Annex III: Comment Sheet for Round 3 of the PG on Rev. Rec. 16
(Country/Organization: BIC   )

REQUEST : The participants are invited to make any additional proposals for improving the draft text V2.

Country / Organization	The participants are invited to make any additional proposals for improving the draft text V2.
BIC	B PURPOSE 1st para 3rd line : "transhipmentand" should be : transhipment and 2nd para 8th line "rendering of the name of the location should be used the most commonly in international trade, if appropriate" This sentence is not clear, should be rewritten ***

Para 3, definitions

I propose to reorganize this paragraph as follows :

3. DEFINITIONS

The following definitions have been adopted for the purposes of this Recommendation:

3.1. UN LOCODE

The United Nations Code for Trade and Transport Locations is a geographic coding scheme developed and maintained by United Nations Economic Commission for Europe (UNECE). UN/LOCODE identifies a location in the sense of a city / a town / a village, being the smaller administrative area existing as defined by the competent national authority in each country.

3.2. NATIONAL FOCAL POINT

A public or private organization which has been delegated the responsibility to maintain the list of UNLocode by a national authority in its country.

National focal points form a group of experts who are dedicated to improving the quality of the UN/LOCODE under auspices of "Terms of Reference for the UN/LOCODE Focal Points" published by the Bureau on 11 February 2016 under ECE/TRADE/C/CEFACT/2016/16.

3.3. FUNCTIONS

The functions are the different type of facilities or services which are available inside a location to support trade and transport activities, such as :

(The number of functions is not limited inside one location).

Port: Any location with permanent facilities at which vessels can load or discharge cargo moving in maritime or internal waterway traffic.

Specific facilities located inside the area of a port, like terminals, repair yards or roadsteads, shall not be consider individually as a location. Exceptions are accepted for: 1) facilities that have a recognizable differentiated importance, be it economic, historical, scientific, political, military, or any other; or 2) facilities that are based on different sub-divisions to be clearly differentiated of the port to which it belongs, having clearly different geographical coordinates. Port facilities that are outside of the recognized area of a port can also be identified individually as a location.

BIC remarks on point 1 and 2 :
Point 1) one should avoid having a UNlocode embedded into another UNLocode, or overlapping another UNlocode, as it creates confusion on which code has to be used. Functions should be used to address this kind of requirements.
Point 2) When a port is large enough to have part of its facilities located in a different location (as per definition 3.1.), then another location/UNLocode should be created to host this function/facility together with others which can also be found in the same area (container depot, rail terminal …)
These remarks are valid for all functions

Airport: Any location with permanent facilities at which aircraft can load or discharge cargo moving in air traffic.

Inland Clearance Depot (ICD): A common user facility, other than a port or an airport, approved by a competent body, equipped with fixed installations and offering services for handling and temporary storage of any kind of goods (including containers) carried under Customs transit by any applicable mode of transport, placed under Customs control and with Customs and other agencies competent to clear goods for home use, warehousing, temporary admission, re-export, temporary storage for onward transit and outright export. (Definition applies also to synonyms like Dry Port, Inland Clearance Terminal, etc.)

Inland freight terminal: Any facility, other than a port or an airport, operated on a common-user basis, at which cargo in trade is received or dispatched.

Location: Any named geographical area, recognized by a competent national body, either with permanent facilities used for goods movements associated with trade, and used for these purposes, or proposed by the Government concerned or by a competent national or international organization for inclusion in the UN/LOCODE **The geographical coordinates associated to a location shall be precise enough to differentiate the named area from other areas with similar names.**

Railway connected location: **Any location that has one or more railway terminals, like cargo terminals or train stations (exclude passenger terminals). Specific terminals located inside a location shall not be consider individually as a location. Exceptions are accepted for: 1) railway terminals that have a recognizable differentiated importance, be it economic, historical, scientific, political, military, or any other; or 2) railway terminals that are distant enough to be clearly differentiated of the location to which it belongs, having clearly different geographical coordinates.**

Road connected location: **Any location that is connected to other ones by means of roads. Specific terminals located inside a location shall not be consider individually as a location. Exceptions are accepted for: 1) road terminals that have a recognizable differentiated importance, be it economic, historical, scientific, political, military, or any other; or 2) road terminals that are distant enough to be clearly differentiated of the location to which it belongs , having clearly different geographical coordinates.**

International Mail Processing Center: **A facility authorized by national competent agencies and recognized by Universal Postal Union to process international mail and parcels (also known as postal exchange office).**

Border crossing location: **Any location that is located on the border with other countries. Specific border crossing points located inside a location shall not be consider individually as a location. Exceptions are accepted for: 1) border crossing points that have a recognizable differentiated importance, be it economic, historical, scientific, political, military, or any other; or 2) border crossing points that are distant enough to be clearly differentiated of the location to which it belongs , having clearly different geographical coordinates.**

Fixed transport location: **Any location with permanent facilities to load or discharge cargo that doesn't fit in the previous definitions (e.g. oil platform).**

Special Economic Zone (SEZ) – Any geographical region that has economic laws different from a country's typical economic laws for the purposes of trade operations and duties and tariffs.

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4.2.8
GB LHR Heathrow Apt/London

BIC Remark
As per definition of the UNLocode (para 3.1.), airports as any other function should not be identified as a location, so in the above case :
GBLHR UNLocode should stand for "Heathrow" (the location where the function airport can be found), with, between others, the function 4, and Heathrow London airport should be handled by the child code IATAI

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4.7
Some cleaning has to be done to list the codes (several codes on the same line, ie. AQ, UR)

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5.1
BIC Remark :
I would rather not mention a part 2 and 3 as this is the list of codes which are not subject to the same rhythm of publication than the recommendation itself.
The rhythm of publication of the list of locodes has to be set as deemed appropriate in the recommendation. And only a reference should be made to the country standard list, without publishing it as a part of the recommendation.
I do not see exactly what the part 1 covers.

