syngenta

Safety and Security Checks for Containers

Code of Practice 612

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1. Purpose

The purpose of this Code of Practice 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.

2. Definitions

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. Scope

The carriage of Syngenta products, raw materials[1] 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.

4. Accountabilities and responsibilities

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

5. Mandatory principles or standards

5.1 Legal

Containers intended to carry Syngenta goods must be inspected before they are loaded[2,3]. Containers must be sealed with high security seals[3]

5.2 Implementation requirements

All locations who load containers must establish documented procedures to implement the following controls:

- 7 point check
- Use of high security seals

[1] This includes products, raw materials etc. that are not classified as Dangerous Goods and those that are classified as Dangerous Goods.
[2] IMDG code section 7.3.3
[3] Security Criteria for C-TPAT Foreign Manufacturers. Similar requirements exist in other "Approved Economic Operator" (AEO) schemes

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

- Use of high security seals

5.3 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:

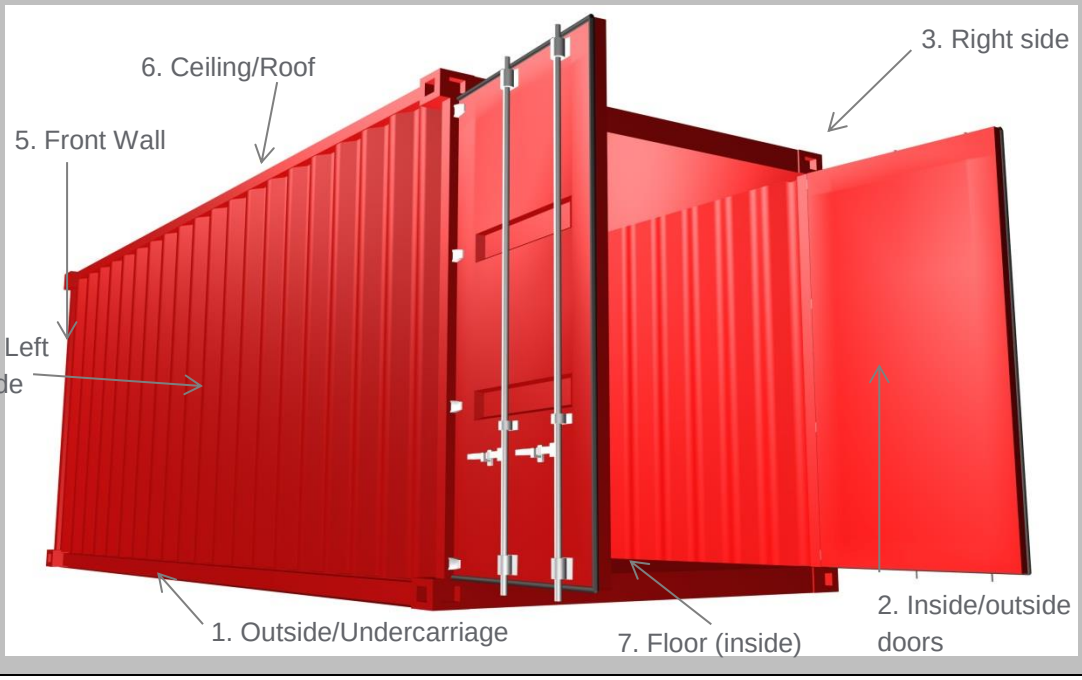
- Carrying out a 7 point check before loading the container (see 5.3.1)
- Sealing the container using high security seals (see 5.3.2)

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

5.3.1 "7 Point check"

Key Principle:

Before a Container is loaded, carry out a systematic check to ensure that the container is fit for loading and that there are no modifications to the container that could be used to smuggle contraband. This is known as the "7 point check".



Requirements

1. Outside/undercarriage

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

2. Inside/outside doors

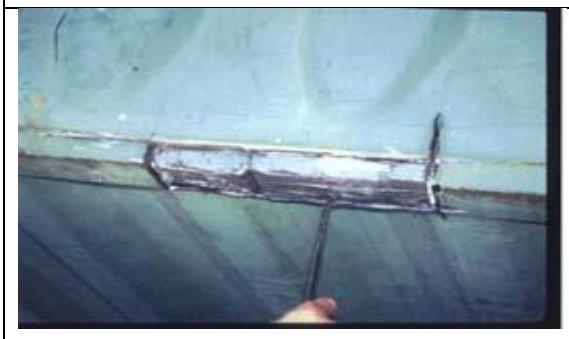
- Check that locking bars and mechanisms are intact, in good working order, are not damaged and cannot be easily removed or tampered with.
- Check especially for loose bolts, plates and repairs or different color bonding materials
- Check that doors seal completely when closed (stand inside and look 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?	YES ☐ NO ☐
	Languages provided:	
2.2	Are all the necessary transport documents available, - e.g. 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 CoP is recommended

5.3.2 Sealing the container using high security seals

Key Principle:

All containers must be sealed with high security seals. Their design and individual serial numbers means that any attempt to remove the seal will be apparent to the receiving location

Requirements

A typical high security bolt seal

- Facilities must seal all loaded containers with high security seals. These seals must comply with the current edition of ISO 17712
- Seals must only be attached by a designated person
- Access to seals must be strictly controlled and must be issued in random order. **Do not use seals in consecutive number order as this is a security weakness. People who intend to tamper with our goods may observe our traffic, and if they observe a numbering pattern this may help them to obtain a substitute seal.**
- Seals must be stored in a secure location (locked cabinet, safe etc.) prior to use
- A log must be maintained in order to account for all seals under the control of the loading site. Periodic inventories of seals and the seal use log must be conducted to ensure that all seals are accounted for
- All Bills of Lading, dangerous goods declarations or other transport documents (including electronic data transmissions) must be complete and include all seal numbers used for the container.

