

THE FACILITATION OF INSTANCES OF DENIALS OF SHIPMENT FROM AN IAEA PERSPECTIVE

PATRAM 2010

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IAEA

International Atomic Energy Agency

Summary

- Background
- Part 1: New Structure for Facilitating Instances of Denials of Shipment
- Part 2: Action Plan
- Part 3: Future Challenges
- Conclusions

Acknowledgements

- National Focal Points,
- Regional Coordinators
- Members of the Management Team
- International Steering Committee
- IMO and ICAO Secretariats
- IAEA Transport Safety Unit

Summary Part 1 (New Structure)

NEW STRUCTURE FOR FACILITATING INSTANCES OF DENIALS OF SHIPMENT

- History
- New organizational structure
- Individuals
- Groups for facilitating: Networks
- Industry

Part 1 - History

- July 2003: IAEA International Conference on the Safety of Transport of Radioactive Material
 - industry facing reduced availability of transport routes, modes and carriers
 - develop a strategy for addressing this issue.
- GC(48)/RES/10C of the 2004 IAEA General Conference
 - welcomed “the progress made on the problems related to refusals of shipments of radioactive materials (in particular for medical applications), and looks forward to a satisfactory resolution of this issue.”

Part 1 - History

- GC(49)/RES/9B of the 2005 General Conference
 - welcomed “the progress made in conjunction with the International Federation of Air Line Pilots’ Associations (IFALPA) on the problems related to refusals of air shipments of radioactive materials (in particular for medical applications) and
 - looks forward to a satisfactory resolution of this issue, and
 - encourages the Secretariat to continue addressing the denial of shipping issue, including by establishing a steering committee to oversee the resolution of the problem, as recommended by TRANSSC.”

Part 1 - History

- GC(51)/RES/11 of the 2007 General Conference
 - “welcomed the formation of the International Steering Committee and
 - urges the Secretariat to actively facilitate the Steering Committee’s work including the further development of the action plan and a database on incidents of denials and
 - encourages Member States to cooperate with the Steering Committee and its work, and further
 - calls upon Member States to facilitate transport of such radioactive material when it is carried in compliance with the IAEA’s Regulations for the Safe Transport of Radioactive Material (Transport Regulations).”

Part 1 - History

- FAL 31 :
 - Submission of difficulties by Canada in shipping Cobalt-60.
FAL recommended development of Circular reviewing safe and expeditious transport of Class 7 materials, including Cobalt-60
- FAL.6/Circ.12, 11 July 2005 (Text discussed in FAL32)
- Assembly 24: Res.A.984(24), Dec. 2005
 - Dealing with “Facilitation of the Carriage of IMDG Code Class 7 RAM including those in packaged form used in medical or public health applications”

Part 1 - History

- FAL 34
 - Report by Correspondence Group (FAL34/11/2) and agreement on Denial Report Form and Working Process;
 - Secretariat requested to monitor denials and report back at subsequent FAL and General Assembly meetings
- FAL35 (2009) and FAL36 (2010)
 - Continuous reporting, IMO and IAEA collaboration

