



**The RPMASA – is a registered NPO, which provides -**

- A focal point for all users & transporters of Industrial and Retail Packaging for chemicals, Products & dangerous articles
- Information, Audit, Training, Consulting and Value-adding Services to assist Industry with Regulatory compliance
- A voice to Government on regulatory issues related to packaging, labelling & transport of chemicals, products & waste.
- Safe Packaging Solutions to protect people, property and the environment,
- Advocates Extended Producer Responsibility and partnerships for sustainable use of resources, & reduced waste

**Responsible Packaging Management cuts across ALL Sectors – Industry and Retail**

**RPMASA is the only Industry body from Africa with representation on the UN Committees of Experts for Transport of Dangerous Goods & the GHS, providing advance information on regulations + unique networking opportunities**

**All information is given in good faith**

**Number 79: August 2018**



Richard Green - LC Packaging

Pat

Judy

Philip

Nonhlanhla & Richard

Nonhlanhla Bhengu - Bowisolve

## Things you Need to Know – meet some of our Directors above

1. Patron Member profile – focus on LC Packaging
2. SAMSA Launches investigation after 13 Containers go overboard the MSC Chloe – Is your training up to date?
3. EU Ports impound shipments from South Africa due to non-compliant packaging
4. Supply Chain News: Deadly Maersk Fire in March Driving Changes to Prevent Fires, Reduce Human Risk
5. Focus on Training – ICHCA / TT Club / RPMASA
6. SAMSA Marine Notice Update
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8. International Regulations + ISO & SANS Standards news – Members are encouraged to participate
9. Events of Interest – Conferences, Seminars & Symposiums
10. Member news and Training Opportunities

RPMASA invites application from experienced GHS Consultants to apply to participate in our GHS Expert Database

## Our Patron Members



1. **Meet Richard Green Regional Director of Lc Packaging a global packaging company with Head Office in the Netherlands, and a strong footprint in Africa** and the Middle East with Manufacturing Premises in Pietermaritzburg. Richard and his team at Lc Packaging provide a range of **compliant packaging solutions** focussed predominantly on the Mining, Chemical and Agricultural Sectors, but will be happy to discuss solutions for organisations in any sector requiring their range of products. see <http://lc-packaging.co.za/> & contact 011 615 4169 for further information.

2. **SAMSA has Launched an investigation after 13 Containers went overboard from the MSC Chloe in heavy seas, 22 miles out of the Port of Durban, in August.**

[Do you export by sea, or ship products Coastwise? Is your IMDG, CTU Packing & VGM Training up to date?](#)

This incident highlights the need for those involved in shipping to ensure that their IMDG, CTU Packing and VGM Training up to date as the investigation will include checking on the cargo owners, and who packed the containers and if their relevant personnel have been Trained and if this is up to date.

Containers overboard can float semi-submerged for a considerable time due to entrapped air and can pose a serious risk to small craft in the area + drift unpredictably. Loss of a small craft with potential loss of life and or marine pollution are serious offences which can incur severe penalties. Make sure your people are Trained and pack AND secure contents of containers in line with the CTU Packing Code of Practice to reduce risks!

**Contact Judy for Training information**

3. **EU Ports impound shipments from South Africa due to non-compliant packaging**

Kindly be aware that the EU and other Ports around the world check incoming Containers at random for compliant contents.

EU are Ports particularly vigilant with the final dates of REACH Compliance now in the past and we understand that a number of shipments over the last couple of years have been impounded for non-complaint packaging of various types - from reconditioned IBC's to drums and bags, as well as having incorrect labelling. Unfortunately, a number of these have been from South Africa hence this puts a greater focus on incoming shipments from our region SO PLEASE check that your classification, packaging, labelling and SDS are compliant for the local market, shipping and the country/s you are exporting to! NB Containers are also sometimes transhipped.

The costs of non-compliance can be huge and include the cost of warehousing, repacking, new compliant packaging & labelling + penalties /unit! Lack of Training is also a non-compliance so have your people been trained and do you have records of this? Costs of loss from a ship or damage to other cargo is huge too.

The USA Penalties for Marine Pollution under MARPOL start at \$70 000 and for first offence for a hazardous waste spill \$164 000!

Do your packaging suppliers/ manufacturers advise you on compliant packaging and labelling requirements for your products or do they need Training too? RPMASA provides Training solutions to assist you, from in-house classroom to eLearning – contact us with your needs.

NB the numbers of containers handled in a busy Port daily are huge hence a very small percent can be checked.

