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INLAND TRANSPORT COMMITTEE

Working Party on Customs Questions affecting Transport

(One-hundred-and-seventh session, 15-18 June 2004,

agenda item 6 (c) (iv))

**CUSTOMS CONVENTION ON THE INTERNATIONAL TRANSPORT
OF GOODS UNDER COVER OF TIR CARNETS (TIR CONVENTION 1975) ^{*/}**

Application of the Convention

Amendment proposals relating to technical provisions

New Comment to Annexes 2 and 7

Submitted by the Government of the United States of America (USA) ^{/}**

^{*/} The UNECE Transport Division has submitted the present document after the official documentation deadline due to resource constraints.

^{**/} Mention of firm names and commercial products does not imply endorsement by the United Nations.

A. BACKGROUND

1. At the one-hundred-and-sixth session of the Working Party, the representative of the United States of America pointed out that the positioning of the lock of the fibre-optic cable close to the handle of the load compartment might have negative repercussions on its functionality. The Working Party requested the secretariat to take account of this complicating factor when finalizing the text of the draft comment to Annex 2, Article 3, para. 10 and to submit the full text of the amendment proposals to the TIR Administrative Committee for consideration and possible adoption at its forthcoming session (TRANS/WP.30/212, para. 40).

2. After the session, in the course of the frequent contacts between the American authorities and the secretariat, it transpired that the observations raised by them were not limited to the use of fibre-optic cable, but touched upon the various issues related to the placement of seals.

3. In the light of these developments, the American authorities have submitted the following proposal, which could be included as a new comment to, possibly, Annex 2, Article 2, paragraph 1 (b). The comment applies mutatis mutandis to Annex 7.

B. CONSIDERATIONS BY THE WORKING PARTY

4. The Working Party may wish to discuss, and possibly adopt, the proposal for the introduction of a new comment, contained in the Annex to this document, submitted by the Government of the United States of America.

Annex

Draft comment to Annex 2, Article 2, paragraph 1 (b)

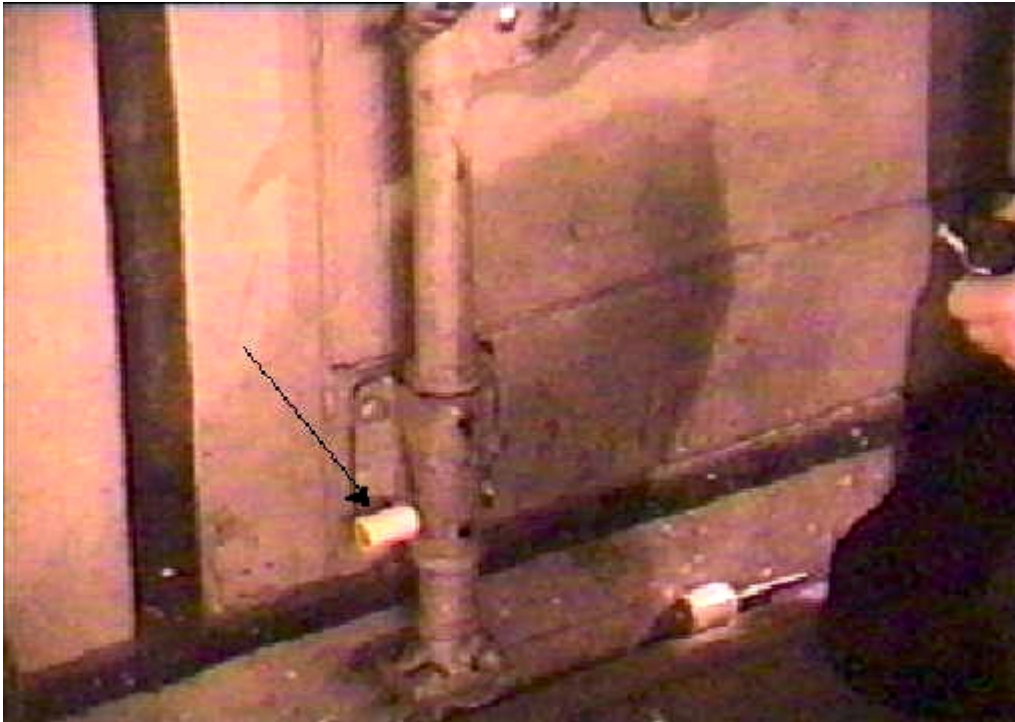
Add a new comment to Annex 2, Article 2, paragraph 1 (b)

