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

Third session

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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 (Chapter 5)

Transmitted by the expert of Japan

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

A. Comments on Chapter 5

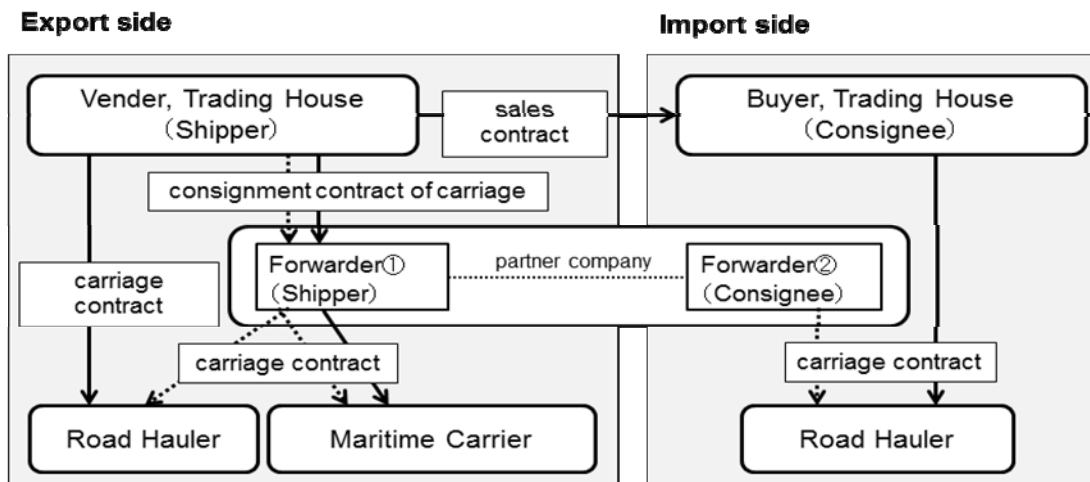
1. Information flow path

1.1 Problems of information flow path

The information flow path described in the 2nd draft doesn't assume that the party other than the shipper arranges road transport. As the result, carriers who execute the road transport in the import side may not acquire the necessary information. Therefore, in case a consignee makes the road transport contract, the rule that the consignee shall transmit the information to the road hauler should be clarified.

1.2 Necessary amendment

Thinking of above problems, the consignee should be added to the party responsible to transmit information because the consignee may make the road transport contract with the carrier. And, the information flow path from the shipper to the consignee should be added for transmitting the necessary information to the consignee. Moreover, the freight forwarder should be added to the party responsible to transmit information as well as the shipper and the consignee, in order to keep the information path to the carrier uninterrupted.



2. Information necessary for safe transport

2.1 Following information necessary for safe transport should be clarified in the paragraph “5.2 Information”.

2.1.1 Gross mass of the CTU

As described in the paragraph 5.1.10.3 of the 2nd draft, gross mass of each CTU should be transmitted as information of weight.

2.1.2 Item's name in the CTU

The paragraph 5.1.10.3 of the 2nd draft says “the cargo inside the CTU is fully and accurately described”. Mass of each items of goods prescribed in the paragraph 5.1.10.1 of the 2nd draft should be included in this information.

2.1.3 Packing condition in the CTU

According to the paragraph 5.1.10.3 of the 2nd draft, only extraordinary properties are required to be transmitted. However, at least the information on packing condition such as type of packages (i.e. carton, drum, can, bale, bundle, in bulk) should be always transmitted to the carrier, with a consideration for ensuring safe transport of all CTUs. Moreover, transmitting pictures and sketches to show stowage conditions is better.

2.2 Necessary amendment

Add a new paragraph “5.2.2. Information necessary for safe transport”.

B. Proposal of amendments to the 2nd draft

“Chapter 5. Chains of Responsibilities and information

5.1 Chain of responsibility

5.1.10 Between the different parties involved in an intermodal transport chain, the tasks are assigned as follows:

5.1.10.1 The consignor is “responsible” that

- Information necessary for safe transport described in 5.2.2 needs to be transmitted to the carrier in making the transport contract with him;
- the goods are correctly described including the mass of each item of goods as well as the total payload;
- ~~unusual transport parameters such as extraordinary cargo properties, the offset of the centre of gravity or transport temperatures which should not be exceeded or undereut, are properly communicated to the shipper or carrier;~~
- packages and unit loads are suitable to withstand the stresses which are to be expected under normal transport conditions;
- dangerous goods are correctly classified, packed and labelled;
- the dangerous goods transport document is completed and signed and transmitted to the packer, forwarder and carrier as applicable.

