

 **VOHMA (Water Carriers)**  
**REMOVING INTERMODAL IMPEDIMENTS**  
 October 11, 2007 Washington, D.C.



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 **General Statements**

In an effort to bring clarity in responsibility and to foster positive initiatives for the intermodal transportation of hazardous materials / dangerous goods VOHMA would like to offer some general statements:

- In the modern global marketplace shippers expect to be able to distribute their newest products "en-masse" throughout the world virtually simultaneously following introduction to the market and to ensure the inventory will meet the perceived demand.
- The transportation logistics chain must provide a seamless integration of carriage by all modes with the greatest efficiency to meet the delivery schedules and financial constraints.
- Competitive world trade participants rely on a transportation infrastructure that minimizes obstacles that may result in delays or even barriers to intermodal transportation efficiency.
- Harmonization is a key element in eliminating obstacles between multiple geographies or even between modes within a single geography.

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 **General Statements**

- Differences in hazard communication or the interpretation of their application are a principle source of disharmony in intermodal/international transportation of dangerous goods.
- Documents required for dangerous goods transportation in each mode must provide uniformity in content and in general format in order to enhance harmonization in hazard communication throughout all modes.
- Electronic data interchange (EDI) has become a recognized method of efficient and accurate communication currently being used successfully throughout the industrialized world.
- The basic elements currently required for documents used for the purpose of hazard communication can readily be transmitted by existing EDI methods.

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### General Statements

- EDI transmissions permit immediate access to hazard communication information by all those involved in the transportation infrastructure as well as by emergency responders equipped with basic technology for receiving data in both electronic or hard copy reproduction.
- Intermodal transportation partners engaging in contractual agreements between modes or between interlining carriers within modes as a link in the intermodal transportation of containerized dangerous goods would benefit from clear, concise, authoritative regulations that provide specificity to responsibilities in the transfer of containers from one carrier to another within or between those modes

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### INTERMODAL CHALLENGES



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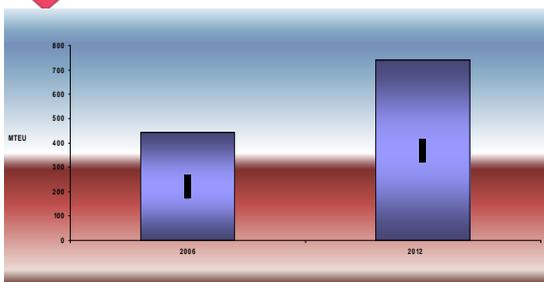
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### Worldwide Terminal Throughput



Almost 1000 TEU increase per week  
Congestion is estimated to cost 200 billion per year (Fairplay article)

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## INTERMODAL CHALLENGES

### US DOT – Challenges

- **Offeror status of interlining carriers if we 're-create' documentation**
  - Interlining carriers may create documentation for 'its own use'; but if for connecting carrier is the interlining carrier considered an offeror ?
  - Certification is a 'pre-transportation' function
- **Interlining carriers cited as shipper or Offeror for rail violations**
  - Wrong emergency response numbers, blocking/bracing etc
- **Emergency response telephone number 'disconnect' with responsible parties**
  - Often connection is lost when third party numbers are used
- **Use of EDI and ELECTRONIC transfer – regulatory clarity need**

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## INTERMODAL CHALLENGES

### IMDG Code – Challenges

- **Packaging and weight requirements**
    - Different interpretations lead to frustrated shipments
  - **Documentation requirements for:**
    - Temporary storage of import containers on marine terminals
    - Interlining and / or vessel sharing partners
- Do we really need 100's of individual documents to discharge a vessel ?
- Do we really need to exchange 100's of copies of original documents for interlining and / or vessel sharing partners ?

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## WHERE DO WE GO FROM HERE ?

### NEEDED:

- Updated documentation requirements to facilitate the smooth transfer of goods
- Clear intermodal documentation regulatory requirements without misdirecting responsibility or liability
- EDI and ELECTRONIC transfer of information – Define data elements
- Address certification requirements for interlining carriers

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## SUGGESTIONS

### DOT

- Clarify Offeror status does not apply to carriers when creating documentation for interlining carriers
- Clarify certification requirement for interlining carriers
  - Not required
  - OR
  - Replaced with a statement 'certification on file with (insert carrier name)
- Clarify rail documentation:
  - Consist / way bill to include shippers (offerors) name; not the interlining carriers name
  - OR
  - Update FRA inspector training to clarify that internal rail documents should not be used for citations
- Update emergency response requirements to include requirement to show Offeror (or underlying E.R. contract party) in association with E.R. number
- Allow EDI and ELECTRONIC transfer of information – This means:
  - Full EDI transfer of information between all parties
  - Transfer of hard copy documentation information into carrier's system for subsequent EDI to interlining carriers and/or creation of new documentation from carrier's system for transfer of information to interlining carriers

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## SUGGESTIONS

### IMDG Code

- Clarify No. and type of outer packages and gross weight only is required (nec for class 1)
- Recognize DG list as covering documentation for inbound shipments while temporarily stored on Marine Terminals
- Consider alternatives to individual origin documents for interlining vessel transports
- Consider alternatives to certification requirements for interlining carriers

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