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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 (ICHCA International) 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 ICHCA International reproduced below, and decide as appropriate.

Preliminary comments on the 1st draft of the Code of Practice for

Packing of Cargo Transport Units (CTUs)

General

A considerable amount of effort and research has gone into the draft thus far and the Consultant should be congratulated. This is a quantum leap from the old document and will truly move us towards the “comprehensive bible “on packing CTU’s we spoke of at the first meeting.

There is some concern over the sheer amount of text, especially in view of comments re non-English speaking recipients. It might be possible to insert more photographs and drawings in certain sections to amplify the text and ICHCA, through its membership, could help to source some of these if requested.

Some paragraphs refer to many different aspects and might need to be broken down.

Some paragraphs are written in the negative when a positive may have more effect.

The complexity and technical detail in this document is aimed at managerial level. Presumably we will be considering extracts for operators at various levels.

The document as presented seems to be a mixture of “advice”, “background information” and “technical information” in a mixture of impersonal and imperative styles.

There is much useful information in the first six sections and the Main section should then go on to give practical guidance but still contains definitions and other like material. Perhaps the two should be clearly delineated which would then lend itself to easier modular dissemination to different operational levels.

There is reference to GP Containers and in other places DC containers, this should be consistent for one term with cross referencing in the definitions section as appropriate. (GP is more US speak)

In places the text is very abrupt, it may be that words have been missed in the draft. We will emphasise exactly where after more careful reading

There is no reference to “training” in the early sections.

Specific Sections

2.1.6. The drawings are not clear; are they meant to be representative or specific.

Saying “Do not pack heavy loads with small footprint” is ok but we should expand the explanation on how to do this.

2.2.1/2 Should mention container with current CSC plate

2.2.12. Not clear what the drawing is showing

2.2.4.3. Should also mention wearing of eye protection

2.3.1 Yes, for example ILO Convention 27 (1929) marking of weights on packages.

3.1.6. We can supply more example photographs

4.6.1 Not only longitudinal forces are relevant . Vehicles overturn on roundabouts and roads with adverse camber. Hanging loads (which we haven't found reference to yet by the way) all cause vertical forces.

4.8.3 Drawings need enlarging, we can supply if reqd

5.1.5.3 Should this mention electrical plug-ins and SSR's (Self-sustained reefers) with diesel units?

7.1.1 Line 3 suggest "some detailed sketches", should we show an example?

Should mention "training" again here and cross refer to appropriate section(s)

Section 10 (or possibly 2 or both) should mention watching out for CTUs with limited racking or stacking capability (ie non ISO)

10.4.1 Should we mention the significance of the CSC plate and what to do if it is not current?

10.4.2.8 reference to "20 foot container have 4 and 40 foot 8 " should be 5 and 10,

10.4.3 ACEPs are mentioned but not PESs

10.4.4.2 The information is not in the CSC but in the "Harmonizes Interpretation" There should be clearer reference to this. Is this not though background info that should be at the beginning and not in the working part of the document?

11.2.4 to 11.2.6 better quality diagrams required

11.2.6.12 This does not reflect modern heavy duty containers with gross weight of 32.4 tonnes and payload of 28 tonnes. We have access to a "rule of thumb" guide for footprint that could be used for operators. Do the formulas need changing?

11.8.1 Dunnage section should mention the hazards of the dunnage itself, ie treatments, infestation and some countries require certification or even prohibit use of.

Mention of dunnage bags (later) should be moved here

11.8.1.3. Should mention what actually causes "sweat"

11.8.1.3 and 4, Should mention dessicants or drying agents

11.8.5 It should be mentioned that steel banding is not allowed for rail transport

There should be guidelines for risk of accidents in the event of breakage

Mention of MSL is missing

11.8.5.3 Should be an “edge protector” used in the drawing

11.8.6.2 It is not allowed to use any lashing materials without the accompanying certificate clearly showing the SWL and breaking load.

11.8.7.1 The mentioned “kit” is not common globally.

11.8.7.2 this is not the current situation, the use of such materials is now great and not dependent on shipping line for returning.

