



HSE Guide

Safety and Security Checks for Containers

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1. Overview

The purpose of this HSE Guide is to define the safety and security checks that are necessary for the safe and secure transport of Syngenta products in containers. These checks will:

- Ensure that containers used to transport Syngenta products are fit for purpose and can be loaded safely
- Ensure compliance with the IMDG code
- Ensure that containers used to transport Syngenta products are not used to smuggle illegal contraband
- Ensure that containers carrying Syngenta products are protected against tampering.
- Protect Syngenta's registrations under C-TPAT and similar Approved Economic Operator schemes. Membership of these schemes gives Syngenta shipments preferential status when passing through customs which reduces the administrative burden and helps to ensure a reliable supply chain.
- Enable intervention where the transport does not comply with these regulations or where it puts safety, security or the environment at risk.

This HSE Guide applies to the carriage of Syngenta products, raw materials, etc., in containers when the transport is managed by Syngenta

All Syngenta sites, toll manufactures and suppliers who load or unload containers where the transport is managed by Syngenta

All Syngenta personnel who establish or manage contracts with 3rd party logistics service providers that involve the carriage of materials in containers.

2. Definitions

Term	Definition
C-TPAT	Customs-Trade Partnership against Terrorism. A US program that seeks to increase security for goods that cross borders when crossing borders whilst facilitating trade. There are similar programs, called Approved Economic Operator, in other countries
Dangerous Goods	Goods that have certain hazards that are defined in the Dangerous Goods regulations applicable to the mode of transport e.g. IMDG code
Container	Often known as "Dry boxes" or "Cargo Transport Units (CTUs)", these are steel boxes that are designed to allow goods to be transported using different modes of transport without unloading the goods. For international transport, the dimensions conform to ISO 668 but other sizes are available for use within regions. The most common sizes are the 20 foot and 40 foot container. Includes refrigerated containers (reefers) as well as containers designed for ambient temperature

High Security Seal	A seal, complying with the current edition of ISO 17712, that is intended to indicate if the load has been tampered with during its journey. Typically these are metal wire or bolt seals which are designed so that they cannot be opened without damaging the seals. This ensures that any tampering with the cargo is visible.
IMDG Code	International Maritime Dangerous Goods Code. An international agreement that covers the transport of dangerous goods by sea

3. Roles and responsibilities

Role	Responsibility
Syngenta site managers or toll manufacturers	Locations who load containers must establish processes that implement the following controls: • “7 point check” • Use of high security seals Locations who unload containers must establish processes that implement the following control: Use of high security seals
Procurement	Ensure that suppliers who load containers that will be carried under a Syngenta contract establish processes that implement the following controls: • “7 point check” • Use of high security seals
Logistics procurement	Ensure that Logistics Service Providers know that they must report seal related discrepancies or anomalies to Syngenta

4. Guidance

4.1. Legal Requirements

Containers intended to carry Syngenta goods must be inspected before they are loaded. Containers must be sealed with high security seals.³

4.2. Risks and Controls

Typical risks associated with the use of Containers are:

- Cargo is tampered with after it has been loaded into the container
- Inadequate security procedures results in loss of C-TPAT or AEO membership. This may result in increased administrative burdens (financial guarantees etc.) and potential delays to Syngenta shipments due to increased inspection when passing through customs.
- Floor collapses while loading the container, risking injury to the fork lift truck operator
- Cargo is damaged by water getting into the container
- Cargo is damaged by contact with the container
- Container is used to smuggle illegal materials

These risks are controlled by:

- Carrying out a 7 point check before loading the container (see chapter 4.3)
- Sealing the container using high security seals (see chapter 4.4)

All locations who load containers must establish documented procedures to implement the following controls and train involved personnel accordingly:

- 7 point check
- Use of high security seals

All locations who unload containers must establish documented procedures to implement the following control:

- Verify integrity of high security seals

Detailed requirements for each of these key controls are defined in the following sections.

4.3. The 7 point check

A process must be in place to ensure that containers are systematically inspected using a "7-point check" before loading, to confirm they are suitable.	Requirement LOG.16
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This applies to shipping containers, also known as dry-box containers, intermodal containers or Cargo Transport Units (CTUs).

The "7-point check" covers:

1. Outside / undercarriage
2. Inside / outside doors
3. and 4. Right / left sides
5. Front wall
6. Ceiling / roof
7. Floor

The check will ensure that there are no modifications to the container that could be used to smuggle contraband.

Records of the 7 point check must be kept for at least 12 months (or longer if local laws require).

For a detailed description of the 7 point check refer to Appendix 1.

The following supporting documents is available

- Form "Pre-trip inspection checklist for containers"

A thumbnail image of a form titled "Pre-trip inspection checklist for containers". The form is organized into sections with checkboxes for various inspection points, including "Outside / undercarriage", "Inside / outside doors", "Right / left sides", "Front wall", "Ceiling / roof", and "Floor". It also includes fields for "Inspector", "Date", and "Time".