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5.1.5.5 Child codes of UN/LOCODE identify locations inside the main UN/LOCODE
Should be :
Child codes of UN/LOCODE identify facilities inside a location coded in the UN/LOCODE list ……..
And add at the end of the paragraph :
The type of services delivered by these facilities are referred to as functions in the UNlocode list.

6.1
Delete "maintenance group" and insert "Registration Authority"

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7.
Redundant with 5.1.2 ?

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8.1.1 second para
I propose the following wording :

Any ambiguity created by the duplication of the same location must be avoided. A location that matches the a.m. definition (please also refer to para 3.1.) should not be included if it is geographically a part of an already existing location with a UN/LOCODE. If the function for the requested location is missing for the already existing location, then the function should rather be added to the existing location than creating a dedicated UNLOCODE.
In the case a location code is not available, then a new UNLocode has to be registered - in respect of the definition set forth in paragraph 3.1. - to host the said function(s).

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8.1.3.
I propose the following wording :
Under no circumstances will the UN issue two different codes for the same location. The UN secretariat in charge, with the support of the National Focal Points, will make every effort to prevent this by checking alternative spelling, naming and geo-coordinates before adding a new location.

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8.2.2.1.2
Redundant ? should be deleted

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8.2.2.2.2
I propose the following wording :
Pending the outcome of such scrutiny, and provided that the other criteria are fulfilled, the proposed entry may be included under the status classification "RQ" (Request under consideration).

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9.
I would propose following reorg

9.   DELETIONS AND CHANGES

9.1   Deletions of entries

Under no circumstances will the UN code for an existing location be changed. Once a location is assigned a code, that code will be permanently assigned to the location

As an exception, entries existing in the UN/LOCODE may be deleted only in the case of duplication of entries, of misspelling or manifest misunderstanding of an entry name for which a correct version already exists elsewhere in the UN/LOCODE, or on notification by an authoritative body that the location is no longer used for goods movements associated with trade. In the last case, the proposal for deletion will be submitted to UN/CEFACT Codes Working Group (CDWG) for approval on this basis. Entries to be deleted in the next published version of the UN/LOCODE will be marked by a letter X preceding the entry; they will be deleted from the subsequent version but will be retained in a special file in the UN/LOCODE database (with the exception of duplicates and misspellings). Code elements for deleted locations will be reserved for five years. Child code user organizations may follow

revisions on the online list of UNLOCODE.

9.2.Changes to entries

9.2.1   Changes of an existing code element will be made only in cases of code duplication within the country concerned, manifest coding error, or, if required by an authoritative body concerned when a place name change removes the mnemonic association with the new place name. Replacement code elements will be selected in accordance with the provisions in paragraph 20 of Recommendation 16. Entries for which code elements have been changed will be marked with a vertical bar (|) in the next published version of the UN/LOCODE.

9.2.2   Other changes to an existing entry may be made when the spelling of the location name proves to be incorrect or particulars referring to the administrative subdivision or the functions of the location are erroneous or incomplete. In the latter two cases the change will be based on information provided by the competent authority concerned. In cases involving change of the location name, entries which have been changed will be marked with a vertical bar (|) or a **hashtag (#)** in the next published version of the UN/LOCODE.

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10.1
Typo, should be

The secretariat will maintain a list of the organizations and individuals …..

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CHILD CODES LIST

I propose to adjust as follows

A Child Code is a code that identifies a facility where a service, or a set of services, is (are) made available for the trade within the geographic area of a UN/LOCODE. This could be an airport or a container terminal or an inland clearance depot within the locality that is defined by the UN/Locode. (as per definition set in para 3.1.)
The Child code would depend on a particular UN/Locode. Only valid UN/Locodes that are published in the official directory may be used in a Child Code List.
Following organizations are recognized by UN/CEFACT as maintaining a Child Code List (*might be incomplete*).

Organization =   BIC – Bureau International Des Containers
Website =   www.bic-code.org/locodes
Name of Code List =   BIC Facility Codes
Context=   It identifies any facility where containers are handled in the scope of their operations
Usage =   Used to identify uniquely facilities in electronic data exchanges.
Example Code =   "ITMIL SOGA" denotes "Logitainer SRL, in location Milano, Italy."

Organization =   SMDG – Ship Message Design Group
Website =   www.smdg.org/index.php/smdg-code-lists
Name of Code List =   "SMDG Master Terminal Facilities List"
Context=   It defines container terminals in seaports, used by the container shipping industry
Usage =   They are used in EDIFACT messages for communication of load lists, discharge instructions, container move reports, vessel schedules, etc.
Example Code =   "DEHAM CTA" denotes "Container Terminal Altenwerder, Hamburg"

Organization =   IMO – International Maritime Organization
Website =   https://gisis.imo.org/Public/ISPS/Default.aspx

		Name of Code List = "Global Integrated Shipping Information System" Context= It defines port facilities of all kind, with focus on maritime security compliance with the ISPS regulation Usage = *to be defined* Example Code = "GBLIV-0027" denotes "City of Liverpool Cruise Terminal" Other child code lists which could be included : IATA Airline Coding Directory ECLA Ports Code, Edition March 1978 ESCAP Port Code of the World, 1979