



COMDTPUB 16700.4
NVIC 8-00
June 22, 2000

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 8-00

Subj: NVIC 8-00, GUIDANCE REGARDING ENFORCEMENT OF THE INTERNATIONAL CONVENTION FOR SAFE CONTAINERS (CSC), 1972, FOR FREIGHT CONTAINERS WITH ONE DOOR REMOVED

1. PURPOSE. The purpose of this Circular is to provide guidance regarding the transportation of commodities in existing and new freight containers meeting the CSC construction and inspection requirements, where one door has been specifically removed from a container design to provide extra ventilation for general cargoes being transported. The action of physically removing one of the aft doors of a two-door CSC approved freight container is considered a modification to the existing container design, unless the unit was initially tested for such transportation operations as required by the CSC approval regulations. In such cases where a freight container was built for dual operation (one-door-off and two-door operation), the CSC Approval Plate attached to the container's door would be marked to show the minimum allowance for use in one-door or two-door transportation operation.
2. DIRECTIVES AFFECTED. None.
3. BACKGROUND.
 - a. During 1998, the U.S. Coast Guard Marine Safety Offices in the northwestern ports of the United States recognized that existing CSC freight containers were being modified by having one door removed when carrying general cargoes of fruits, vegetables and plants. In place of the container door, spaced wooden battening materials were secured to allow openings for extra ventilation needed for the cargoes to remain fresh. This eliminated the need for refrigerated freight containers. It was recognized that this practice of removing a door from an existing container, required a determination as to whether the freight container design needed to be re-tested due to such a modification, as discussed in regulation 11 of the CSC. Meetings were held with representatives of container owners, lessors and port authorities to discuss the consequences of this

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practice and the needs of the producers to export their products.

- b. During these meetings and discussions with the maritime industry, a major U.S. freight container owner volunteered to complete CSC re-testing of a number of existing containers with one-door-off modifications. Specifically, these existing containers would be tested regarding their capabilities and limitations for meeting CSC stacking and racking requirements. During the time these tests were being completed, Commandant (G-MSO) issued a letter of policy that the transportation of goods in one-door-off containers could continue unhampered, if:
 - 1) these existing freight containers had their CSC Approval Plate in clear sight on the remaining attached aft door of the container; and
 - 2) these existing freight containers used in one-door-off operations were only top-stowed in container stacks on vessels, where there would be little if any racking or stacking stresses placed upon them.

4. DISCUSSION

- a. Testing completed on existing containers with one door removed, showed that the container could not meet the stacking and racking test criteria of the CSC, for approval of unrestricted use in a one-door-off cargo transport operation. As a result, existing containers will not be allowed to operate in one-door-off operations for transport of cargoes unless they have been re-tested for a one-door-off modification, and the CSC Approval Plate is marked showing any operational limitations of the container used with one door removed.
- b. Industry is designing, constructing and replacing existing containers with newer freight container designs which have passed one-door and two-door test requirements. These newer designs are marked on their CSC Approval Plates indicating their capabilities in either transport configuration.

5. ACTION.

- a. All container owners, lessors and container vessel operators shall ensure that any freight container placed in international transport operations will at all times have a visible CSC Approval Plate on an aft door of the freight container which properly displays the unit's minimum safe transportation capabilities. Any modification to a CSC approved freight container will require that the container design be re-tested to ensure that the modifications have not weakened the original design capabilities and the container design meets the CSC marked minimum operation standards shown on its CSC Approval Plate.
- b. If an existing CSC approved freight container, that has not been tested for operation with one door removed, is placed in one-door-off transport operations, it may be allowed for use only if top-stowed on the vessel. If the CSC container modification

testing for one-door operation has been completed, it should be ensured that the modified freight container design is noted on the freight container's CSC Approval Plate for both two-door and one-door transport operations. This allowance will affect only an existing CSC approved general freight container built and delivered before June 1, 2000. This allowance for one-door-off operations can only be used when an existing container is transporting fruits, vegetables or other general produce cargoes, and proper dunnage is secured in the open door space at the aft end of the container so cargo cannot fall out. Such an allowance will not be recognized on any existing freight container for the transportation of dangerous goods or liquids of any kind.

- c. A new container, i.e., those units constructed and delivered on or after June 1, 2000, shall not be allowed this variance to the CSC modification requirements. A new freight container shall be tested for one-door-off operation and have its CSC Approval Plate marked with the minimum operational requirements, or the container will be detained for non-compliance with the CSC for international transportation of goods under 49 CFR part 453.
- d. Cognizant U.S. Coast Guard Officers In Charge, Marine Inspection (OCMIs), and Captains of the Port (COTPs), shall ensure that this allowance for one-door-off transportation use of an existing CSC approved freight container is given the widest dissemination, especially during industry days and within safety office newsletters.

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