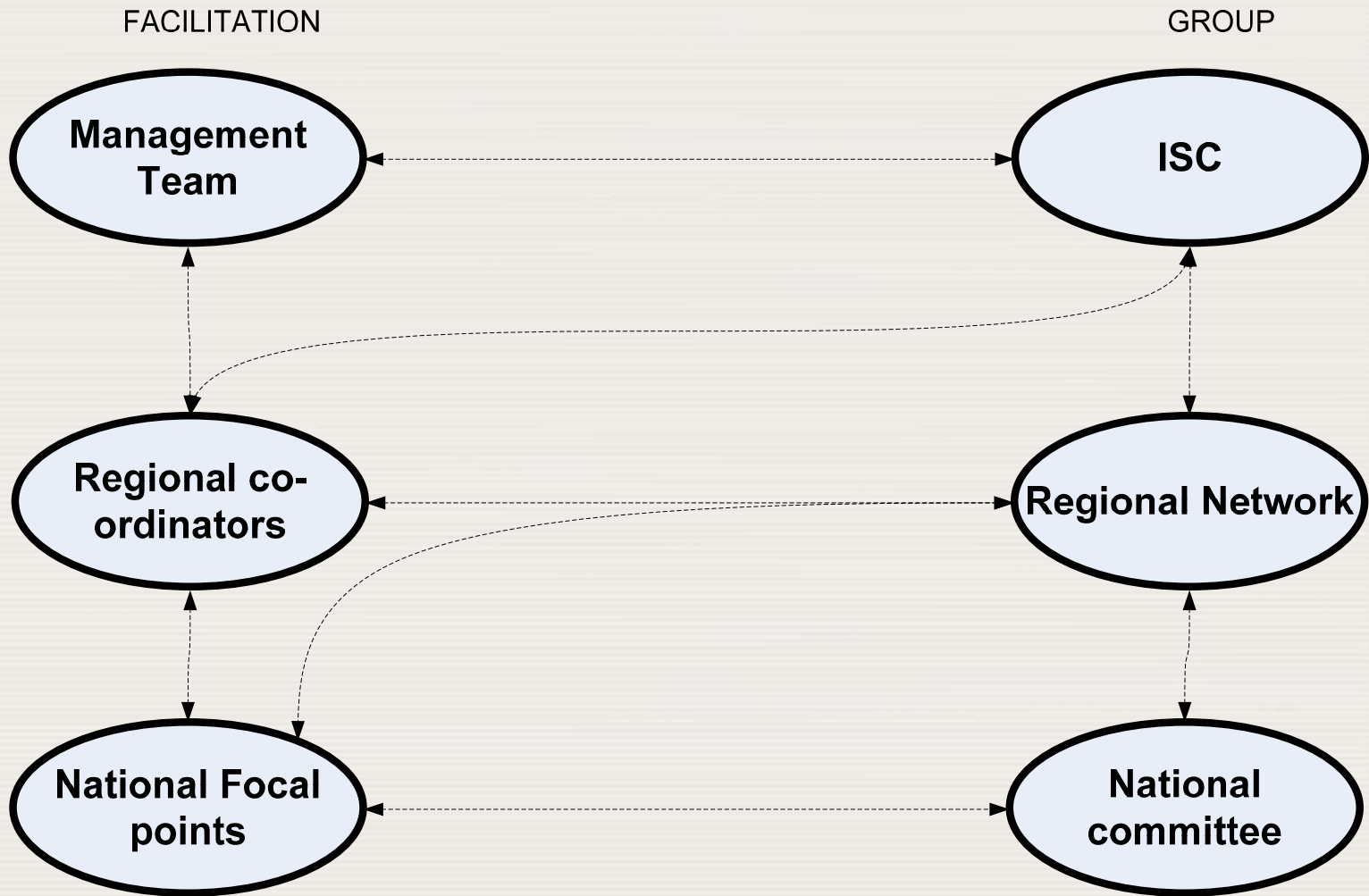
Part 1 – New organizational structure

- Reviewed structure
 - Individuals
 - National Focal Point,
 - Regional Coordinator and
 - member of the Management Team
 - Supported by groups in their facilitation action
 - National network/committee,
 - regional network and
 - International Steering Committee
 - 3 levels: national, regional and global.

Part 1 – New organizational structure

- includes also the Denial Secretariat
 - includes the secretariats of IMO, ICAO and IAEA,
 - serves as the interface between all individuals and networks.
- The role of the Denial Secretariat
 - to support the global structure,
 - to maintain the new organizational structure and
 - to provide tools such as the database, handbook and communication toolkit.

Part 1 – New organizational structure



Part 1 – Individuals

National Focal Point (NFP)

- IAEA requested in 2007 all Member States to nominate a NFP as single point of contact to deal with denials
 - 69 countries with NFP (on 151 MS of IAEA)
 - Most of the NFPs belong to competent authorities
- Roles and responsibilities defined to
 - Create and maintain a National Network/Committee
 - Share knowledge related to denials (webpage) including:
 - A listing of regulations impacting RAM transport
 - A listing of **harbours/maritime companies, airports/airlines clearing class 7 cargoes**
 - Participate in facilitating and solving instances of denials



Part 1 – Individuals

Regional Coordinator (RC)

- Countries assigned to regions (America, Mediterranean region, Europe, Asia Pacific, Africa)
- Intermediate level to cover hot spots of instances of denials
- Roles and responsibilities:
 - Create and maintain a Regional Network
 - Co-organize workshop
 - Maintain a regional Action Plan
 - Share knowledge on denials
 - Assist NFPs **in facilitating / solving instances**

Part 1 – Individuals

Members of the Management Team (MT)

- a Chair and two Deputy Chairs, one IAEA representative and the former ISC Chairs. Each ISC Chair
- Each ISC Chair will serve a term of one year
- Roles and responsibilities:
 - driving and coordinating the complete process of facilitation
 - defining strategy and Task Prioritisation in accordance with the ISC Action Plan
 - advising the IAEA on integrating the denial and delay work being done by the UN bodies
 - providing a regular update report to the ISC and holding monthly conference calls

Part 1 – Networks

Networks

- ISC first invited Member states to collaborate
- Networks introduced in a later stage
- Regional workshops helped:
 - to elaborate this structure
 - to develop the interface between the 3 levels
 - to analyse the efficiency of the process, the adequacy of the developed structure,
 - to provide feedback on the action plan.

