

Template for comments and secretariat observations

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of comment <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted
GB		All	Ge	<p>China submits that the existing ISO e-seal standard (ISO 18185) is deficient and does not meet identified needs of shippers, ocean carriers and marine terminals (collectively referred to as "logistics' development") or governments. They further submit that there is a demand for "real-time online monitoring system for the whole process of container logistics. [which] will not only raise the efficiency but also the security of container transportation, and all the links of the container logistics, such as cargo owners, shipping companies, ports, logistics companies, the Customs, border protection, commodity inspection and so on, can benefit from this system".</p> <p>This is at odds with the fact that China participated actively in the multi-year development of the existing ISO 18185 e-seal standard, and voted in support of its approval and publication. In doing so they did not identify "needs" that would not be met by the e-seal standard and the accompanying shipment tag standard (ISO 17363) that is intended for use by shippers and importers who, at their discretion and responsibility, may wish to upload supply chain and other logistics information into a tag (which may be reusable) to be affixed to the container. We are not aware of subsequent developments that would seem to indicate the emergence of a commercial demand for a reusable multi-functional e-seal with the characteristics and capabilities contemplated in the Chinese new work item proposal.</p> <p>In addition , ISO 18185 was developed with a view to having an RFID-based, automatic seal reading capability available in the event that the U.S. Government should promulgate a seal verification rule. Subsequently, the U.S. Government has announced publicly that it is no longer pursuing such a seal verification rule. No other governments have announced intentions to introduce</p>		

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2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

**NOTE** Columns 1, 2, 4, 5 are compulsory.

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				<p>such a rule. Thus, the proposed reusable multi-functional e-seal would not seem to address any identified government security needs, requirements and objectives.</p> <p>The purpose of an ballot on a proposed new work item proposal is to determine whether a need or demand (commercial and/or governmental) exists in support of the development of an ISO standard for the proposed application. Only when such a need or demand can reasonably be said to exist should the proposed new work item be approved. Since no demand apparently exists the Work Item does not meet the criteria and should not be approved.</p>		

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