[TT Club statistics show that the vast majority of accidents by all modes but particularly at sea are due to Misdeclaration of cargo where incompatibility in stowage can spell disaster and fires!](#)

- [Non-compliant packaging with spills and leakages causing accidents and incidents](#)
- [Non-compliance with CTU Packing for packing and securing of cargo within a container causing movement, damage and potential loss of cargo!](#)

**What price ignorance against high cost of non-compliance, as this is no defence in the eyes of the law – Training is the cheap solution to risk prevention!**

RPMASA with its International participation in UN Regulations, and its International partnerships is the leading SA Association for Information, Consulting and Training for dangerous goods and cargo compliance.

4. **Supply Chain News: Deadly Maersk Fire Driving Changes to Prevent Fires and Reduce Human Risk**

On March 6, 2018, a Maersk container ship caught fire in the Arabian Sea. The Maersk Honam was in route from Singapore to the Suez Canal when a fire broke out in its cargo hull some 1,000 miles off the Oman coast. The ship was almost new as only a year old!

Maersk said 23 crew members were evacuated to a nearby vessel named ALS Ceres after sending a distress signal when they could not extinguish the fire. Tragically, the blaze left five dead.

The fire unbelievably took some five weeks to extinguish. The 15,000-container ship was half full of 7,680 boxes. The cause of the fire is still unknown **BUT Misdeclaration of cargo content and non-compliant packaging are major causes of these types of incidents.**

For the full story read <http://www.scdigest.com/ontarget/18-07-25-2.php?cid=14489>

This unfortunately is one of a growing number of ships fires, putting life at risk + causing huge costs in damage, see also -

March 2016 - Hyundai Fortune in was abandoned near south Yemen following an explosion below deck which burned for days and destroyed over a third of the 5, 551 TEU's.

April 2017 - MSC Daniella 13 800 TEU caught fire off Sri Lanka, it took the Authorities over 12 hours to control  
Feb. 2017 – MSC Austria carrying hazardous materials caught fire off Port Elizabeth & took 2 days to control!



**Deadly Maersk Honam  
Fire Triggering Changes**

5. **TT Club advises companies to Focus on Training to prevent disasters!**

Most individuals and organisations know that training is an important requirement to develop skills. However, appropriate, needs-based training is more difficult to define and control as it's benefit clearly needs to be evaluated in the light of defined needs and considered in relation to current skills gaps and future requirements as the world around us changes.

Training, however should not stand alone, it needs to be incorporated in effective plans to upskill and build 'competence' in the workforce rather than focus on simple compliance with law or regulation. Most of all, training should be part of the journey towards, not just meeting but, exceeding compliance and safety requirements.

**Analyse the needs** – Regulatory requirement, Best Practice + the risk of not implementing?

The UK's Health & Safety Executive recommends that managers consider:

- the specific job or task
- the person(s) carrying it out and their existing capabilities
- the processes and the equipment required
- how that training will be delivered and by whom

Read full article [https://www.ttclub.com/loss-prevention/tt-talk/article/tt-talk-lifting-the-lid-on-training-144894/?dm\\_i=2RU,5SOUI,GCHODE,MMKP5,1](https://www.ttclub.com/loss-prevention/tt-talk/article/tt-talk-lifting-the-lid-on-training-144894/?dm_i=2RU,5SOUI,GCHODE,MMKP5,1)

*NB Thanks to Capt Richard Brough OBE, Technical Adviser to ICHCA International for compiling this article*

The inter-relationship between training and competence must be a pressing issue in relation to the transport of dangerous goods, surely? **Training was discussed recently at the UN TDG June Meetings raised by Canada to produce a Training Standard - a Work Group was formed in which RPMASA is participating.**

**"Training alone however does not necessarily check that the employee is competent"**

Whilst the UN Model Regulations for the transport of dangerous goods (the UN Orange Book) provides the basis for each set of modal regulations, the requirements for dangerous goods training and how it is implemented varies from

- mode to mode (air, road, rail, inland waterway and sea)
- region to region, (e.g. Europe, North America)
- and country to country (e.g. Germany, USA)

Such variations are as result of the culture within that mode and/or within the region.

Read more [https://www.ttclub.com/loss-prevention/tt-talk/article/tt-talk-dangerous-goods-training-144892/?dm\\_i=2RU,5SOUI,GCHODE,MMKP5,1](https://www.ttclub.com/loss-prevention/tt-talk/article/tt-talk-dangerous-goods-training-144892/?dm_i=2RU,5SOUI,GCHODE,MMKP5,1) from *Keith Bradley Former UK Maritime & Coastal*

## 6. **SAMSA MN25 of 2018 - This Marine Notice introduces the IMO/ILO/UNECE Code of Practice for Packing of Cargo Transport (CTU Code) – replacing Marine Notice no. 24 of 2002 informs -**

The Merchant Shipping Carriage of Cargoes Regulations: 7(2)(a) Where packaged goods have been packed into or onto a cargo unit, the shipper or forwarder of such goods must ensure that the cargo is packed and secured to prevent, throughout the voyage, damage or hazard to the ship and the persons on board.