	• Facilities receiving loaded contains must check that the serial numbers of seals attached to the container match the serial numbers listed on the shipping documents. • Any discrepancy must be rectified before the container is accepted. • Logistics service providers must report any discrepancies or anomalies related to seal integrity to Syngenta

Appendix 1

Pre-trip inspection checklist for containers

For goods that are not classified as Dangerous Goods, paragraphs 2.1, 2.2, 3.2 and 4.3 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 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?	YES ☐ NO ☐
	Languages provided:	
2.2	Are all the necessary transport documents available, - e.g. Dangerous Goods Declaration and Container Packing Certificate? **<u>Note:</u> The collection order does not qualify as a Transport Document**.	YES ☐ NO ☐

3.	**Container Pre-loading**	
3.1	Container test date and CSC approval are valid and data plate legible	YES ☐ NO ☐
3.2	Inspect the physical integrity of the container No holes or cracks in walls or roof.	Good Condition
	▪Front Wall	YES ☐ NO ☐
	▪Left Side	YES ☐ NO ☐
	▪Right Side	YES ☐ NO ☐
	▪Floor No nails or other protrusions which could damage the cargo.	YES ☐ NO ☐
	▪Ceiling/Roof	YES ☐ NO ☐
	▪Inside/outside doors Doors operate properly Closing devices operate properly. Container is watertight. Test method: enter container, close both doors tightly and look for incoming light (e.g. through cracks, holes, door gaskets etc.).	YES ☐ NO ☐
	▪Outside/Undercarriage	YES ☐ NO ☐
3.3	Container interior is absolutely dry. (Wipe up any condensation or white frost in order to avoid corrosion and moisture damage of the cargo.)	YES ☐ NO ☐
3.4	All adhesive labels from the previous cargo have been removed, e.g. IMO placards.	YES ☐ NO ☐
3.3	Container is clean, free of cargo residues and has no perceivable odor.	YES ☐ NO ☐
4	**Container Post-loading Check**	
4.1	The container is packed appropriately for the cargo, anticipated transit stresses and the container.	YES ☐ NO ☐
4.2	A copy of the packing list is placed in a highly visible location inside the container (for Customs inspections and the like).	YES ☐ NO ☐
4.3	The doors and, if applicable, roof covering have been carefully closed.	YES ☐ NO ☐

	Have Primary and Subsidiary Hazard class placards been mounted on all four sides of the container? Has the UN number been mounted on all four sides of the means of transport? (In the center of the hazard class placard, or on an orange panel) Has a marine pollutant mark been mounted on all four sides of the means of transport (where required)? **All the above are required to be placed a minimum of 5 feet (1.5m) from the bottom of the Container.**		YES ☐ NO ☐ YES ☐ NO ☐ YES ☐ NO ☐
4.4	Only for goods that have been fumigated in the container: Has a completed, fumigation warning mark been applied to the container doors		YES ☐ NO ☐
4.5	Seal number(s) ☐ ☐ Container integrity must be maintained to protect against the introduction of unauthorized material and/or persons. At point of loading, procedures must be in place to properly seal and maintain the integrity of the shipping containers. A high security seal must be affixed to all loaded containers. All seals must meet or exceed the current ISO 17712 standards for high security seals.		
5.	**Packing**		
5.1	Packages checked for contamination prior to loading the vehicle **<u>Note:</u> If there is any contamination, stop and contact Syngenta**		YES ☐ NO ☐
5.2	Pallets checked for protruding nails, damaged boards, blocks or runners. All pallets must heat treated, and stamped with the heat treatment logo. Where pallets are used, containers must be wrapped or banded to the pallet. **<u>Note:</u> Only New sales pallets should be used**		YES ☐ NO ☐
5.3	Reusable Intermediate Bulk Containers (IBC's) Date of last inspection Note: If the date of the next inspection has	/ /	YES ☐ NO ☐

	passed, then the IBC cannot be loaded 		
6.	**Securing the Load**		
6.1	During Carriage Goods packages must be securely fastened to or contained within the transport unit to prevent lateral or longitudinal movement or impact, and to provide adequate external support. Ty-gard used : Heat treated wood blocking and bracing used :		YES ☐ NO ☐ YES ☐ NO ☐
7.	**Drivers Declaration**		
7.1	**I confirm that by signing this, I have received the total amount of goods in packages, and the load is not damaged in any way. I have received the correct documentation for the load.**		
7.2	Drivers Name (Please print)		
7.3	Drivers signature		
7.4	Date		
8.	**Shipping Location Representative**		
8.1	Name (Please print)		
8.2	Signature		
8.3	Date		

Remarks:

This Checklist only covers the requirements for Containers.

Any other additional checks referring to

- **Driver's training**
- **General vehicle checks**
- **Equipment checks**
- **Protection of Public and the Environment**

have to be added according to Regional and/or country specific requirements

Additional documents / dangerous goods declarations according to national legal requirements have to be handed over separately.

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