

SAFESEANET OPERATIONAL AND LEGAL ASPECTS

HAZMAT Working Group – Final Report

Submitted by EMSA

<i>Summary</i>	Presents the work carried out by the HAZMAT Working Group with respect to the drafting of Guidelines on reporting HAZMAT information in SSN and requirements for a Common HAZMAT Reference Database.
<i>Action to be taken</i>	As per paragraph 4
<i>Related documents</i>	a. Directive 2002/59/EC, as amended b. HLSG 9.3.2 c. SSN WS 19/3/5, 20/1/3 point 2.2 and 21/4/2

1. BACKGROUND INFORMATION

The High Level Steering Group (HLSG) 9 agreed to establish a HAZMAT Working Group (HWG) with the objective to develop and propose measures for improving the reporting of dangerous and polluting goods (Hazmat) in SafeSeaNet. The deliverables of the working group were to draft:

- Guidelines on reporting HAZMAT information; and
- Requirements for the development and maintenance of a common HAZMAT Reference Database (CHRD).

14 Member States and 3 industry associations participated in the work of the HWG.

In accordance with the agreed Terms of Reference, EMSA developed and distributed concept papers in January 2014 and a meeting of the HWG was held on 25th February 2014 at EMSA offices in Lisbon. Following this meeting, work continued by correspondence and the draft of the Guidelines (Annex I) and the Requirements for a CHRD (Annex II) are being referred for the approval of the SSN Group.

A summary of the content of these documents is given below.

1.1 Guidelines on reporting HAZMAT in SafeSeaNet

The concept paper on the Guidelines had primarily addressed the reporting of HAZMAT information to the SafeSeaNet system by the shipping industry. However, the HWG highlighted that proper reporting to SafeSeaNet also depends on the quality of information that is supplied by the manufacturers and the shippers to the ship data providers. In other words, correct information can only be guaranteed if the source information is correct. Therefore, the HWG agreed that the Guidelines will cover the reporting obligations on three levels:

- Industry to the National Single Window;
- National single window to the National SSN system; and
- National SSN system to the central SSN system.

The draft Guidelines address issues related to who, why, what, when, where and how to report HAZMAT information. They also include additional topics which could further ensure good quality data in the SafeSeaNet system: validation options, available training opportunities on HAZMAT awareness and use of Incident Reports for exchanging information on non-compliance in HAZMAT notifications.

The HWG developed the Guidelines as a holistic document that covers the requirements of both the industry and the public authorities. They can serve as a quick reference document for reporting parties and authorities and can be used during training sessions to enhance the awareness on the importance of correct reporting.

1.2 Common HAZMAT Reference Database (CHRD) Requirements

The HWG considered that the CHRD should:

- a) Serve as a reference to shippers, shipping industry and Member State authorities when completing HAZMAT notifications. Competent authorities and EMSA services could use it as a verification tool to cross-check and validate the correctness of the HAZMAT data.
- b) Include a list of all the dangerous and polluting goods that have to be notified in SSN.
- c) Have a link to the MAR-CIS database which is being developed by EMSA and includes information on hazards and risks of HAZMAT products during emergency response situations.
- d) Be hosted at central level so that Member States will have easy access to harmonised and updated HAZMAT information. However, Member States will have to develop their own mechanism if they wish to download and retain a copy of the CHRD in their systems and make it available to their national authorities and shipping industry.
- e) Be available to the users via an EMSA dedicated HAZMAT webpage, the SSN web interface and a system-to-system interface. In the latter case the development time-frame is longer than in the previous two cases because it requires the elaboration of the appropriate technical messages. Therefore, the HWG recommended, and SSN Group 21 approved, that the CHRD is developed over a two phase approach – first develop the web interface options and then the system-to-system interface.

SSN Group 21 raised the issue of whether the Databases could be made available to industry. EMSA contacted the IMO who confirmed that it has no objection that EMSA makes the database, with the list of data elements mentioned in Annex II, available to the industry.

PROTECT noted that it is not always possible to identify the correct HAZMAT product and to link the electronically reported information with the other sources and an efficient way to identify that data has been validated. Therefore, PROTECT recommended that the CHRD includes an additional Unique ID data element for each of the HAZMAT products and which could be reported by reporting parties on a voluntary basis. Some members of the HWG remarked that such an issue should be discussed at the SSN Group 22. Therefore, PROTECT submitted a paper for the consideration of the SSN Group (Annex IV).

2. PROPOSALS OF THE HAZMAT WORKING GROUP

2.1. Draft Guidelines and CHRD

In view of the progress achieved by the HWG, the proposal being put forward for the consideration of the SSN Group is to approve the draft Guidelines presented in Annex I and the CHRD (Annex II).

The SSN Group is also being invited to consider the proposal put forward by PROTECT to include a unique HAZMAT ID in the CHRD (Annex III). As proposed by PROTECT the use of the Unique HAZMAT ID will remain on a voluntary basis. However, it can only be used effectively once the relevant SafeSeaNet messages are amended to include the possibility to exchange this data element between Member States. If this proposal is approved the CHRD requirements will be amended accordingly.

2.2. Amendments to the XML Reference Guide

The HWG noted that the XML Reference Guide (XMLRG) V3.01 includes guidance on HAZMAT reporting which may be inaccurate or which are better explained in the Guidelines, for example, Annex C of the XMLRG may be removed and references to the Guidelines are added. Therefore, it is suggested that EMSA reviews the XMLRG to identify any non-aligned provisions and proposes to the SSN Group how best to remove such inconsistencies.

2.3. Re-establishment of the HWG

The HAZMAT working group has delivered the expected documented and has therefore completed its work within the time frame established in its Terms of Reference. The Terms of Reference also establish that at SSN Group 22 the mandate of this working group will expire, or, if necessary, be renewed with new TORs. In its discussions the working group noted that the Guidelines and the Database, once developed, should be reviewed periodically so that it is maintained up to date taking into consideration changes to legal acts and operational requirements. For this reason the SSN Group should, whenever deemed necessary and in particular following major amendments to the IMO Codes and Conventions identifying HAZMAT products, re-establish the working group to review the Guidelines and the CHRD (once it is established) and to propose the required amendments to the SSN Group.

3. ACTION REQUIRED

The SSN Group is invited to:

- a) Note the work carried out by the HAZMAT Working Group,
- b) Approve the draft Guidelines on reporting HAZMAT information (Proposal 2.1 and Annex I),
- c) Approve the Requirements for a CHRD (Proposal 2.1 and Annex II),
- d) Consider the proposal by PROTECT to include a HAZMAT Unique ID in the CHRD (Proposal 2.1 and Annex III),
- e) Agree that EMSA reviews the XMLRG and identify improvements related to HAZMAT reporting (Proposal 2.2), and
- f) Agree that the HWG may be re-established, when necessary, to update the Guidelines and the CHRD (Proposal 2.3).

HLSG 12 will be duly informed of the outcomes of SSN Group 22.

Annexes:

- Annex I: Draft Guidelines on reporting HAZMAT in SafeSeaNet
Annex II: Draft Requirements for a Common HAZMAT Reference Database (CHRD)
Annex III: HAZMAT Unique ID – proposal by PROTECT