“Placement of seals

In order to minimize the vulnerabilities of container door hardware and increase container security, seals should be placed in one of the following four ways:

- (a) A ½ in. (1.27 cm) hole should be drilled through the vertical bar on the right-hand door of the container and through the lower plate fastening that bar to the door of the container. A mechanical or electronic seal should then be affixed through this hole, covering the rivet heads on the plate to prevent tampering. The placement of a seal in this manner will prevent opening of the container, despite any tampering with the handle area. (See photo A)*

Photo A

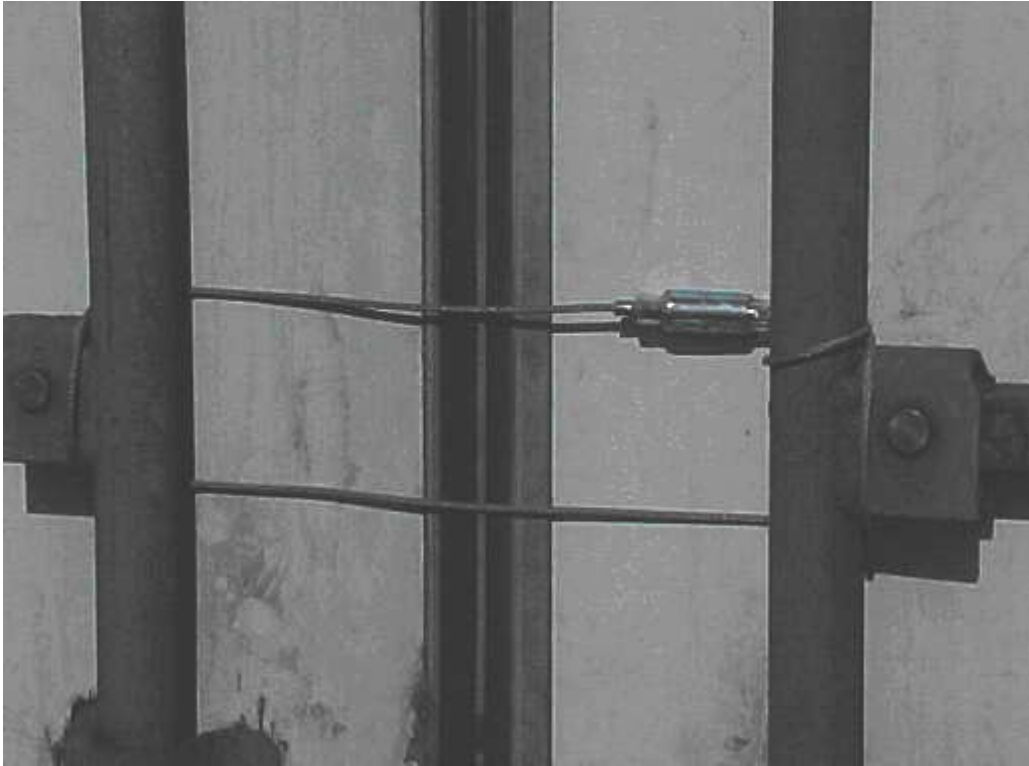


(b) Cable seals should be attached as per the manufacturer's instructions. In addition, when affixed, cable seals should be tight, with all excess cable looped, twisted or otherwise secured to prevent them from moving easily. (See photos B and C)

Photo B



Photo C



(c) Security is also enhanced by having an additional sealing point near the bottom of the door. When a seal is affixed in this location, the door cannot be opened regardless of attempts to tamper with the handle hub area.

Photo D Maersk/Sealand Containers



(d) Locking Rod Seal Retainers

Locking rod seal retainers represent another location for placement of mechanical seals.

(See photo E)

Photo E P&O Nedlloyd Containers