11.8.7.3 Would change “prefabricated belts will always be supplied.. “ to “should always be supplied with “

11.8.7.4 generally accepted term is “one way lashing” and “extreme” strength should not be used. Perhaps suggest as alternative “light but strong, like polyester belting” Polyester is definitely the most common material in use. Kevlar is rare and far too expensive for one way lashings.

11.8.7.5 “high values of tension” this is too wide ranging a statement which does not take into account the wide range of tensioners available from low, through medium to high tension and the advice that responsible suppliers give is that the tooling and the tension should match the application and the tension applied should not overload the lashing rings. Also in many applications it is essential that maximum tension is applied without overloading the lashing rings to prevent movement either by downward force (eg top-over lashing) and friction or by removing a great part of the elongation of the strap (eg direct lashing). Sufficient tension is essential in all lashing applications and should not therefore be generalised so we would suggest.. “ Care should be taken not to overload the lashing rings by applying excessive tension”

This also applies to pre-fabricated belts with longer armed ratchets and all other lashing materials.

Photos are of old equipment and we can supply more modern ones.

11.8.7.6 “loosen with vibration” needs a photo really as otherwise users will not know what this means. We recommend a photo of the system to make it clear, ie dynablock buckles which are designed not to loosen even with vibration.

11.9.1.2 This is really “cargo care” and should we not show the whole range of packing markings, many in use commonly are not in the ISO standard for example.

11.9.1.10 to .15 We have other colour drawings/photos available if required

11.9.4.1-2 Not a good diagram and there is insufficient blocking against longitudinal acceleration shown.

11.9.13.1 “tensioned lightly” the point here again is that sufficiently high tension is essential in preventing cargo movement, It is necessary to take as much elongation out of the lashing but leave sufficient to cater for (a) circumference reduction of the cargo during transport due to timber and dunnage shrinkage etc and (b) shocks and jolts. We would therefore recommend “ tensioned sufficiently”

11.9.13.3. We would argue that “ Lashing has an increasing role to play”, one member who is a supplier alone supplied sufficient CTU lashing material for 1.5 million CTU's and that was just one supplier!

12.0 DG's, I know we have said that we would cross-refer to IMDG code and other relevant legislation but should we not reproduce the Placards and DG signs here?

12.2.11 to add? DC/Flexitank mode is not allowed for IMO classified liquids.

14.2.6.2. This should include need for hooks to face outwards the 30 degree angle is only referred to in ISO 3874 for bottom lifts?

14.2.6.3 Implies that any container can be lifted by slings at 30 degrees. The table in ISO 3874 says otherwise

Annex 1; PES should be included

Annex 2: Can not some of the definitions in the main text be lifted and placed in here?

Annex 3.

3.1.1.3 there is more up to date data available

3.1.1.5.2 Should mention 9ft 6” do exist

3.1.1.6.3. Fitted with what?

3.1.2 also known as a GP or DV/DC

Note page 86 says “ not intended for the carriage of....solids in bulk”, whilst page 87 states “the GP container is also becoming a major transporter of bulk powders “ which is of course a solid bulk cargo?

Final sentence on page 87 should say “granules within dry liners” and liquids in flexitanks”

3.1.7.3 Careful with “interconnectors” as not all are approved and ILO still says flatrack bundles should be strapped.

3.1.7.6 should increase gross to 50,000 kg and payload to 45,000 kilos or 45 metric tonnes

3.1.8.1 Doesn't mention SSR's (Self-sustained reefers) These are ISO sized reefers with built in diesel unit and MDO tank. Sometimes electrical dual operation as well. (handy for rail)

Annex 4 No mention again of use of dessicants and that sometimes it is poor information from shipper to line/operator that results in poor stowage or handling

Additional

Use of straps to help prevent injury when opening doors should be included

There are a number of interesting tables giving information on the number and percentage of containers of certain types. It would be useful to add one relating to the different types in the world fleet.

Off-shore containers are not mentioned, and the different marking of date of last inspection required

No reference to "one door off" containers

Can there be mention of the pros and cons of "shrink wrap" over "stretch wrap" when preparing unitised loads on pallets,

Similarly column stows re interlock stows of cartons etc (interlocking reduces a carton's top to bottom compression strength by up to 50%)