

MODEL LETTER

Dear Minister

Re: Implementation of global standards on container safety

I am writing to you as an affiliate of the International Transport Workers' Federation (ITF), representing over 4.5 million transport workers across the globe. As an organisation, the ITF has been lobbying for nearly a decade with partners in the maritime and road transport industries to improve safety standards around container packing and transportation.

Many accidents in the transport sector are attributed to poor practices in relation to packing of containers, including for example, inadequate securing of cargo, overloading, fumigation and misdeclaration of contents. As an affiliate of the ITF, we are therefore deeply concerned that a failure to address container safety is damaging to workers, the general public and the transportation industry as a whole. Containers are by far the most common means of transporting goods throughout the world and we call on you and your government to join the effort to ensure that this passage is safe for all those who come into contact with them.

At a global level, there has been some movement on these issues with the development of guidelines on packing of containers through the adoption in 2014 of a Code of Practice on Packing of Cargo Transport Units by the International Labour Organisation (ILO), International Maritime Organisation (IMO) and United Nations Economic Commission for Europe (UNECE). The IMO Safety Committee has also recently approved amendments to the Safety of Life at Sea convention (SOLAS) that will introduce a mandatory requirement for the certification of container weights prior to loading on board an export vessel.

Given the serious nature of container safety and its impact, as well as developments at a global level to regulate the packing, weighing and checking of containers, we ask the government to make a public commitment to the regulation of container packing and transportation and to take action to improve safety standards.

We urge you to:

- 1) Open a discussion in parliament on this issue to confirm your support for the ITF position;
- 2) Endorse and take steps to implement the global recommendations by the ILO, IMO and UNECE on container safety;
- 3) Adopt the provisions of the ILO/IMO/UNECE Code of Practice on Packing of Cargo Transport Units into national legislation;
- 4) Adopt national 'chain of responsibility' regulations which extend the general responsibility and legal liability for ensuring that the container is safe along the transport chain to the consignors, packers, loaders and most importantly the clients, rather than pursuing the truck drivers and operators.

By doing so, you will be supporting a safer, more healthy and productive transportation industry across the supply chain.

We are looking forward to working with you to address these issues.

Yours faithfully,