5.1.10.2 The packer is “responsible” that

- Information necessary for safe transport described in 5.2.2 needs to be transmitted to the party who makes the packing request to the packer;
- a suitable cargo transport unit (CTU) is used, according to the properties of the cargo;
- the CTU is checked with respect to serious deficiencies;
- the floor of the CTU is not overstressed during packing operations;
- the cargo is correctly distributed in the CTU and properly supported where necessary;
- the CTU is not overloaded;
- the cargo is sufficiently secured in the CTU;

- the CTU is properly closed and sealed if so required by the applicable mode of transport;
- any marks and placards required by Dangerous Goods Regulations are affixed to the CTU;
- the gross mass of the CTU is properly determined;
- in case of container CTU with a reduced stacking capacity (less than 192,000 kg marked on the CSC Safety Approval Plate)¹, this fact is communicated to the forwarder/carrier;
- ~~all information on the contents of the CTU, the verified gross mass², the seal number (where applicable) and any extraordinary properties of the cargo are transmitted to the shipper/carrier;~~
- a CTU packing certificate, when required, is completed and signed and transmitted to the shipper.

5.1.10.3 The shipper is “responsible” that

- Information necessary for safe transport described in 5.2.2 needs to be transmitted to the carrier in making the transport contract with him, and to the consignee and the freight forwarder who makes the transport contract with the carrier.
- the work distribution concerning packing and securing is clearly agreed and communicated to the consignor and carrier/carriers
- a suitable CTU is used for the intended cargo for the intended transport
- the CTU used for the intended transport is in good condition, checked for serious deficiencies and cleaned before supplied to the consignor or packer
- suitable modes of transport are selected to minimize the risk of accidents and damages for the actual cargo
- all required documents are received from the consignor and from the packer;
- the cargo inside the CTU is fully and accurately described, based upon the documents received;
- the gross mass of the CTU is accurately declared, based upon the documents received;
- the description of the cargo and the gross mass, based on the payload and the tare weight of the CTU, is communicated to the carrier before the transport operation commences;
- in case of sea transport, the description of the cargo and the gross mass is communicated to the carrier as early as required by the carrier;

¹ As of January 1st 2012, all ISO containers with reduced stacking or racking strength are required by the International Convention for Safe Containers (CSC) to be marked in accordance with the latest version of ISO 6346: Freight containers – Coding, identification and marking.

² The gross mass can be verified by exact calculation or by weighing. The gross mass needs to be verified before any transport operation commences. Incorrect gross masses are a hazard for any mode of transport. Therefore, the mass verification must be carried out before the unit leaves the premises of the packer. If a certain transport mode deems it necessary that a re-verification has to take place when the CTU is transferred from one mode to another, this is beyond the scope of this Code of Practice and should be regulated in the regulations of that mode.

- in case of dangerous goods, the transport document and (for sea transport) the packing certificate is transmitted to the carrier before the transport commences respectively as early as required by the carrier;
- ~~the seal number (when applicable) is communicated to the carrier;~~
- ~~any extraordinary properties such as reduced stacking capacity or out of gauge are communicated to the carrier.~~
- the shipper's declaration is accurate (see Annex V.1.2.1).
- shipping instructions are despatched to the carrier on time and that the CTU meets the outbound delivery window (see Annex V.1.3.1.1.).
- the CTU arrives at the terminal before the stated cargo cut off time.

5.1.10.4 The freight forwarder is “responsible” that

Information necessary for safe transport described in 5.2.2 provided by the consigner / consignee needs to be transmitted to the carrier in making the transport contract with him.

