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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 (Slovakia) 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 from Slovakia reproduced below, and decide as appropriate.

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

Slovakia would like to thank for comprehensive first draft of the document presented. We have following comments, questions and suggestions to the code.

1.3.3 This document is a non-regulatory Code of Practice which means that the Code is not backed by an international convention or regulation.

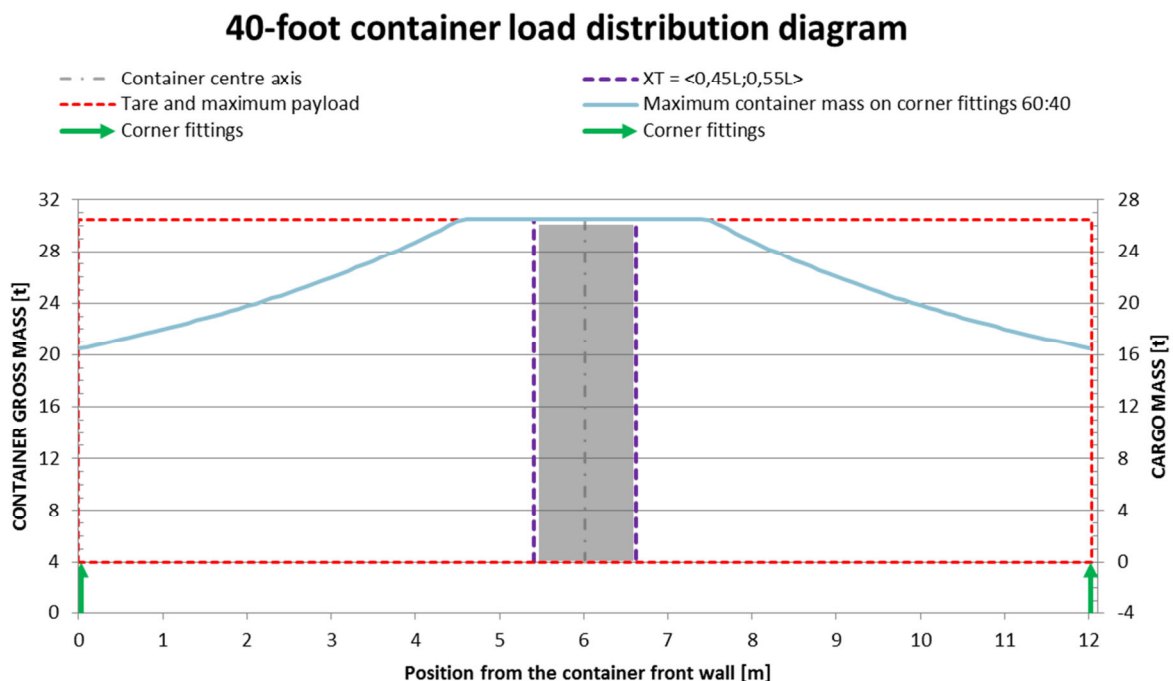
What is the aim of CTU Code shall be discussed and how references in IMDG, ADR, RID, ADN will be changed with new CTU Code?

Shall the CTU code be observed for dangerous goods or any cargo or is only as a packing manual?

2.2 Planning, 11.10.7 Load distribution

As it is not clear in current CTU guidelines nor in ISO 3874 the position of center of gravity in CTU longitudinal axis we suggest to clearly define that the center of gravity shall be within the boundaries of 0,45 L to 0,55 L (L - loading length). This limitation is very important for the operators how to place containers on vehicles or railway wagons not to overload axles.