Part 1 – Networks

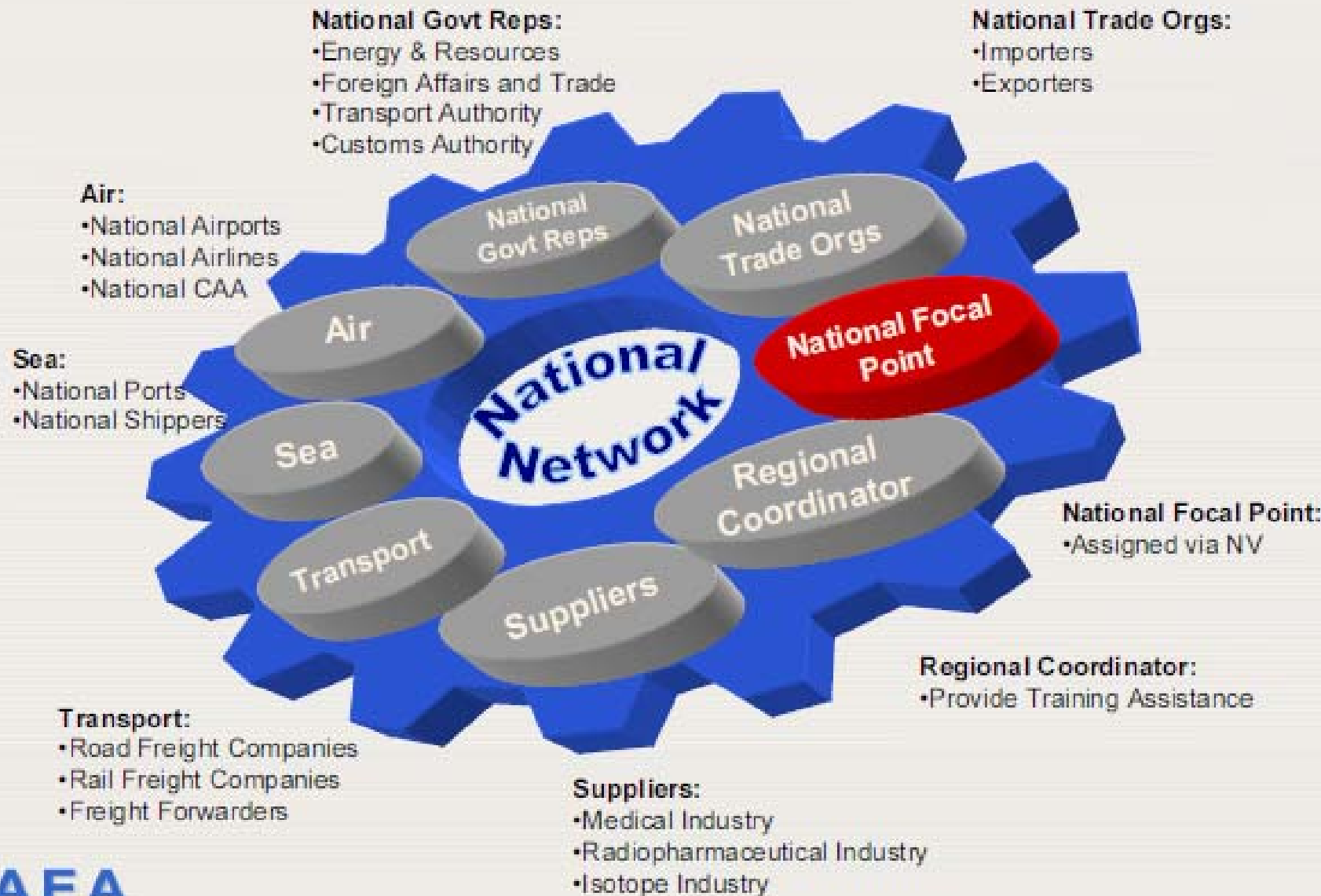
National Network

A NFP should in connection with the National Network:

- Identify and establish effective communication with key stakeholders in relation to the sustainable transport of radioactive material
- Ensure coordination with all relevant national stakeholders
- Establish a National Committee, if necessary
- Remain aware of national institutions taking part in activities related to denial of shipments
- Develop a list of contacts

Flexibility of means, efforts and structures to be put in place by a NFP should be commensurate with the volume and complexity of reported denials/delays and be adapted to the importance and complexity of denials to be handled.

