

Port Safety and Security Committee

Report of IAPH Survey Results
on
Overweight or Incorrectly Declared Container
Issues in Ports



International Association of Ports & Harbors (IAPH)

May 2012

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Foreword

Overweight containers or incorrect declarations of container weights create serious safety issues for the entire logistics chain, including shipping companies, stevedores, road and rail operators and road infrastructure owners.

Implications include incorrect vessel stowage arrangements, overloaded container handling equipment, truck accidents due to overloaded truck axles impacting stopping distances and damage to roads.

In May 2011 the IAPH adopted a resolution urging international organizations, including the International Maritime Organization (IMO), to adopt requirements for shippers or their agents to declare and document cargo correctly including weighing containers at origin.

In January/February 2012 the IAPH Port Safety and Security Committee sponsored a survey of members to ascertain the current measures in place for managing overweight containers or incorrectly declared container weights as well as seeking feedback on possible actions that could be taken to improve the situation in order to assist the IAPH Executive in refining the Association's position on this issue,

The results of the survey are provided to members herein.

On behalf of the Port Safety and Security Committee I would like to thank all the member ports and associated terminals that responded to the survey on this important safety issue.

May 2012



Shane Hobday

Chair of IAPH Port Safety and Security Committee

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Report of IAPH Survey Results on Over-weight or Incorrectly Declared Container Issues in Ports

Executive Summary

1. Introduction

In May 2011 at the Busan Conference, the IAPH adopted a resolution on “The Safety of Containers in the Supply Chain” in recognition of the serious risks of over-weight or incorrectly declared containers on safe intermodal transportation. The resolution urges international organizations including the International Maritime Organization (IMO) to adopt requirements for shippers to declare and document cargo correctly with actual weighing at origin.

In December 2011, the IAPH along with other associations of maritime carriers namely the World Shipping Council (WSC), the International Chamber of shipping (ICS), and BIMCO, made a press release to encourage the IMO to amend its rule so that it requires shippers to declare the actual weight of containers before loading. Within the IMO the issue is scheduled to be discussed in the next session of the sub-committee on Dangerous Goods, Solid Cargoes and Containers (DSC 17) in September 2012.

In January 2012, the IAPH Port Safety and Security Committee decided to carry out a survey to monitor current measures taken by world ports and terminals to tackle this issue and also to collect their opinions on possible IMO’s actions of amending relevant rules.

A total of 74 responses were collected from our member ports and their relevant terminals in 25 countries with detailed information on current procedures to address over-weight or incorrectly declared container issues in their ports and terminals. Main respondents are ports and terminals in the European and Asian regions, which account for 32 % and 48% of total responses respectively. Answers from the Netherlands and Japan were especially high with 9 and 14 responses, respectively. The data regarding respondents is analyzed in detail, which can be found in this report as “I. Analysis of Respondents”.

A list of Respondents is also included in the Appendix as Table 1.

2. Survey Questionnaires

Survey questionnaires are categorized into the following 7 items.

- 1) Risks due to Over-weight or Incorrectly Declared Containers (Q1)
- 2) Current Measures taken by Ports or Terminals to address the Risks (Q2)
- 3) Scaling Container Weight in Terminal (Q3)

- 4) Taking Verified Weight Certificate (Q4)
- 5) Future Plan to address the Issues (Q5-1)
- 6) Problems arising from Compulsory Scaling Containers in Terminal (Q5-2)
- 7) Views or Opinions on possible IMO New Rules (Q6)

A form of the survey questionnaires is attached in the Appendix of the report.

3. Results of Survey

Survey results of each field of questionnaires are summarized in brief as below.

1) Risks due to Over-weight or Incorrectly Declared Containers (Q1)

“Accidents in terminals” is their most (91% of total respondents) concerned risk caused by over-weight or incorrectly declared containers.

“Road traffic accidents” and “Difficulty making correct vessel stowage plan” are also regarded as high risk. (more than 60% each of total respondents)

2) Current Measures taken by Ports or Terminals to address the Risks (Q2)

“Scaling container weight” is the major step taken by 41 ports (55% of total respondents).

“Taking Verified Weight Certificate” is introduced by only 9 respondents (12%).

On the other hand, almost 30% of total respondents take no specific measures for the issues at present.

3) Scaling Container Weight in Terminal (Q3)

More detailed analyses on container scaling in ports or terminals are made as below.

i) Target containers for scaling (Q3-1)

<Scaling by Spot basis or Regular basis>

Among total 41 scaling ports, 27 ports (66% of scaling ports) replied as they made scaling on a regular basis.

Remaining 14 ports (34% of scaling ports) responded that they made weighing on a spot basis.

