

Private and Confidential

Notes of the Dangerous Goods Meeting 29th May 2019.

The Meeting was held on the 29th May 2019 commencing at 10.30 hours. The meeting was held at the offices of BIFA, Redfern House, Browells Lane, Feltham, TW13 7EP.

Agenda item 1, Competition Statement

The Competition Statement was read by the Chair at the commencement of the meeting and the statement was also included on the Attendance Log for reference.

Agenda item 2, Agree Notes of the meeting of the 30th January 2019

The meeting agreed that these were an accurate reflection of the meeting and the notes were adopted.

It was noted that not all attendees had received the new agenda or copy of the last minutes with the latest meeting invitation and therefore the method of distribution will be checked by the secretariat.

Agenda Item 3, Matters arising from the meeting 30th January 2019

Action Point 1: A paper on the problems being caused by carriers asking for SDS and details of UN Certified marking on packaging, was to be prepared for presentation to the IMO. However, members advised that the relevant role at the IMO is currently vacant, so there is no one to present a paper to.

Agenda item 4, Maritime Update

The Chair noted that the item for discussion - ADR 5.4.1.1.1(f) should be moved to Agenda item 5, the Road update.

The topic regarding the Feedback from article "TT club warning about ships fired" generated a lot of discussion.

The meeting heard that Dangerous Goods represent 10% of goods carried. Within that 10%, 20% are badly loaded. A common problem is that the Dangerous Goods are not loaded by the doors of the container with the labels in view. It was noted that the standard of securing cargo in both

containers and trucks, is poor and that Forwarders have a responsibility to look at their loading procedures.

There was further discussion about the five big fires that have occurred since the start of 2019 and what the possible causes could be, including the common use of Lithium Batteries in products. Also, at least two of the fires occurred on vessels that were transporting cars in containers. Some of the issues that are regularly encountered are:

- Second-Hand cars loaded in containers with personal effects inside the vehicle and packed around the vehicle inside the container. The Freight is described as “Personal Effects”
- Goods declared as Personal Effects, but cars included and not declared
- Second-Hand cars stored in the container, suspended from the roof and sometimes supported by old tyres, etc

Shipping lines take it in good faith that batteries have been disconnected and there is no fuel left in the vehicles, but this is not always the case. Also, there are still too many cases of undeclared or mis-declared Dangerous Goods.

It was noted that since Keith Bradley retired, the interaction with the MCA has not been the same and there have not been any meetings of the Standard Advisory Committee (SAC). Those meetings are valuable as they provide a forum to discuss Dangerous Goods issues related to Containers, Bulk and RoRo, and the opportunity to agree papers for submitting to the IMO.

The meeting was advised about the DGSA at Felixstowe Port who is now checking Import and Transshipment Containers, which is a change of tack and is causing a problem because of the number of Import Containers that are being stopped, sometimes for issues such as a dishevelled placard.

Whilst members agreed that compliance is important, there are delays for deliveries and additional costs to be considered. These stops at the Port of arrival, are happening after the goods were accepted at the Port of origin and they have already completed the sea freight leg of the journey. Maersk are planning to set up a meeting with Port Authorities to discuss this matter. The same type of action is reported from the USA

A member of the group gave a brief report about a meeting he attended at the International Chamber of Shipping, where he participated on the ‘Container Panel and Dangerous Goods Forum’. He explained the intention to review every ‘Special Provision’ with a view to removing those that can be mis-used and explained how shipments of Charcoal are often declared as Non-Hazardous because the process for testing by shippers is not robust enough.

The new re-usable packaging for Lithium Batteries, developed by CHEP was discussed and it was noted as a matter of interest that indicates progress in the field. However, the new packaging is not yet acceptable for use as it is not in the regulations. This would have to be submitted by CHEP to the UN Sub-Committee of Experts on the Transport of Dangerous Goods (UN SCOE TDG) and if approved, it would go into the next edition of the UN Recommendations for the Carriage of dangerous Goods for a subsequent trickling down to the Modal Regulations.

Agenda item 5 Road Update

The meeting was advised that the 2019 ADR Regulations are mandatory from the 1st July.

If using 1.1.3.6 load exemption, then “Transport Category” calculation, must be on the transport document. An example of a MOD DGN incorporating this information was discussed and received positive comments.

The meeting also heard that 1.10 ADR requires carriers of “High Consequence Dangerous Good” to have a security plan. The requirement should be identified at time of booking.

The plan should include:

- Safe Loading area (with no public access)
- A route plan
- Safe off-loading area (similar to loading requirements)

The group discussed the matter of responsibility for the security plan and agreed that the plan should be for the consignment and therefore the consignor should be responsible for the plan and not several different security plans along the supply chain. However, all parties/sub-contractors should conform.

Agenda Item 6 Air Update

One member stated that IATA training does not include how the cargo gets to the airport and it was felt that this is something that should be addressed in the IATA training curriculum. Also, mis-declared and undeclared DG are still a major concern for air cargo operators and members agreed that forwarders should be encouraged to give operational staff DG Awareness Training. [This is a requirement of the IATA, IMDG and ADR Regulations]

There was surprise and some disappointment voiced over the CAA’s decision to bring the Known Consignor audits in-house. There followed a discussion about the other benefits that Independent Auditors with Freight experience can bring, including the recognition of Dangerous Goods.

The meeting also discussed the importance of audit trails for Air Cargo during the delivery to Airlines or Handling Agents. Regardless of whether goods are under cover of a traditional paper AWB or an e-AWB, a delivery note should be signed to acknowledge receipt.

Agenda item 7 Any other Business

A brief discussion about the official enforcement of DG regulations in Nigeria (See Action Point below)

Date of next meeting

The next meeting is scheduled to be held on the 3rd September at Feltham

Action Points

AP1 Agenda item 7, Any other Business.

BIFA to provide details of the FIATA Dangerous Goods by Air Training Programme and whether training is available in Nigeria?