Part 1 – National Network



Part 1 – Networks

International Steering Committee (ISC)

- Headed by the Management Team
- Membership
 - ~ 40 members : > 20 countries represented
 - + Denials Secretariat (IMO, IAEA, ICAO)
 - + governmental and non-governmental organizations
 - + industry and associations
- Mandate
 - To develop and coordinate a comprehensive Action Plan which will facilitate the global transportation of radioactive materials

Summary Part 2 (Action Plan)

ACTION PLAN

- Definition of a denial
- Reporting process
- Database
- Action Plan

Part 2 – Definition of a Denial

- In the frame of roles and responsibilities definition of NFP, a denial is “***a (explicit or implicit) refusal to carry out a radioactive shipment though it conforms to all the applicable international AND national regulations***”.
- Then, the non-compliance of Regulations CANNOT lead to Denial Reporting/Notification.
- The explicit definition of delay still needs to be developed.

Part 2 – Reporting Process

Step 1 (for Industry (Shipper / Consignor))

- Inform promptly on ID&D when difficulty arises

Step 2 (for NFP)

- Identify / Validate reported ID&D and Find solution to ID&D

Step 3 (for NFP, and RC and ISC)

- Coordinate / communicate at national-regional-global level on solution of ID&D

Step 4 (for Denials Secretariat)

- Feed database with new reports
Perform analysis of new database inputs

ID&D: Instance of Denial and Delay

Part 2 – Reporting Process

- Reporting forms (available under <http://ns-files.iaea.org/fileshare/rit/default.asp?fd=774> and <http://www-ns.iaea.org/tech-areas/radiation-safety/denial-of-shipment.htm>)
- Crucial importance of industry to relay instances of denials and delays
- Identify the causes of Delays and Denials before searching for the underlying root causes.

Part 2 – Database

- Database Origin
 - The General Conference resolution GC(51)/RES/11 of September 2007 urged the Secretariat to develop a database on incidents of denials.
 - The IMO subsequently developed a suitable amendment to their database that is jointly administered by the IMO, ICAO and IAEA.
 - Global Integrated Shipping Information System (GISIS) of IMO (<http://gisis.imo.org/Public/>) amended to include the Dangerous Goods Carriage Difficulties database (since 2008)

Denial Database - Login

IMO Web Accounts - Microsoft Internet Explorer provided by IAEA

https://www.imo.org/WebAccounts/Common/WebLogin.aspx?App=GISISMembers&AD=false&ReturnUrl=https://gisis.imo.org/Members/Default.aspx

File Edit View Favorites Tools Help

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INTERNATIONAL MARITIME ORGANIZATION

Web Accounts

Global Integrated Shipping Information System (GISIS)

Please log in below for access to Members' Area.
(For the **Maritime Security** module, please [click here.](#))

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Username:

Password:

Log In

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Done Internet 100%

Denial Database - Login



Web Accounts

Authority: IAEA
User: dcrowley
[Log out](#)

My Web Account

Personal Information

David Crowley
d.crowley@iaea.org
[Change password](#)

My Services

- [GISIS Members' Area](#) - Global Integrated Shipping Information System

Denial Database - Login


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Global Integrated Shipping Information System


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




Recognized Organizations [Public](#)
Information submitted by Member States under MSC/Circ.1010-MEPC/Circ.382.




Port Reception Facilities [Public](#)
Data on the available port reception facilities for the reception of ship-generated waste.




Simulators [Public](#)
Information on simulators available for use in maritime training.




Greenhouse Gas Emissions [Public](#)
Based on the *Interim Guidelines for Voluntary Ship CO₂ Emission Indexing for Use in Trials* (MEPC/Circ.471).




Ship Database
Ship identification and particulars.




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




Maritime Casualties and Incidents [Public](#)
Data on Maritime Casualties and Incidents as defined by circulars MSC-MEPC.3/Circ.1.




Pollution Prevention Equipment [Public](#)
Pollution prevention equipment required by MARPOL 73/78.



Contact Points [Public](#)
Electronic database for Contact Points.



Dangerous Goods Carriage Difficulties
Reports on difficulties encountered in relation to the carriage of IMDG code dangerous goods including class 7 radioactive materials.



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Denial Database - Disclaimer

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Global Integrated Shipping Information System

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Denial Database – Front Page

The screenshot shows the front page of the IMCO GISIS: Dangerous Goods Carriage Difficulties website. The page has a blue header with the IMCO logo and navigation links. Below the header is a breadcrumb trail and a menu. The main content area features a title, a brief description, and a list of links for users to interact with the database. The footer contains copyright information and legal links.

