

German comments on NWI proposal  
*“Reusable Multi-Functional Electronic Seals for Freight Container”*

Key items for disapproval of the Chinese New Work Item proposal:

In accordance with Customs philosophy, a seal is not allowed to be re-usable. Accordingly, a re-usable eSeal cannot replace the conventional seal according to ISO 17712 or according to ISO 18185.

In case of demand for information to be stored in an RFID tag attached to the Container, the so-called Shipper Tag according to ISO 17363 should be used.

The question whether it makes sense to have cargo-related information available on board of the container, was discussed several times. The conclusion of these discussions was that container transports having such information on board will most likely be less safe. And, there will be no logistic advantages as long as the question of administration of data is not solved.

For all other container-specific information, such as Container number, the licence tag according to TS 10891 should be used.