

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

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OTHER BUSINESS

Late proposals

Container/vehicle packing certificate (Section 5.4.2)

Transmitted by the International Council of Chemical Associations (ICCA)

Introduction

According to 5.4.2.1 the responsible for packing/loading of a container, which will be transported by sea, has to provide a “container/vehicle packing certificate”, confirming that the operation has been carried out in accordance with a number of conditions e.g.

- the container/vehicle is clean, dry and fit to receive goods,
- applicable segregation requirements have been observed,
- only sound packages have been loaded,
- all goods have been properly loaded and secured,
- the container/vehicle and packages are properly marked, labelled and placarded,
- a dangerous goods transport document, as indicated in 5.4.1.1, has been received for each dangerous goods consignments loaded in the container/vehicle

If the information, required in the dangerous goods transport document and the container/vehicle packing certificate, is incorporated into a single document, 5.4.2.2 requires that the document includes a **signed** declaration such as “It is declared that the packing of the goods into the container/vehicle has been carried out in accordance with the applicable provisions”.

This wording can be interpreted as that a printing of the name of the person responsible for the loading and stowing is not sufficient and that a manual signature is required. Even a facsimile print of the signature can not be considered as an alternative. Such a strict interpretation has led to practical obstacles in intermodal transport operations.

It is therefore proposed to adopt identical provisions for certification as is currently already the case for the dangerous goods declaration in 5.4.1.6.

Proposal

Add a new sentence at the end of 5.4.2.2:

“Facsimile signatures are acceptable where applicable laws and regulations recognize the legal validity of facsimile signatures”.

Add a new subsection 5.4.2.3:

“If the dangerous goods documentation is presented to the carrier by means of electronic data processing (EDP) or electronic data interchange (EDI) transmission techniques, the signature(s) may be replaced by the name(s) (in capitals) of the person authorized to sign.”

Justification

Modern supply chain processes in industry and logistics processes as well are using an integrated division of tasks supported by highly developed IT-structures. Loading facilities are often far away from the dispatch offices where the driver gets his shipping papers. The requirement for a physical signature in shipping documents is not in line with modern shipment processes and means a big burden for the consignor. The electronically printed indication of the name of the person authorized to sign and the date as well would simplify and accelerate the shipment process. Safety will not be reduced by this amendment, as the proposed changes are in line with identical provisions in 5.4.1.6 for the dangerous goods declaration.
