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**Group of Experts for the revision of the IMO/ILO/UNECE  
Guidelines for Packing of Cargo Transport Units**

**Second session**

Geneva, 19-20 April 2012

Item 3 of the provisional agenda

**Updates on the 1st draft of the Code of Practice (COP)**

**Comments (Sweden) submitted on the Code of Practice for  
packing of Cargo Transport Units (CTU Code)**

**Note by the Secretariat**

1. Per the Secretariat request on 21 March, 2012 to the Group of Expert on submitting comments and suggestions on the circulated draft COP in advance to the second session of the Group of Experts (19-20 April, 2012), the Group of Experts may wish to consider the proposal of Sweden reproduced below, and decide as appropriate.

## **Swedish comments on the draft Code of Practice for packing cargo transport units**

Firstly, Sweden would like to thank the coordinator for his dedicated work with the first draft of the Code of Practice for packing cargo transport units (CTUs). The provided material is really comprehensive and with the ambition to create a complete code that takes everything into account.

In spite of the fact that we all agreed on the outline of the code in December, Sweden would like to suggest some changes in the outline of the code to get a more user friendly material with clear technical standards. It should be noted that a Code of Practice are intended to assist governments in drawing up regulations and that it could be used as a model for national legislation. On the other hand, a guideline aims to provide more broad orientations. In this case, we feel that the draft COP is more like a guideline and that the technical design criteria regarding acceleration, friction and safety factors are not clearly stated.

With that said, some limitations regarding the content of the code have to be drawn so we all can agree on a reasonable level of ambition.

The proposed outline from Sweden is based on the existing IMO/ILO/UNECE Guidelines as well as our own national regulations, for both sea and road transports, that came into force for over 15 years ago and has been proved to be very successful.

### **Proposal outline for the COP**

#### **Main chapters**

- Introduction
- Consequences of badly packed and secured cargo
- Responsibilities
- General design criteria
  - Accelerations (according to the existing guidelines MSC/circ.787)
  - Frictions (according to the IMO model course 3.18)
  - Safety factors (according the CSS-code A.714(17))
- CTU properties
- CTU suitability
- Before packing CTUs
- Packing and securing cargo
- Additional advice on the packing dangerous goods
- On completion of packing
- Basic principles for the safe handling and securing of CTUs (according to chapter 6 in the existing guidelines MSC/circ.787)
- Advice on receipt and unpacking of CTUs
- CTU deficiencies (proposed to be implemented in the chapter regarding CTU properties)
- Training

#### **Annexes**

- Acronyms
- Definitions

- Avoiding condensation
- Practical design code ("Quick lashing guides" according to IMO model course 3.18)
  - Lashing guides
  - Practical tests to determine the friction
  - Practical tests to verify cargo securing arrangements