Update on Delay and Denial of Shipment

Ulric Schwela
Chair of the International Steering Committee on Denial of Shipment

TRANSSC 23
Vienna, 24th-28th October 2011
Contents

- Definition of Delay and Denial
- ISCDOS
  - Structure, Management Team
  - Action Plan
  - Meetings from TRANSSC 22 to 24
- Way Forward
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Materials Affected by D/D

- All Radioactive Materials:
  - Radiopharmaceuticals, carried by air
  - Cobalt-60, carried by sea
  - Molybdenum-99, carried by air
  - Tantalum raw materials, carried by sea
  - Uranium yellowcake, carried by sea
  - Other sources for teletherapy or industrial use
A Comprehensive Regulatory Framework

Road, Rail and Inland Waterway

All classes, all modes

Sea

All 9 classes, all modes

Air

Class 7, all modes

24th-28th October 2011
Delay and Denial of Shipment

- Each country implements the TS-R-1 regulations – often with additional regulations

- Regulatory disharmony results in carriers denying shipment

  - Major carrier official statement: “…in principle not opposed to carrying….radioactive cargo” and “…will consider carriage….provided….transit restrictions are lifted…”

24th-28th October 2011
Tantalite mines: in operation

Tantalite mines: uneconomical or undeveloped deposits

Tantalum transport requirement

Tin slag: from tin smelting

Processing: extraction of tantalum

Source: T.I.C. estimate 12-Oct-2010, tantalite and tin slag size by most likely resource base
What is a delay/denial – when and...

- A refusal (explicit or implicit) to carry a shipment of radioactive material though it conforms to all the applicable Regulations
- Includes where physical capability exists, but those involved refuse to accept a product
- Does NOT include where physical capability to handle product is not in place


\[ \text{...where} \]

- Denial Ports termed “Hot Spots”
- Every negative factor affects sustainability

\[ \rightarrow \text{some shipments are impossible for years} \]
‘Who cares?’ – The impact of a delay or denial
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ISCDOS Formation

- 2003-Jul: IAEA Transport Conference
- 2006-May: meeting on delay and denial
- 2006-Nov: ISC 1, Initial Membership:
  - IAEA, ICAO, IMO
  - IATA, ICHCA, IFALPA (ACI, IAPH, WTO)
  - IAEA Member States
  - Transport – Edlow International; Isotopes – ISSPA
  - Industrial ores – T.I.C.; Nuclear industry – WNTI

Encourage carrier membership – key player
ISCDOS Organisational Structure

FACILITATION

Management Team

Regional co-ordinators

National Focal points

GROUP

ISC

Regional Network

National committee

24th-28th October 2011
ISCDOS Organisational Structure

- Management Team oversees networks via:
  - RCs; NFPs; Modal Organisations; transport industry

24th-28th October 2011
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Action Plan

- Six thematic areas
  - Awareness
  - Communication
  - Economic
  - Harmonisation
  - Lobbying
  - Training

- Task Tracking
  - Ongoing
  - To be completed
  - Completed
  - **Regional AP**
    - Led by RC
  - **National AP**
    - Led by NFP

24th-28th October 2011
### Awareness – Database

**IAEA / ICAO / IMO**

- 225+ reports; analysis 2011-Jul for air and sea
- Since 2009, 182 reports, 94 maritime:
  - 92 denials
  - 76 for $^{60}$Co
  - 56 due to carrier unwillingness to transport

### Details of Difficulty

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<td>Date of difficulty</td>
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<tr>
<td>Name of entity with whom the alleged difficulty</td>
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<td>Location(s) and date(s) of transit</td>
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<td>Destination</td>
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<tr>
<td>Brief description of events</td>
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<tr>
<td>Reasons stated for difficulty of carriage</td>
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<td>Actions taken to resolve the matter (if any)</td>
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<td>Consequences of the development(s)</td>
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<td>Other relevant information or comments</td>
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<td>Suggestions (if any)</td>
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### Details of Contact

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1 Name of Member Government’s Civil Aviation, Maritime Administration or other Government Organisation or Non-Governmental Organization with consultative status, Manufacturer/Producer/Shipper submitting the Report.
Welcome to GISIS

Maritime Security
Information communicated under the provisions of SOLAS regulation XI-2/13 (SOLAS chapter X1-2 and the ISPS Code).

Recognized Organizations
Information submitted by Member States under MSC/Circ.1010-MEPC/Circ.382.

Port Reception Facilities
Data on the available port reception facilities for the reception of ship-generated waste.

Piracy and Armed Robbery
Reported incidents of piracy and armed robbery.

Condition Assessment Scheme
Electronic database for the implementation of the Condition Assessment Scheme - Resolution MEPC.94 (46), as amended.

Marine Casualties and Incidents
Data on marine casualties and incidents, as defined by circulars MSC-MEPC.3/Circ.3.

Pollution Prevention Equipment
Pollution prevention equipment required by MARPOL 73/78.

Simulators
Information on simulators available for use in maritime training.