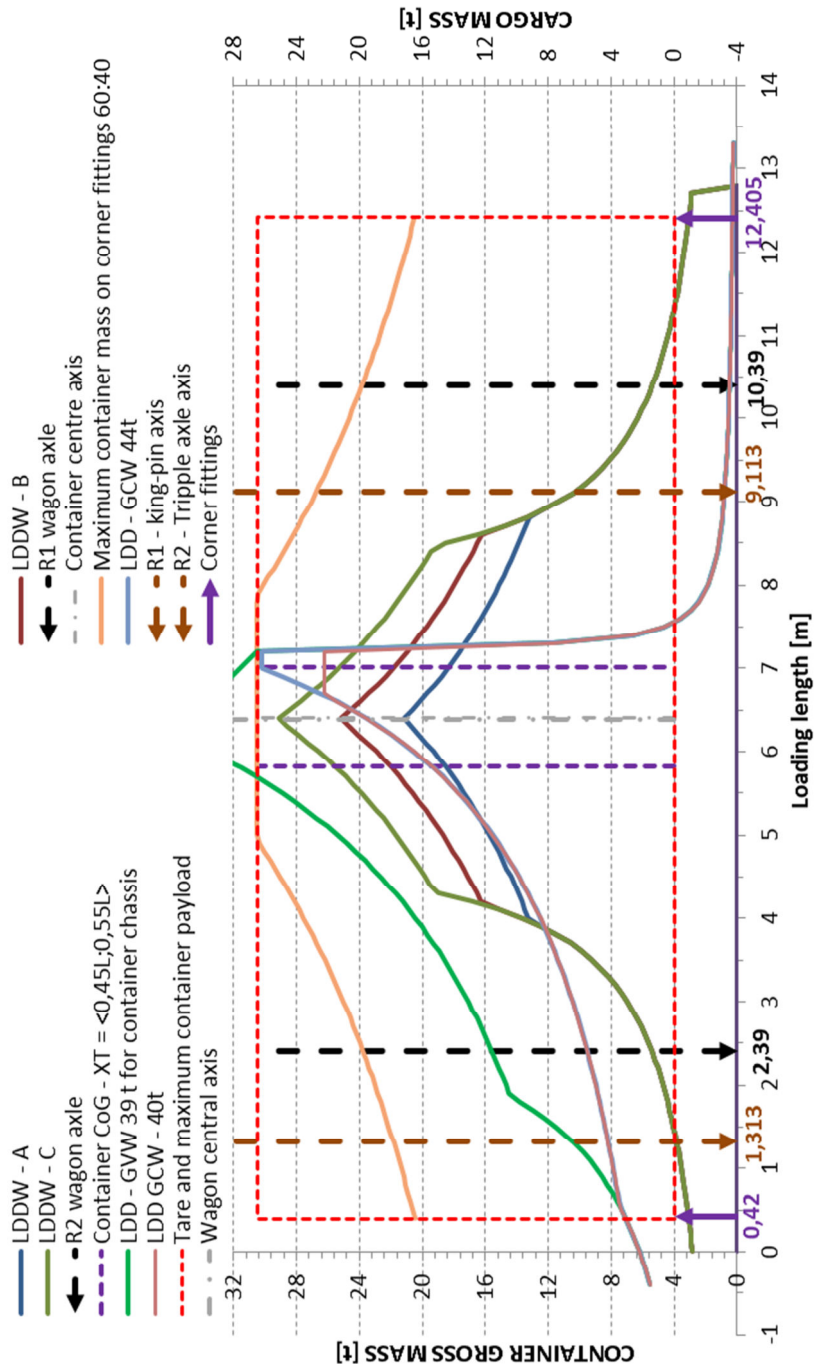
The load shall be distributed in a way not exceeding 60% of mass in a container half according to the standard ISO 3874. This gives the eccentricity of the cargo centre of gravity 5% of loading length (L). Within the application of the rule container load distribution diagram can be constructed as example below.



Author: Juraj Jagelčák

Load distribution diagram of 40-foot container (Tare – 4000 kg, Gross mass – 30480 kg)

Load distribution diagram of vehicle mentioned in 11.10 is not enough to correctly stow the load in longitudinal axis for road, rail and sea transport. Therefore we suggest Intermodal load distribution diagram, where load distribution diagram of container, container wagon and container chassis are combined as an example below.



Author: Juraj Jagelčák

Load distribution diagram of 40-foot maritime container loaded on two-axle Lgs container wagon and container chassis

According to our opinion the packer will not construct load distribution diagram, therefore this information is not necessary in the code in 11.10.4. Different curves are used for railway wagon.

Formula for the calculation of total centre of gravity of loaded cargo (in longitudinal or also in transverse and vertical axis) and example of such calculation would be helpful for packers.

3.1.9 Derailment example

Derailment is an accident for which the load securing in the container is not designed according our knowledge, therefore this is not good example in the CTU code according to our opinion.

3.3.2 Consignors and packers are required to declare that the mass stated on the shipping documentation is correct and that it complies with any weight restriction:

What kind of declaration it will be shall be discussed? Shall each consignor/packer find out the container weight?

3.4 Concentrated loads

It shall be mentioned how to support e.g. steel coils of different weights in relation to payload with two timber or other supports with different longitudinal length and transverse distance between them. This is usual method hot to spread pressure in containers.

11.4 Accredited Packer

There are lot of companies in the world loading CTU's which don't have accredited packers.

The position of accredited packer shall be discussed as follows:

- Does each company loading CTU shall need accredited packer?
- Who can provide approved training package?
- Who certifies international recognised and accredited training programme for packers?
- Who assigns unique identification reference to be used on packing documentation?
- Shall container packing certificate for dangerous goods be signed by an accredited packer?

11.8.6 Lashing chains

Rule of thumb for chains of class 10 and 12 is also possible to present.

11.9 Basic principles for packing and securing

Stowage methods included illustrated by pictures are easier to understand. Not all of them include the pictures.

General suggestions

- Design accelerations for sea transport shall be divided to sea areas based on significant wave height.
- The table of friction coefficients of usually used combinations shall be included in the code for the design of cargo securing arrangements.
- The methods of the determination of friction coefficients shall be included in the code.

- The methods of the testing of cargo securing arrangements shall be included in the code. Which methods can be used for intermodal transport shall be discussed and explained.
- We suggest that a summary table of securing equipment with different MSL and safety factors shall be included as an annex of the code.
- The calculation of design requirements of timber blocking shall be included.
- Practical design guides shall be included in the code to design cargo securing arrangements in practice.
- The content of the code shall include technical design criteria as accelerations, friction and safety factors.