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

Third session

Geneva, 15–17 October 2012

Item 3 of the provisional agenda

Updates on the second draft of the Code of Practice for Packing of Cargo Transport Units

Comments on the second draft of the CTU Code

Transmitted by the expert of the USA

1. The comments on the second draft of the CTU Code from the expert of the United States of America are presented below for consideration by the Group of Experts.

I. CTU Code (Informal document EG GPC No. 15 (2012))

2. In Chapter 3, we would lean more towards "Requirements" vs. "Key Requirements".
3. In Section 3.4, there was a question of if there should be a reference to IMDG. Should the Group of Experts decide to add the reference, we would suggest making sure to use the new 7.3 in the 36-12 Amendment, since it is different from the 35-10 amendment.
4. In Sections 10.2.1.6 and 10.2.3.9, we would take out the last sentence with the website. If you must include something, stick with IMO recognized references.
5. At DSC 17, the USA and ICHCA submitted a paper on counterfeit refrigerants. The DSC agreed that the incident should be brought to the attention of the Group of Experts for the revision of the IMO/ILO/UNECE Guidelines for Packing of CTUs. We would suggest putting this information in one of two places:
 - Option 1) Section 7.1.4.6, in which it talks about the cooling that takes place with liquefied gases, or
 - Option 2) Chapter 11, in which it would be considered as "Additional advice".
6. Option 1) Section 7.1.4.6 is our preferred location for the mention on counterfeit refrigerants, since that is where the liquefied gases are mentioned first. Recommended text would be:

7.1.4.6.X "Refrigerant gas shall only be replaced in accordance with the manufacturer's operating instruction for the refrigeration system. Prior to filing replacement refrigerant gas, a certificate of analysis from the supplier shall be obtained and checked to confirm that the gas meets refrigeration system specifications. In addition, the replacement refrigerant gas

shall be checked for possible contamination prior to use. If the refrigerant gas is found to be contaminated it shall not be used, the cylinder shall be plainly marked "CONTAMINATED", the cylinder shall be sealed and sent for recycling or disposal and notification shall be given to the refrigerant gas supplier and authorized distributor and competent authority(ies) of the countries to which the supplier and distributor reside, as appropriate. The date of last refrigerant replacement shall be included in the maintenance record of the refrigeration system."

This suggested text can be used in either option 1) or 2).

7. Of the two Chapter 14 options, we tend to like option 2 more.

II. Annexes to the CTU Code (Informal document EG GPC No. 15 (2012) – Add.1)

8. In Section II.4.7, the same website that is referenced in the main text of the CTU Code, is done so as well here. Our opinion is the same as in para. 4 above.

9. Section XV.1.8 talks about thermal containers. This might be a good place to mention the counterfeit refrigerants. See para. 6 above for possible text to be added.