Greenhouse Gas Emissions

IMDG Code
Reported cases of disparities between versions of the IMDG Code.

http://gisis.imo.org/Public/
Awareness – Conferences

- NORM
  - 2009, 2010 Dresden
  - 2010 Marrakech
  - 2011 Hasselt
  - 2012 Tallinn

- PATRAM
  - 2004 Berlin
  - 2007 Miami
  - 2010 London

- 2013 San Francisco

- RAM Transport
  - 2006 London
  - 2009 Manchester
  - 2011 Vienna
  - 2012 London

- Industry meetings
  - CINS, ISSPA, T.I.C., WNA, WNTI

24th-28th October 2011
Communication – Strategy

Key Messages:
- Exemplary Safety Record; 50 years of RAMT Regulations

Strategy Action Plan
- Actions postponed by Fukushima
- Brochure completed
- Fact sheets, tool kits
Communication – Strategy

- Strategy Action Plan continued…
  - PROTRAM
  - Video development
    - Iran: public information
    - Transport Safety film
    - Plans for extension to: $^{60}\text{Co}$; tantalum raw materials
  - Website
    - http://goto.iaea.org/denialofshipment/
- Challenging inaccurate trade journal articles

24th-28th October 2011
Harmonisation

- IATA list of variations
  - 240 variations directly/indirectly affecting Class 7

- ICAO Technical Instructions
  - 156 variations directly/indirectly affecting Class 7

- IMO
  - Requires proposal to FAL committee to compile this

Better to have some information than none – consignors need an initial central source

Member States encouraged to advise IAEA of additional regulations and/or variations
Lobbying – Successes

- Long Beach, CA, USA
  - Expected to lift Class 7 restriction soon

- South Africa
  - Edlow International obtained transit licence for uranium yellowcake
  - Planning to obtain transhipment licence

24th-28th October 2011
Training

- Member State hosted training
  - Brazil, Cuba – National Networks
  - Malaysia, Philippines – workshops
    - Industry
    - Senior port authority staff
    - Stevedore and warehouse line managers
- IAEA Technical Cooperation training
  - Panama; more planned
- Industry led training
  - WNTI workshop in Namibia
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24th-28th October 2011
Transport meetings & Training
July 2011 – June 2012

- Denial of Shipment
- Transport Regulations
- Radiation Protection
Training in Panama
WNA TWG

- DOS update, Edlow International
  - South African transit licence; Long Beach
- Freight Hedging and Risk Management
  - Reduce exposure to freight volatility
- CIS Navigation
  - Class 7 service to/from St. Petersburg, E USA, W Africa
“Meet the Experts”

Noting that the timely shipment...is being affected by incidents of denial and delay of shipment...

Welcomes and encourages efforts...calls upon Member States to facilitate the transport...to each nominate a national focal point...looks forward to a satisfactory and timely resolution...

Underlines the...importance of...programmes for education and training...

Submitted by 49 countries
DOS Presentation by Paul Gray
- Health & Welfare; Supply Chain; Challenges
- Reasons for Denial; Progress; Solutions

255 participants; 60 countries; 54 papers

"The transport regulatory system (both safety and security) needs to be harmonized to avoid conflicts and varying requirements."

"Denial of shipments can adversely affect security – e.g., if a package is left at a facility, it may be misplaced or abandoned. Efforts to reduce denials have both safety and security benefits."
Future Meetings

- European ALARA Network – NORM
  - 11/11 Hasselt – ISC Chair paper on DOS
- ISC 7
  - 02/12 Vienna – invited Air Canada and Hapag Lloyd
- IRPA 13
  - 05/12 Glasgow – IAEA presentation
- RAM Transport
  - 05/12 London – [former] ISC Chair paper on DOS
- EUNORM
  - 06/12 Tallinn – [former] ISC Chair paper
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24<sup>th</sup>-28<sup>th</sup> October 2011
Denials into Facilitation – Industry

Industry Action

- Meet the Senior Management of the maritime company to provide awareness on the issue of denial
- Any shipping line policy of no carriage of Class 7 to be passed on to IMO for its awareness

Industry Action

Pre-requisite: all solution paths must have been explored by industry first.

1. Industry/IAEA contact National Focal Point or National Liaison Officer, then Regional Coordinator;
2. ISC-MT advises IAEA on upgrading instance;
3. IAEA contacts Permanent Mission in Vienna with form on perceived Denial.
IAEA provides a global networking structure for the transport of radioactive material, with a special focus on facilitating denials of shipment.

The quality of the networks and their outputs rely mainly on Member States to create and maintain National Networks, and partly Regional Networks.
How to move forward?

- **Regulators - Additional Regulations:**
  - Identify and justify; advise the IAEA
  - Integrate or eliminate; harmonise TS-R-1

- **Industry - Report Instances:**
  - Timely report submission to NFP/RC/IAEA

- **IAEA - Ongoing Maintenance Required:**
  - Regular communication & training
Thank You

ANY QUESTIONS?
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