IMCO INTERNATIONAL MARITIME ORGANIZATION

GISIS: Dangerous Goods Carriage Difficulties

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Members' Home > Dangerous Goods Carriage Difficulties

Search Analysis Synopsis Submit New Report

Dangerous Goods Carriage Difficulties

Reports on difficulties encountered in relation to the carriage of dangerous goods including class 7 radioactive materials.

Please select from the following options

- [Search/edit/download difficulty reports](#)
- [Submit a new difficulty report](#)
- [View analysis of data](#)

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Denial Database - Search

IMO INTERNATIONAL MARITIME ORGANIZATION

GISIS: Dangerous Goods Carriage Difficulties

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Members' Home > Dangerous Goods Carriage Difficulties > Search DGCD Database

Search Analysis Synopsis Submit New Report

Go to Public Area

Search for DGCD Reports

Please enter a search condition.

Reference contains Add

Search >

Total records: 190 Download >

Showing 91-100 of 190 Page 10 of 19

Reference ↑	Product ↓	UN Number ↑	Carrier ↑	Type ↑	Status ↑	
D00094	Iodine 131	2915		Delayed	Received	VIEW
D00095	FDG - FLUORDEOXIGLICOSE (FDG)	2915		Delayed	Received	VIEW
D00096	FDG - FLUORDEOXIGLICOSE (FDG)	2915		Delayed	Received	VIEW
D00097	FDG - FLUORDEOXIGLICOSE (FDG)	2915		Delayed	Received	VIEW
D00098	FDG - FLUORDEOXIGLICOSE (FDG)	2915		Delayed	Received	VIEW
D00099	FDG - FLUORDEOXIGLICOSE (FDG)	2915		Delayed	Received	VIEW
D00100	Gamma chamber 5000 unit containing radioactive material	2916		Denied	Received	VIEW
D00101	Gamma chamber 5000 unit containing radioactive material	2916		Delayed	Received	VIEW
D00102	Gamma chamber 5000 unit containing radioactive material	2916		Denied	Received	VIEW
D00103	Cobalt-60	2916		Denied	Received	VIEW

Denial Database - Synopsis

IMCO INTERNATIONAL MARITIME ORGANIZATION

GISIS: Dangerous Goods Carriage Difficulties

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Members' Home > Dangerous Goods Carriage Difficulties > Synopsis

Search Analysis Synopsis Submit New Report

Synopsis

Download Synopsis »

Reports Products Consignors Consignees Carriers

Number of reports
190

Conveyance modes Name of entity with whom the alleged difficulty Type of difficulty Reason stated Actions taken

Reason stated	Count
Carrier	148
Port or Port Authority	22
Regulatory	13
Others	7

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Denial Database – Submit New Report

IMCO INTERNATIONAL MARITIME ORGANIZATION
GISIS: Dangerous Goods Carriage Difficulties
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Authority: IAEA
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Members' Home > Dangerous Goods Carriage Difficulties > Reports
Go to Public Area

Search Analysis Synopsis **Submit New Report**

Report Details

Submitter details

Date of report submission: Name:

Position:

Organization: Street:

District / Town: Post Code:

Country:

Telephone number: Email:

Product details

Select ▲ Retrieve product details from the database

Product name: UN number:

Proper shipping name: Class or division:

Consignment details

Consignor: Consignee:

Carrier:

Shipment reference number:

Conveyance details

Conveyance mode:

Vehicle name:

Vehicle type: Vehicle number:

Route reference:

Origin and destination

Origin: Country: Town: [Please enter other location below](#)

Destination: Country: Town: [Please enter other location below](#)

Other locations

Loading location

Country: Town: [Other location](#) Date: [ADD](#)

Transits

Country: Town: [Other location](#) Date: [ADD](#)

Difficulty location

Country: Town: [Other location](#) Date: [ADD](#)

Details of difficulty

Type of difficulty:

Entity involved:

Part 2 – Database

- **Quality of information and translation**

- Inputs verified by the Denial secretariat to avoid discrepancies.
- The quality of these inputs are mainly related to:
 - Identification of the denial or delay,
 - its justification,
 - its underlying issues,
 - how it could be solved
 - at which level (national, regional or global)
 - by providing the relevant assistance (training, communication kit, etc).
- The IMO subsequently developed a suitable amendment to their database that is jointly administered by the IMO, ICAO and IAEA.
- Portuguese and Spanish versions of the denial report form available in Latin America.
- an English version needed by the Denial Secretariat to introduce the report into the database.

Part 2 – Database

- **Confidentiality and access**
 - Database has a password restricted access
 - Limited access to the Denials Secretariat
 - In the future, graded access to the database:
 - Access (in reading) for any individual of the new structure to basic data on instances, without compromising the confidentiality of industry related information.
 - Access (in writing and reading) for the Denials Secretariat to the complete database.