4.4. Use of high security seals

Tank containers and dry box containers must be sealed with high security seals before leaving the loading location.	Requirement LOG.23
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Requirements for high security seals are given by the Customs-Trade Partnership against Terrorism (C-TPAT) in the US and other “Approved Economic Operator” (AEO) schemes. By being a member of these Syngenta has agreed to meet the following requirements

- High security seals must comply with an external standard – ISO 17712.
A high security seal is one that cannot be opened without damaging the seal. An opened seal cannot be refastened. This means that the receiver of a sealed container will be able to see if the seals have been opened
- Seals are individually numbered.
This means that the receiver of a sealed container will be able to confirm that the seals have not been changed during the journey.
- Access and use of high security seals must be controlled
- High security seals should be locked up before use.
- Only authorized personnel may handle seals
- Written records of seals that are purchased and used must be kept.
- High security seals must be issued randomly to ensure that people tampering our containers cannot predict the serial numbers.
- The high security seal number(s) must be recorded on the shipping documents.
This is the most important step. You’ve taken steps to make it very difficult to replace the seal with another one. It’s difficult to open the seal without it being visible. By recording the seal number on the shipping document, you allow the receiving site to confirm that the seal on the container when they receive it is the one that you applied.

Appendix 1: 7 Point Check of Containers



1. Outside/undercarriage

- Check that support beams are undamaged
- Solid plates should not cover the beams



2. Inside/outside doors

- Check that locking bars and mechanisms are intact, in good working order, are not damaged and cannot be easily removed or tampered with.
- Check especially for loose bolts, plates and repairs or different color bonding materials
- Check that doors seal completely when closed (stand inside and look for light around the door)
- Check that the ribs on the inside of each door are visible: solid plates should not cover standard container cavities.

3. & 4. Right/Left sides

- Check for unusual repairs to structural beams
- Check that there are no holes or cracks in the walls.
- Check that repairs to the inside of the container are visible on the outside (repairs visible only on the inside could indicate a hidden compartment)
- Use a tool to tap the side walls. Check for a hollow, metal sound.
- Check that there are no sharp edges or protrusions that could damage the cargo



5. Front wall

- Check that blocks and vents are visible.
- Check that there are no holes or cracks in the wall.
- Use a tool to tap the side walls. Check for a hollow, metal sound.
- Check that the dimensions of the container are correct (if dimensions are less than expected, this could indicate a hidden compartment). If in doubt, use a range finder, measuring tape or string to measure them.
- Check that there are no sharp edges or protrusions that could damage the cargo.



6. Ceiling/roof

- Check for unusual repairs to structural beams
- Check that there are no holes or cracks in the walls.
- Check that repairs to the inside of the container are visible on the outside (repairs visible only on the inside could indicate a hidden compartment)
- Use a tool to tap the side walls. Check for a hollow, metal sound.



7. Floor

- Check for any unusual repairs
- Check that floors are flat – there should be no steps in the floor
- Check that the floor is not damaged. There should be no protrusions, such as nails, that could damage the cargo
- Check that the height of the container is correct (if height is less than expected, this could indicate a hidden compartment). If in doubt, use a range finder, measuring tape or string to measure them.



Compliance

All containers must comply with the "International Convention for Safe Containers" (CSC).

Check that the next test date, marked on the CSC plate, has not been exceeded

OR

Check that the CSC plate contains registration information for "Approved Continuous Examination Program (ACEP)"



General

- Check that the inside of the container is dry and free from condensation: condensation on the walls may stop Ty-Gard from sticking correctly. Large amounts of condensation may leak from the container and give the impression that the cargo is leaking.
- Check that all labels from the previous load have been removed. If any are present, they must be removed
- Check that the inside of the container is clean, free from cargo residues and has no persistent odor

Pre-trip inspection checklist for freight containers

~~For the transport of chemicals including dangerous goods.~~

For goods not classified according to national and/or international regulations, paragraphs 2.1, 2.2, 3.2 and 3.3 are not relevant. In the event of language problems, this check-list should be made out as best as possible

1. Shipment Details	
Shipment Order Number	Final Destination
Product name(s)	Material/AGI code(s)
Quantity	
Vehicle Owner	
Vehicle Driver (First Name)	Vehicle Driver (Last Name)
Driver's valid ID	
Vehicle Registration	Trailer Number
Dry Container Number	
Rail-Car Number	Packing Group(s)
UN-Number(s)	Marine Pollutant: Yes ☐ No ☐
Primary Hazard(s)	Subsidiary Hazard(s)
Proper Shipping name(s)	

The Freight Container must not be loaded if it does not comply with all of the following requirements. It must also be reported via the Distribution safety incident/non-conformance reporting system.

2. Documentation	
2.1	Has the carrier provided the appropriate emergency instructions, as required by applicable legal requirements, national and international codes? Languages provided:
YES	☐ NO ☐
2.2	Are all the necessary transport documents available. - <u>د.ا</u> Dangerous Goods Declaration and Container Packing Certificate? Note: The collection order does not qualify as a Transport Document.
YES	☐ NO ☐

Records

Records of the 7 point check must be kept for at least 12 months (or longer if local laws require)

The checklist contained in annex I of this HSE Guide is recommended

Summary Sheet	
Title	75_68_01 GD_Safety and Security Checks for Containers_v1.0
Scope	Global
Version no.	1
Current version date	22 nd Mar 2018
Original version	22 nd Mar 2018
Revision history	N/A First Publication
Approved by	Head of Safety
Contact information	global.hse@syngenta.com
Further References	None



Syngenta Crop Protection AG
Global HSE
Schwarzwaldallee 215
P.O. Box
CH-4002 Basel
Switzerland

[HSE Website](#)