



The Hong Kong
Shippers'
Council
香港付貨人委員會



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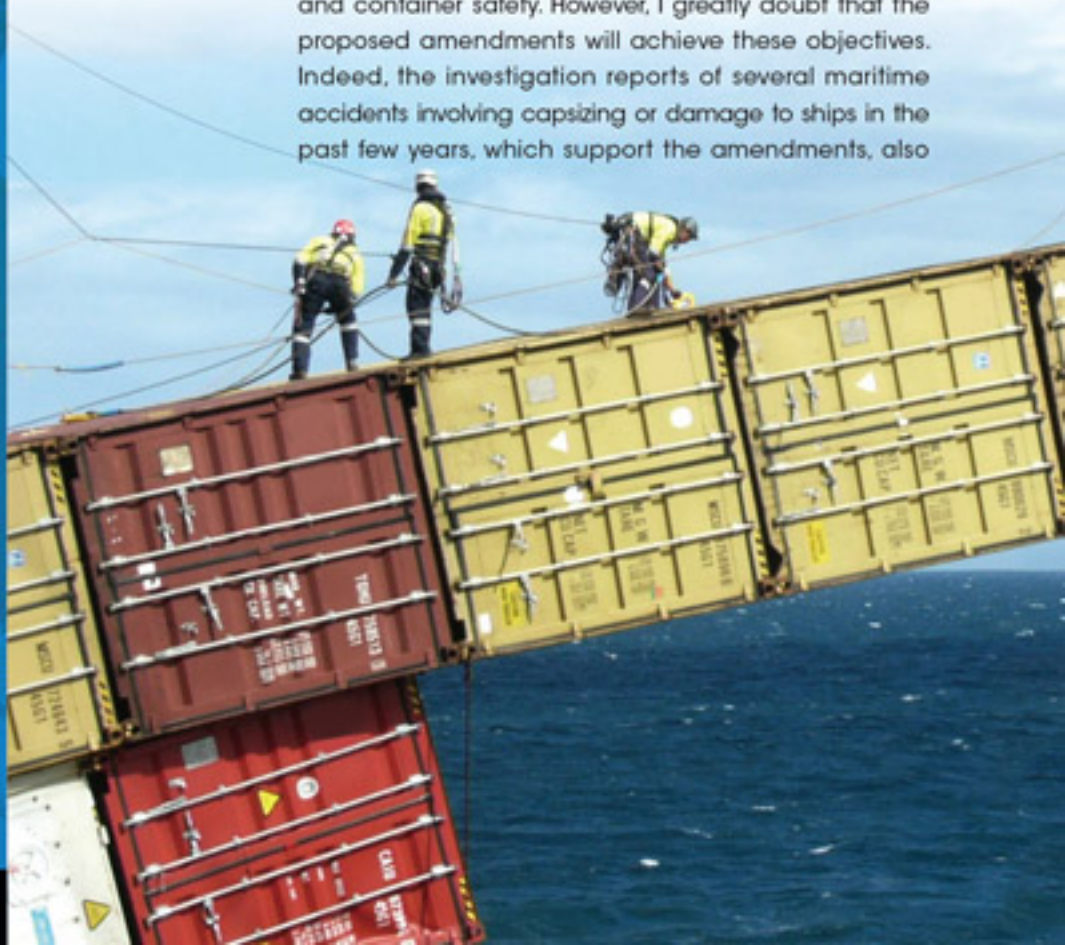
Container

Shippers should pay attention to the possible impact if the proposed amendments to the International Convention for the Safety of Life at Sea (SOLAS) are adopted by the International Maritime Organisation (IMO) in May 2014.

The proposed amendments have already been accepted by the IMO Sub-Committee on Dangerous Goods, Solid Cargoes and Containers in its meeting in September 2013 and will be put forward to the IMO Maritime Safety Committee for final approval.

The amendments require shippers to establish and declare weight of a laden container to shipping lines and terminals by weighing the packed container using calibrated and certified equipment, or using a certified method, weighing all packages and cargo items in the container and add the tare weight of the container for the total weight.

I, of course, support initiatives that enhance maritime and container safety. However, I greatly doubt that the proposed amendments will achieve these objectives. Indeed, the investigation reports of several maritime accidents involving capsizing or damage to ships in the past few years, which support the amendments, also



weight debate heats up

stipulated that a large percentage of containers onboard were stowed not in accordance with the stowage plans.

Furthermore, shipping lines often use cargo data submitted during the booking stage instead of the more accurate final cargo data for stowage planning. Inadequate and improper lashing of containers onboard were mentioned, too. From other sources, there were comments on the maintenance and operations of the ships involved.

Regarding the overturn of containers, more often than not, they are due to improper loading and lashing of cargo in the containers, instead of wrong or false declaration of cargo weight. Leaving out all these critical issues and focusing only on cargo weight declaration will not help to achieve the needed maritime and container safety.

I also cannot approve the concept behind the amendments. The overwhelming majority of shippers have been properly declaring

the cargo weight. The amendments have ignored this fact and requested every shipper to prove himself clean. We ought to understand that for every additional measure introduced there is a price tag and this sort of indiscriminating approach is both ineffective and costly. We should take an approach that is based on risk assessment, with penalties big enough to deter any attempt of violation.

We should also be concerned about how we can comply with the proposed requirements. There are simply inadequate facilities capable of weighing laden containers in Hong Kong. Moreover, most of the ground scales are located in the container depots that close at 5pm and usually do not open on Sundays. Shippers also worry about the charges, which are basically unregulated.

For those containers carried by trucks to Hong Kong, the gross weight of the truck and the laden containers should have been captured by the Mainland authorities through the ground scales located at the boundary crossing points. Could this data be used? A database of the trucks and chassis should be easily available as both are licensed by the authorities.

Therefore, it is just a matter of whether the container weight data captured at the boundary by the Mainland authority is available and how the SAR authorities and the industry make use of this data, as part of the regulatory scheme.

While the issue of adequacy of the weighing facilities must be tackled, I believe most shippers will rely more on weighing the individual packages to come up with the total container mass. A main concern over here would be what constitutes a "certified" process for establishing the weight? What the industry does not need is certification by a neutral third party, a practice that is both inefficient and extremely expensive.

Whatever approach shippers decide to adopt, we need a reasonable tolerance margin that needs to be set carefully.

I urge the SAR Government to consult the trade, and particularly shippers who have been made the prime target group in the new regulatory regime. Our comments should be fully conveyed to IMO. There remains a lot more work to do regarding enhancing maritime and container safety.