Improperly packed and secured cargo in CTU's, the use of unsuitable CTU's and the overloading of CTU's pose a risk to personnel and property during the course of the logistics chain.

The IMO, ILO and UNECE produced a code of practice for packing CTU's the aim of which is to advise on:

- safe packing of cargo transport units (CTUs)
- responsibilities for the packing and securing of the cargo within the container
- information and advice for all parties in the supply chain including those unpacking a CTU.

SAMSA Clause 6 states that SAMSA strongly recommends that this advisory Code of Practice is considered for the packing and securing of cargo in CTU's.

This marine notice is to be read with Marine Notice 30 of 2016 Guidelines for the Implementation of SOLAS VI Regulation 2 Amendment: Verification of the Gross Mass of Packed Containers

**For more information see [www.imo.org](http://www.imo.org)**

## 7. **Legislation Updates – Industry Waste Management Plans, have you given input?**

The Department of Environmental Affairs (DEA) requires "Producers" in the paper and packaging, electrical and electronics, and lighting industries to submit Waste Management Plans that outline how they will manage waste generated in their industries.

This process started in December 2017 with a deadline for 6th of September 2018.

**What / Who are "Producers"?**

A "Producer" includes any person, or category of person, or a brand owner who is engaged in the commercial manufacturing, conversion, refurbishment or importer of new and/or used:

- Paper and packaging material,
- Electrical and electronic equipment,
- Lighting equipment or
- goods wrapped in primary or secondary packaging material.

Download the guidelines from <http://sawic.environment.gov.za/documents/570.pdf> and contact

Packaging SA to give input or get a copy of the draft <https://www.packagingsa.co.za/>

## 8. UN TDG & GHS meetings and the Latest ISO & SANS Standards

**UN TDG & GHS meetings were held in Geneva from 27 November to 8 December** – Report will be made available to Members NB the 20<sup>th</sup> revision of UNTDG Orange books published in June 2017 are currently being phased in to come fully into effect 1 January 2019, with the 21<sup>st</sup> revn due to be published in June 2019. Similarly, the 7<sup>th</sup> GHS revision was published in June 2017 and the 8<sup>th</sup> will be published in June 2019

### **SANS Standards revisions recently published**

**SANS 10231 Transport of dangerous goods** – Operational requirements revision published in June

**SANS10232-1** Emergency Information Systems and **SANS10232-4** Transport of Dangerous Goods - Transport Emergency cards published in June

### **SANS Standards currently under revision**

**SANS 10229 to incorporate ALL packaging Standards i.e. parts 1 & 2, SANS 10233 IBC's and 10406 Reprocessing of previously certified packaging's for Road and Rail Transport** – Caution to Industry that the current Standards are way out of date as this revision was started 2013. The pending revision is hoped to be available for public comment soon to assist Industry exporters comply! The next revision will be as a cross reference document to the UN TDG

**SANS 10234 Globally Harmonized System of classification and labelling of chemicals (GHS)** Document to 4<sup>th</sup> UN GHS has been out for public comment and should be published late this year or early new year. A cross reference Standard to the 7<sup>th</sup> UN GHS has been prepared which should be made available shortly after publication of the pending revision.

**SANS 10368 Transport of low-hazard goods in bulk – Emergency information for road vehicles** revision to rationalise the placards with hazard diamonds will be finalised for publication soon with a 2-year phase-in.

**SANS10263 Warehousing & Storage** – revision still being drafted by Convenor

**SANS 969-1 & 2** Clean-up of dangerous and non-dangerous goods incidents for road & rail occurrences – being finalised for public comment in the new year

**SANS 14046 Water footprint** – DSS Public comment

**ISO 14034 Environmental Technical Verification (ETV)** – new Standard & awaiting outcome of vote

**ISO19011** Guidelines for Auditing Management Systems revision is now in Committee Draft

**ISO 9004** Quality Management Guidelines - under revision to align with ISO 9001

**ISO14008** Monetary valuation of environmental aspects & impacts, principles, requirements & guidelines, revision is in progress

**ISO14064-3:2005 Green House Gasses** – Specification with guidance for the validation & verification of GHG assertions in Progress

**ISO 10005:2005** QMS – Guidelines for Quality Plans – under revision

**ISO 10006:2003** QMS – Guidelines for Quality in Projects - under revision

**ISO 45001** Occupational Health & Safety Management – awaiting advice on estimated publication date.

**Anyone interested in participating in the Committees for any of these Standards to please contact Judy on [info@rpmasa.org.za](mailto:info@rpmasa.org.za) or 032 947 1145.**