It means that only 36% of total 74 respondents (27/74) weighed containers on a regular basis at present.

Respondents from the America region show high implementation ratio (89%) of regular scaling, while ports in other regions make regular scaling at around a 30% ratio.

<Export containers or Import containers>

Export containers are the most popular containers scaled regularly by 24 ports (59% of scaling ports or 32% of total respondents).

Import containers are scaled regularly by only 12 ports (29% of scaling ports or 16% of total respondents).

ii) Scaling places and needed time for scaling (Q3-2)

<Scaling Places>

Scaling at terminal gate is most popular with 30 ports responses, which shares 73% of scaling ports or 41% of total respondents.

Scaling at other places in terminals or by cargo equipment are minor cases in current container operations getting only 11 (27% of scaling ports) and 8 (20%) respondents respectively.

America region also shows high ratio of using terminal gate for scaling, in particular all respondents of USA answer that they use terminal gate for scaling.

<Needed Time for Scaling>

In general, scaling at terminal gate requires only a short time around a minute per unit while scaling at other place in terminal needs far longer time as around 10 minutes per unit.

iii) Who bears the cost of scaling (Q3-3)

Under current terminal operation, terminal operator seems to be the party who bears the scaling cost most with 20 respondents (49% of scaling ports). Shipper or consignee is the next party to pay the expense most with 17 respondents (41%).

iv) Law enforcement for scaling (Q3-4)

Law enforcements for container scaling are shown in only 9 ports (12% of total or 22% of scaling ports).

It means remaining 29 scaling ports(more than70% of scaling ports) are practicing weighing containers without law enforcements.

*<Ports in USA are regarded under law enforcement of scaling exporting containers in spite of negative responses from USA ports>

4) Taking Verified Weight Certificate (Q4)

In response to Q2 (Current Measures taken by ports to address overweight containers), only 9 respondents (12% of total respondents) use Verified Weight Certificate as a measure to address the issue. Compulsory requirement of taking Weight Certificate is also implemented in only 4 ports (5% of total respondents).

When containers arrive at terminal without weight certificate, 4 ports (44% of 9 respondents of taking weight certificates) replied to refuse receiving containers for loading. Weighing containers in terminals is the measures responded by 3 ports (33%).

5) Future Plan to address the Issues (Q5-1)

Among 22 ports or terminals which answered that they do not have specific measures at present,

only 8 ports (36% of ports having no specific measures) intend to introduce some measures in future. Scaling and taking Weight Certificate are responded as future measures to be taken by 4 respondents each. It means that remaining 59% of respondents with no measures at present have no intentions to introduce new measures in the future.

6) Problems arising from Compulsory Scaling Containers in Terminal (Q5-2)

As the questionnaire was originally intended to get answers from ports having no specific measures for the issues at present (total 22 ports), the number of responses is less than 24.

Survey reveals that “difficulty of cost recovery” (17 ports or 71% of such ports) and “reduction of operational efficiency” (15 ports or 63%) are the most concerning issues for respondents. “Space, cost and time for installation of scaling facilities” are also regarded as significant concerns getting 12 responses (50%).

7) Views or Opinions on possible IMO New Rules (Q6)

Opinions or comments made by ports and terminals on possible IMO actions are summarized as below.

i) Mandatory requirement for shipper to submit Verified Weight Certificate

In general, overwhelming majority (85% of commented parties) shows support for introducing mandatory submission of weight certificate from shipper for loading containers.

On the other hand, there are concerns on possible burdens on terminal operation by introducing this weight certificate scheme, such as additional clerical work associated with taking certificates and checking correctness of their figures. Some comments propose to utilize EDI or other form of automated data exchange to alleviate the possible increase in staffing.

Other comments pointed out that the weight certificate must be authorized by relevant government body or licensed authority in order to secure the credibility of the figure.

ii) How to cope with containers without a weight- certificate

a) Refusal of receiving containers for loading when Verified Weight Certificate is not submitted

About 30% of responding ports regard this measure as their acceptable option for non-compliant shippers.

They consider that the shipper should have fair consequences of their faults or non-fulfillment of their duties.

b) Scaling Container in Terminal when Verified Weight Certificate is not Submitted

Almost half of the respondents (46% of responding ports) are of the opinion that scaling container in terminal as preferred steps for coping non-compliance containers. This option is especially supported by ports in Asia region(57%). They also claim due share of costs incurred to be paid by relevant shippers.

On the other hand, a considerable number of ports (46% of responding ports) oppose scaling in terminal as the measure as it requires the terminal operator to invest in scaling facilities in terminals. They also point out safety risk of transportation of mis-declared containers while they are carried from shippers' facilities to loading terminals.



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