Chapter 42 – Container Top Safety

Container top safety has been discussed in detail by various maritime organisations. The conclusions have brought about numerous changes in the applicable laws in a number of countries, most notably the USA and Japan. Both of these countries require all ships calling at their ports to comply with their legislation relating to the safety of dockworkers in the operation of loading and unloading containers. This includes the requirement that dockworkers are able to secure containers without going onto the top of containers that are stacked more than one high, whether on the quayside or on the ship. For ships to comply with the applicable law means that the equipment for fitting and securing containers on board the ship is operated from the deck level, or possibly a safe walkway level.

To ensure that containers are safely secured, automatic or semi-automatic twistlocks should be used and lashing rods need to be constructed such that they can be handled easily and safely, and secured properly, without the dockworkers having to be raised above the level of the deck or safe walkway.

The top tier of a stack of containers should be secured at the top of the container and the positioning of bridge pieces normally achieves this. Dockworkers do need to be positioned on the top of containers on the top tier to fit these bridge pieces. The port or terminal normally has specialised cages fitted with fall-arrester systems to facilitate this operation.

The ILO's *Code of Practice on Safety and Health in Dock Work*, Section 16 (Reference 71) specifies the guidance for 'access to the top of a container'. It requires purpose-built container ships to carry a safe means of access consisting of a stowable gantry frame fitted with suitable ladders and guarded walkways, and a means of locking the gantry against movement on deck. If such a frame is not carried by the ship, a similar arrangement should be available on the dock.

MSC.1/Circ.1263 (2008) *Revised recommendations on safety of personnel during container securing operations* (Reference 72) and amendments to the *Code of Safe Practice for Cargo Stowing and Securing* (CSS Code) through MSC.1/Circ.1352/Rev.1 (Reference 69) further enhance the safety of workers when accessing containers. These amendments specifically require an approved Cargo Safe Access Plan (CSAP) for purpose-built container ships. However, all of these arrangements for loading and unloading ships are based on the ship being alongside a pier, quay or wharf and properly secured against unwarranted movement.

The fact that cargo operations usually take place in port terminals does not mean that the ship's crew can afford to be ignorant of the arrangements for safe handling of cargo and the special nature of the equipment involved, as they will need to be able to operate these items of equipment in an emergency while the ship is at sea. Training in the safe operation of these pieces of equipment is an essential part of the management and running of the ship as required by SOLAS. Initial training can be carried out at shore-based facilities, provided that a sufficient mock-up of the arrangement for stacked containers on board can be arranged, but training in the ship environment is likely to be more instructive.

All training should be practised frequently, in a safe environment, and should be reviewed after each session. This is essential as the requirement for automatic and semi-automatic equipment becomes more widespread in ports and terminals throughout the world.

The ship's crew should be wary of doing any part of the job that would normally be done by dockworkers. The correct fixing and lashing of containers, irrespective of whether they are on or under deck, is a specialised job and should always be left for the specialists. Ship's personnel, who ultimately have the responsibility for the safe carriage of the cargo, should oversee the fixing and lashing on board.

Ship operators must follow the rules and regulations applicable to each port and should be aware that these are likely to vary between ports.

Any ship that does not have the particular equipment in use for a specific country's requirements should never consider trying to undertake releasing or lashing work whilst at sea, in coastal waters, or manoeuvring within port limits, as this would be very dangerous both for the crew and the cargo.

The countries that operate ‘safe dockworker’ principles should still have facilities to handle all ships that call at their ports. There should be other methods of ensuring that their dockworkers operate in a safe way, even if this means going on the tops of containers to release twistlocks (assuming that a ship does not have automatic or semi-automatic units). How they do this work is not the direct concern of the ship, as long as the ship is loaded or unloaded effectively.

Dockworkers are provided with appropriate safety equipment, such as fall-arrester harnesses and ancillary equipment, and similar safety equipment should be provided for ships’ crews, even though this may only need to be used in an emergency.

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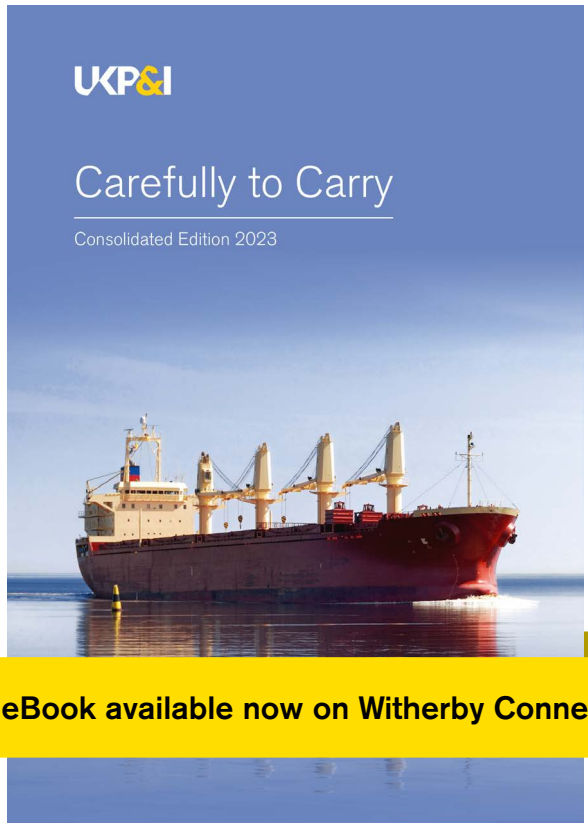

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