Part 2 – Database

- **Confidentiality and access**

- Main concern for industry (no reporting!)
- Access restricted to the Denials Secretariat to encourage industry to report
- in 2010, IAEA Secretariat informed that around 50 reports per month were not being registered because of confidentiality issues
 - shipments of radiopharmaceuticals in 2009
 - in only 3 European countries, where no other denial is reported.
- Lack of trust in the tool
- Respect of the confidentiality statement (by Denials Secretariat).

Part 2 – Database

- **Analysis and outputs**
 - Analysis of the database
 - (every 6 months) by IAEA depending on funding.
 - oriented to assist the ISC or regional networks, or eventually other international organizations on request.
 - The number of reports not be used as an indicator of occurrence
 - The quality and the impact of the actions taken to correct the situation are determinant.

Part 2 – Database

Reasons for Denials: Findings

- ***Negative perception*** about radiation - lack of awareness & information of the industry
- Concerns of ***cost and extent of training*** of those who handle radioactive materials
- ***Multiplicity and diversity of regulations*** governing handling, use and transport of RAM;
Lack of harmonization between Member States.
Result: duplicative, overlapping and sometimes contradictory regulatory requirements
- ***Lack of outreach*** with resultant ***Lack of public awareness*** about the need & applications of RAM, and the extremely stringent regulatory environment in which they are managed

Part 2 – Action Plan

- **2010 Database Analysis**

- 190 reports of instances (GISIS) (**partial picture**)
- 129 are denied shipments and 61 delayed shipments
- Identified trends (depending on the available reports):
 - delays concern mainly air transport (about 25% of the reports)
 - denials concern mainly sea transport (about 70% of the reports).
 - Causes for the delays and denials are related to carriers (72%), ports (8%), and regulatory bodies (4%).
 - The largest fraction (about 45% of the reports) concerns Cobalt 60 shipments, followed by NORM (20%).
 - Hundreds of shipment difficulties from radiopharmaceutical industry not reported to the denial database.

Part 2 – Action Plan

- **Building and updating the Action Plan**
 - **ISC responsibility: to develop and coordinate a comprehensive international action plan of activities related to delays and denials of shipments of radioactive material at both national and international levels**
 - **The action plan includes items which would significantly reduce cases of denial of shipment and alleviate the hardships due to denial and delay by**
 - 1/ Reaching out to the concerned organizations and increasing awareness**
 - 2/ Harmonizing national and international regulations,**
 - 3/ Ensuring coordination among regulators within a State**
 - 4/ Providing training and other educational programmes**

Part 2 – Action Plan

- **Building and updating the Action Plan**

The Action Plan is based on six areas of work

1/ **Awareness**

2/ **Training**

3/ **Communication**

4/ **Lobbying**

5/ **Economic**

6/ **Harmonisation**

Part 2 – Action Plan

Denials Handbook

- Updated action Plan through ISC5 meeting (02/2010)
 - Number of actions significantly reduced
 - Extraction of on-going activities
- Denials Handbook available under <http://ns-files.iaea.org/fileshare/rit/default.asp?fd=774>

Summary Part 3 (Future Challenges)

FUTURE CHALLENGES

- Why fighting / combating denials?
- Why such a structure?
- Global improvements
- Future concerns

Part 3 - Why fighting / combating denials?

- **In compliance** with the international standards and regulations
 - The non-compliance with Regulations **CANNOT** lead to Denial Reporting.
- **For medical reasons**
 - Transport of radioactive materials has a humanitarian impact
 - Denial of shipments has a direct link to individuals receiving
 - treatment for cancer,
 - diagnosis (Mo99)

Part 3 - Why fighting / combating denials?

- **Sustainability of transport**

- For a shipper, it is always possible to ship, it depends on the cost.
- Nevertheless impossible because of a clear refusal to make use of the carriers' service
- Long term dedicated routes
- should it be necessary to request from the Member States to have at least one harbour and an airport clearing class 7 cargoes per country or per region for large countries?

Part 3 - Why fighting / combating denials?

- **Sustainability of transport**
 - NFPs in their responsibilities are in charge of
 - Collecting the applicable Regulations in their countries and to identify discrepancies with the international standards.
 - Identifying all harbours and airports clearing class 7 cargoes and the related conditions, and to identify the maritime companies and airlines concerned by these shipments.
 - The sustainability of the transport is a complex equilibrium between the continuity of the commercial activity and the permanent readiness of the transport infrastructure to accept these cargoes.
 - Facilitating the solving of instances of denials and delays of shipment of radioactive material is a **fundamental contribution** to the sustainability.

