transfer of information should be actively encouraged;**

The Model Regulations do not preclude the use of electronic data processing (EDP) and electronic data interchange (EDI) transmission techniques as an aid to paper documentation. According to the ADR, RID and ADN these are permitted also instead of paper documentation, provided that the procedures used for the capture, storage and processing of electronics data meet the legal requirements as regards the evidential value and availability of data during transport in a manner at least equivalent to that of paper documentation.

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<sup>4</sup> For more information consult, *UN Layout Key for Trade Documents - Guidelines for Applications*, [http://www.unece.org/cefact/recommendations/rec01/rec01\\_ecetr137.pdf](http://www.unece.org/cefact/recommendations/rec01/rec01_ecetr137.pdf)

Recommendation No.11 encourages countries to adopt the electronic exchange of data, which is frequently more efficient and more reliable.

**IX. Where special additional requirements exist regulations and conventions should permit incorporation of the necessary data in the dangerous goods transport document itself, as an alternative to a separate document.**

Transportation of some dangerous goods, such as radioactive substances or government exemption, may be subject to special additional documentary requirements. Some of these requirements have been laid down in the transport document (e.g. various statements required by RID or ADR). Other requirements, such as weathering certificates, statements of approved classification by the competent authority, approval certificates and exemption certificates, may have to be provided in addition to the transport document. In the Multimodal Dangerous Goods Form, a short notation is shown in the left hand margin of the form to draw the attention of persons completing the form to the fact that special information is required in the circumstances described above. When deemed appropriate, additional information, which would facilitate carriage of dangerous goods, may also be incorporated in the transport documents.

**ANNEX A**

**Annex to Recommendation No. 11**

**Chapter 5.4 of the Model Regulations**

The United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations (14<sup>th</sup> revised edition) published by the United Nations:

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The UN Model Regulations are regularly amended and updated at succeeding sessions of the Committee of Experts every 2 years pursuant to resolutions of the Economic and Social Council.

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