***NB to keep Industry up to date with International and shipping regulations essential for those who export, the SABS Technical Committee have agreed that all future revisions of SANS 10229 Packaging will be cross reference document to the UN TDG Model Regulations - Orange books, and that future revisions of SANS 10234 will be cross reference to UN GHS purple Book***

## 9. Events of Interest

Environmental Law Workshop – Rosebank, Johannesburg - 28 -29 August

Business of Africa Conference - GIBS, Illovo - 26 September

Infrastructure Africa Business Forum - Sandton Convention Centre - 9 to 10 October

WasteCon – Emperors Palace, Johannesburg – 15 – 19 October

IMESA Conference – Summerstand, Port Elizabeth – 31 October – 2 November

World Water Week - Stockholm, Sweden - 26 August - 31 August

Global Climate Action Summit - San Francisco, California - 12 September - 14 September

The 7th World Sustainability Forum - Beijing, China - 19 - 22 September

Climate Week NYC – New York City, US - 24 - 30 September

HCC China – Hangzhou – 5 – 6 September

Labelmaster DG Symposium - DGS XIII - Chicago, US – 5 – 7 September

Gastech - Barcelona, Spain – 17 – 20 September

FachPack - Nürnberg, Germany – 25 – 27 September

Tank Storage Asia – Singapore – 26 – 27 September

TSA Conference & Exhibition - Coventry, UK – 27 September

EPCA Annual Meeting – Vienna, Austria – 7 – 10 October

## 10. Members news and Training Opportunities - Benefits include -

**Value-adding Supply Chain Solutions, Awareness Raising & Capacity Building**

RPMASA has Partnered with Exis Technologies, Hibiscus and REACH Delivery to provide opportunities and solutions to assist Industry with eLearning Training from Exis to fulfil Regulatory obligations  
GHS Classification, GHS compliant SDS and label Compilation from Hibiscus  
Ensuring records of up to date GHS compliant SDS to customers to fulfil OSH Act regulations from REACH Delivery

RPMASA provides Members with Information and Advice, as well as excellent networking opportunities with our National & International Partners - see website, as well as -

Opportunities to Input into International & National Regulations and Standards – feedback please?

**Training solutions** – including GHS: IMDG: CTU Packing and VGM

**Compliance Audits** – Site and issues such as CTU, VGM, CDI IMPCAS

**Consulting Services** – e.g. Assistance with GHS Classification, SDS, Labels & packaging

**Safety Data Sheet Management Software** - <https://www.hibiscus-plc.co.uk/>

**Training materials & posters**

**REACH Delivery – invaluable aid to SDS delivery & OHS Act Compliance. RPMASA Members enjoy a free trial AND discounted rates see – <http://www.reachdelivery.com/>** go to legislation to see extracts of the SA OHS Members can contract with **REACH Delivery of the UK at RPMASA Members discounted rates**, to use their cloud-based service for audited delivery reports of SDS to customers for OHS Act compliance.

**Contact Judy for more information on EXIS, Hibiscus & Reach Delivery + demonstration can be arranged**

**Membership** – see RPMASA exciting benefits to assist Members with compliance.

- **Platinum and Patron** members receive a free \*Audit for their packaging, storage and transport issues.
- **Platinum Membership** – an elite grade for Industry Leaders committed to EPR, Sustainable use of resources, Environmental and Responsible Packaging Management Excellence, and Legal compliance. It encompasses multiple sites and business units in SA and neighbouring Countries.
- **Patron Membership** is a special grade which covers up to 3 sites or business units.
- **Member grade** is for 1 site or business unit with additional fee for extra sites
- **\*Other Member grades** can book a compliance Audit at their own cost

**Order your copies of our Awareness Posters now -**

- Comparison of Transport and new GHS Symbols – A1 laminated R450, A2 R350
- Stand alone poster of the new GHS Symbols
- GHS Awareness
- Understanding the GHS – set of 3 x A1 laminated, R1 450 or A2 R1 250 / set
- Understanding the Waste Act & Regulations – Set of 3 x A1 laminated – R1 450; A2 R1 250/ set
- **Safe Drum Emptying Posters** – don't waste valuable product or resources – A0 not laminated R450

**[Yours in Responsible and Sustainable Packaging and Supply Chain Management – www.rpmasa.org.za](http://www.rpmasa.org.za)**  
**[Contact Judy on info@rpmasa.org.za or 087 722 1636/081 264 6678](mailto:info@rpmasa.org.za)**