Part 3 - Why fighting / combating denials?

- **Sustainability of transport**
 - Take profit of the existence of the new organizational structure (with 3 levels networks) for combating denials and delays to use it
 - Subject to continuous reporting
 - The IAEA is hosting an **International Conference in 2011** (31 October 2011 - 4 November 2011) on Transport Safety and Security: the Next Years of Transport - Creating a Safe, Secure and Sustainable Framework transport of radioactive material.

Part 3 - Why fighting / combating denials?

- **Cases of successes**

- Most visible and communicative part of the facilitation process
- the Brazilian Regulatory code for Civil Aviation was amended with a clause that radioactive material for medical use has obtained the **status of priority cargo** both for passenger as well as for cargo flights.
- In the sea mode, substantial **changes of policy** at the Santos harbour (also in Brazil) have been noted following intensive information, education and training of the port staff.

Part 3 - Why fighting / combating denials?

- **IAEA concerns**

- The Deputy Director General (DDG) Taniguchi challenged the Committee during the 5th ISC meeting to accept working toward **a goal of making sure denial of shipment would be reduced to a level not worthy of reporting by 2013.**
- To attain this goal, the crux of the solution to denial of shipments is in developing strong National and Regional Networks.
- The next steps will be to ensure; the **sustainability of the transport** of radioactive material and the **harmonization of applicable Regulations**, through a compliance assurance process.

Part 3 - Why such a structure?

- **New structure for facilitating**
 - May appear complex and oversized
 - Does create networking in the field of transport of radioactive material
 - Key to success for activities related to compliance assurance and resources sharing (test facilities, appraisal, ...)
 - To be used for other purpose.
 - Requests (vital) involvement of the MSs and UN bodies at political level to maintain such a structure.

Part 3 - Global improvements

- **Available tools**

- New organizational structure (individuals, groups of facilitation (with clarified roles and responsibilities))
- Toolkits
 - Communication toolkit
 - Denials Handbook
 - IAEA Web pages: PROgress in Transport of RadioActive Material (**PROTRAM**) covering at least the facilitation of instances of denials of shipment and the sustainability in transport of radioactive material for denials.
 - IMO dedicated webpage on denials of shipment of radioactive material.

Part 3 - Global improvements

- **Available tools: Facilitation**

- Facilitation Committee (FAL) of IMO for “facilitation of difficulties”
International Steering Committee (ISC) of IAEA for “Solving denials of shipment”
- “turn denial into facilitation”
- **Similar approach** on communication vehicle = dissemination of the related information through :
 - identification of successes (“top stories” or telling stories).
 - an effective reporting process
 - a periodically updated database, outputs of the reports (especially with roots and roots causes identification)
 - a periodic analysis of the database
 - accurate orientations to solve the (generic or local) instances of denials and delays.

Part 3 - Global improvements

- **Training and awareness**
 - **Training modules** under completion for all concerned targets (regulators, carriers, consignors, consignees, ...).
 - **e-learning package** developed on the initiative of IMO for all modes of transport
 - free of cost for non commercial use
 - 2 different levels: awareness and training.
 - available under <http://www.class7elearning.com/>
 - endorsed by both IMO and IAEA
 - considered to be a powerful tool for accessible self training for carrier employees.
 - Spread sheet for **evaluating costs of denials**
 - **Fact sheets** on transport of dedicated radioactive material

Part 3 - Global improvements

- **Harmonization**

- National deviations and disparities in the regulatory requirements and practices,
 - appear to be minor,
 - can have a major impact on trans-boundary transport of radioactive material in terms of the extra effort, time and (technical/financial) resources required by transport operators to comply with the specific national duties and requirements.
 - represent a major regulatory burden for shippers and carriers involved in international radioactive material transport operations
 - Increases the potential for non-compliances and shipment denials.
 - the new organizational structure and reporting process constitute a strong tool for identifying these discrepancies

Part 3 - Global improvements

- **Harmonization**

- Member states should **have a necessary and (but) sufficient level of safety** = IAEA international standards.
- If the intent were to **provide the highest level of safety**, the Regulations would not be applicable by most of the countries and the international transport would be simply impossible.
- Ex: addition of extra national requirements like systematic vessel or carrier or shipment licensing appears to be a particular source of denials and delays.

