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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 (Japan) 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 Japan reproduced below, and decide as appropriate.

Comment of Japan to document EG GPC No.3 (2012)

1. General Remark

The delegation of Japan thanks the coordinator for preparing the first draft and considering our proposal in the last meeting. As described in “3.0 Consequences of badly packed and secured cargo”, the packing code shall set out necessary provisions for the purpose of securing safe intermodal transport and ensuring that cargo within a CTU reaches its destination in a proper state.

In particular, with regard to securing the safe transportation of CTUs, CTU information including description of cargo, total weight and packing condition, etc in CTUs should be circulated down to driver and/or carrier of CTUs, so that the driver drives at a safe speed and appropriately handles the CTU during its transport according to CTU information. In addition, this information would help logistic company to select the appropriate manner to carry the CTU.

The delegation of Japan herewith introduces the basic concept for “Chain of responsibilities” and “Chain of information” as material for developing the COP draft.

2.1 Basic Concept for “7.0 Chain of responsibilities”

International intermodal CTUs are usually closed and sealed when transported to destination. Thus, although accidents during CTU transport may be caused by improper packing and securing of cargo within the CTU, or lack of information to the driver and carrier about the cargo within the CTU, the responsibilities of the stakeholders in the supply chain are not always clear.

All parties involved in CTU transport should take necessary measures for ensuring safe intermodal CTUs transport in order to implement comprehensive policies for safe transport.

For these reason, this chapter should set out provisions on the roles and responsibilities of all stakeholders in the supply chain.

2.2 Contents of “7.0 Chain of responsibilities”

In general, the forms of contracts for international carriage vary widely. However, the subsections, definition of stakeholders, and their responsibilities in chapter 7, should be worked out to ensure that information is appropriately circulated from the originator to those who should have received the information at the very minimum,

Although further discussion is needed, the following example is proposed for the modification of the subsections included in this chapter:

- 7.1 Consignor / Packer
- 7.2 Consolidator / Packer
- 7.3 Freight Agent
- 7.4 Multimodal Transport Operator
- 7.5 Road Carrier
- 7.6 Rail Carrier
- 7.7 Terminal and stevedore
- 7.8 Maritime Carrier
- 7.9 Consignee

2.3 Point to be included in “7.0 Chain of responsibilities”

The point below should be included as responsibilities of stakeholders.

- .1 Packer responsible for packing cargoes into CTUs must stow the cargo at proper position and secure the cargo appropriately in CTUs in accordance with COP. Additionally packer should issue the information of the CTUs to a person who has made the packing contract.
- .2 All stakeholders in the supply chain shall make considerations to ensure that CTU information is circulated to the driver and carrier, and circulate the information appropriately according to the form of the carriage contract.
- .3 Driver and carrier shall make effective use of CTU information to safely transport the CTU.

3.1 Basic Concept for “8.0 Chain of information”

This chapter should set out provisions on the information necessary for safe transport, information flow paths, CTU information circulation method, and timing to circulate CTU information in order to circulate information sufficiently about the cargo within the CTU to the carrier, so as to ensure safe intermodal CTU transport.

3.2 Point to be included in “8.0 Chain of information”

8.1 Information necessary for safe transport

It is pointed out that accidents with international intermodal CTU transport occur because the driver and carrier are unaware of the CTU information, and therefore, cannot transport the CTU appropriately. For example, causative factors associated with trailer rollover accidents include total weight (weight-over), inappropriate cargo stow in

the CTU (off-center load), driving speed (speed-over) and so on. Of these factors, total weight and off-center load may be estimated from CTU information, such as the description of cargo, cargo weight, and packing condition. For these reasons, CTU information on the cargo description, weight, and packing condition must be circulated.

8.2 Information flow paths

It is necessary to circulate CTU information up to carrier, driver and CTU handling worker through appropriate information flow path to ensure safety during intermodal CTU transport. The information flow path must include at least:

- .1 Information flow path from packer up to consignor and consignee and/or between consignor and consignee who can be the starting point of information path to the driver and/or carrier of both in loading place and unloading place and:
- .2 Information flow path from a person who can be the starting point of information path such as consignor, consignee and consolidator down to driver and/or carrier

In order to accomplish this, it is essential that the packer circulates CTU information to the consignor.

8.3 CTU information circulation method

CTU information should be circulated to stakeholders through available information flows in current trading practice, without creating excess burden.

8.4 Timing to circulate CTU information

CTU information is circulated for the purpose of ensuring safe transport. CTU information must therefore be circulated to the appropriate persons before the CTU is transported, including to the driver and/or carrier.