5.1.10.5 The road haulier is responsible for:

5.1.10.6 The rail haulier is responsible for:

5.1.10.7 The port facility is responsible for:

5.1.10.8 The carrier is “responsible” that

5.1.10.9 The consignee is “responsible” that

Information necessary for safe transport described in 5.2.2 needs to be transmitted to the carrier in making the transport contract with him.

5.1.10.10 The receiver of a CTU ~~/consignee~~ is “responsible” that

- the floor the CTU is not overstressed during unpacking operations;
- the CTU is sufficiently ventilated before entering;
- no hazardous atmosphere is present when entering;
- any detected damage to the CTU is notified to the carrier;
- the CTU is returned to the carrier completely empty and clean, unless otherwise agreed;
- irrelevant marks or placards for dangerous goods are removed.

5.2 Information

5.2.1 General

5.2.2 Information necessary for safe transport

- **Seal number of the CTU**
- **Total mass of CTU**
- **General shipping item's name (the goods are correctly described including the mass of each item of goods as well as the total payload)**
- **Packing condition (general description of type of packing (i.e. carton, drum, can, bale, bundle, in bulk etc.)**

- In case of extraordinary cargo properties, unusual transport parameters such as the offset of the centre of gravity, upper and lower limited temperatures in transit, reduced stacking capacity or out of gauge, bulk liquids carried in flexitanks, hanging cargo. It is preferable to be transmitted attaching photographs or sketches, if necessary.
- In case of dangerous goods, the transport document and (for sea transport) the packing certificate

5.2.3 Shipper

5.2.3.1 In most transport contracts the principle contacts are between the shipper and the carrier, others parties such as the terminal or haulier, though actively involved are responsible either of these parties. Therefore it is important to understand the relationship

5.2.3.2 **Figure 5-1** shows the scope of the shipper. A shipper may act as the processor of information receiving information about the cargo and the packing details from the consignor and packer / consolidator respectively and transmitting it to the parties involved in the transport of the CTU.

5.2.3.3 The shipper may also be the packer / consolidator receiving goods from the consignor and packing them into the CTU before despatching it to the carrier.

5.2.3.4 Finally the shipper may be the consignor, producing the goods, packing it into the CTU and then contracting the carrier to move the CTU to its destination.

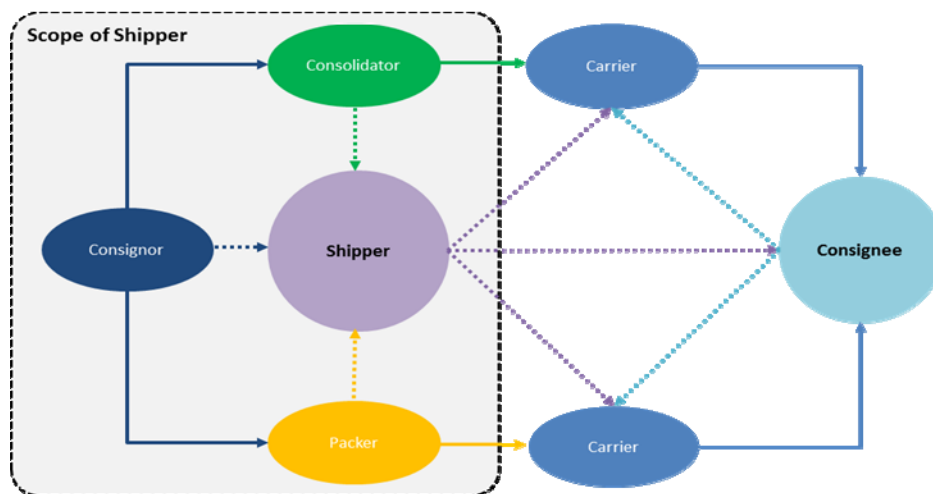


Figure 5-1 : Scope of shipper

5.2.4 Consignee and Freight Forwarder

5.2.4.1 Consignee

In order to transmit CTU's information to the carrier who executes the transport in the import side, the shipper needs to transmit CTU information to the consignee so that the consignee can transmit the CTU's information to the carrier.

5.2.4.2 Freight forwarder

The freight forwarder needs to transmit CTU information provided by the consignor / consignee to the carrier, if the transport contract with the carrier is made through the freight forwarder.