Part 3 - Global improvements

- **Harmonization**

- Reminder: the prerequisite for allowing the international transport of radioactive material was to have a **unique source** of requirements for the safe transport of radioactive material.
- A simple way of **limiting discrepancies** between national and local Regulations and International standards would be to invite Member States to submit amendments proposals to international standards before implementing them deliberately into their own Regulations.
- Would lead to the harmonization in the implementation of the safety requirements.
- As a minimum, Member States should be able to **identify any difference from the international standards and should publicize them.**



Part 3 - Global improvements

- **Capacity building and networking**
 - Networking with multiple applications
 - the same individuals are dealing with all the topics related to the transport of radioactive material
 - Exchange of experiences and best practices
 - A topic worth developing for the sustainability and durability of the structure.

Part 3 – Future concerns

- **More Involvement of Member States**
 - with the nomination of NFP by MSs (69 on 151)
 - with the building of National Networks (ISC decision of February 2010);
 - with sharing knowledge related to denials (with the creation of webpage and National Networks);
 - with reporting **actively** and participating in facilitating and solving instances of denials.

Part 3 – Future concerns

• Involvement of Industry

- Industry is under represented in the circle of NFPs, and in the arena of the International Steering Committee.
 - A simple reason, consequences in terms of competition.
 - The main issue is confidentiality.
- Larger representation of industry and greater involvement should be promoted for the ISC and in the networks. This would ensure balance within the structure.
- **It is the responsibility of industry to report denials,** as first involved, and moreover when the most direct transport routes remain unavailable.

Part 3 – Future concerns

- **No report equals no denial**
 - Doubts on denials are recurrent (competent authorities)
 - Confidentiality issues are behind a strong reluctance to report.
 - Some NFPs, as regulators and civil servants, may feel a problem of reporting and facilitating.
 - Recurrent oral reporting of concern related to denials and delays in several meetings organized by international bodies (IMO, OECD, IAEA with BoG and GC).
 - Nevertheless, **very few reports have been written to give evidence of this concern.**
 - Lack of reporting and creating Network may lead to the **desegregation of a tool at the service of all actors** of the transport of radioactive material (industry, Member States and international associations and organizations).
 - 2010 conferences feedback: few participants in the nuclear field (e.g. reactors operators, international nuclear related associations) aware of the existence of the reporting process.

Part 3 – Future concerns

- **Works to be addressed**
 - Database
 - 2 levels of access;
 - consistency of data introduced in the database
 - Dedicated IAEA web pages as mirror of activities provided through the networking
 - all available toolkits, all records of the different meetings and workshops, top stories on successes, and any further communication material
 - Consolidation of the new organizational structure (with feedback on Networks building)
 - The question of funding the work at ISC and regional levels is recurrent and will need to be solved.

Conclusions

- **5th ISC and 1st NFP meetings (02/2010)**
 - IAEA recorded plenty of achievements related to facilitating the solving of instances of denials and delays
 - New organizational structure with
 - the facilitation groups (networks) and
 - the clear definition of the roles and responsibilities of the individuals (NFPs, RCs)
 - The clarified role of Denials Secretariat
 - Action plan
 - updated by providing a rough cleaning of all on-going activities.

Conclusions

- **5th ISC and 1st NFP meetings (02/2010)**
 - Agreed reporting process with the reporting form.
 - Toolkits made available,
 - Denials Handbook developed for all stakeholders within the structure of the ISC,
 - A communication toolkit.
 - Database
 - All inputs of reports revisited in database for consistency
 - Synopsis provided
 - Access restricted for confidentiality reasons.

Conclusions

- **Looking forward**

- IAEA responsibility to provide a **structure for networking** at global level for the transport of radioactive material, with a special focus on facilitating denials of shipment.
- The **quality of the networking and its outputs** rely mainly on the involvement of the Member States to create and maintain National Networks, and to some extent Regional Networks.
- **Industry is encouraged** to report and to bring more evidence of a phenomenon recurrently reported by Member States in various international meetings.
- **Having no report of denials and delays is synonymous to having no denials and delays**, and may endanger the existence of the created structure for facilitation.



Conclusions

- **2011 IAEA Meetings**
 - **TM for Communication Strategy for Denials of Shipment – 17-21/01/2011**
 - **CS to develop brochures aimed at carriers – 24-28/01/2011**
 - **TM to prepare a simplified training and e-learning package targeting denial – 28/03-01/04/2011**
 - **CS to analyse of denial reports – 11-15/04/2011**
 - **5 CS - Meeting of Regional Network co-ordinators - 18-21/04/2011**
 - **2nd Meeting of national focal points for denial of shipments – 18-19/04/2011**
 - **6th International Steering Committee Meeting on Denial of Shipment – 20-21/04/2011**
 - **CS of Management Group meeting for Steering Committee (during GC) – 12-16/09/2011**
 - **CS to develop brochures aimed at carriers – 26-30/09/2011**



WORKING TOGETHER