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

**Fourth session**

Geneva, 4 – 6 November 2013

Item 6 (b) of the provisional agenda

**Proposals for amendments to the final draft of the CTU Code:**

**General comments and proposals for a revised structure**

## **Comments on and proposals to the draft CTU Code**

**Transmitted by ICHCA International**

### **Introduction**

1. ICHCA International would like to congratulate the Group of Experts, its Chairman, the secretariats involved and the work of the Consultant in producing the comprehensive document we have before us as contained in IMO Paper DSC 18-8.

2. After extensive consultation of our own it is clear that all of the information currently contained in the draft Code is of relevance to support the work of those who have to pack and secure cargo inside CTUs. However the structure of the Code itself requires significant modification so that it can be presented to the industry in a practical format.

3. Therefore we fully support the recommendation in paragraph 18 of the report of the DSC 18 working group on the Revision of the Guidelines for Packing Cargo Transport Units in that the CTU Code should be user-friendly and divided into three parts:

1. Main body
2. Annexes, which are referenced in the main body, and
3. Appendices, containing informative material

The main body itself could be further sub-divided i.e. Chapters 1 to 4 in an appropriately titled Part One and chapters 5 to 13 in part 2 but we would prefer to wait to see what structure is proposed by other delegations and have no wish to confuse the situation.

4. In conversation with other delegations to the IMO DSC Working Group there were also suggestions that Chapter 3 which contains the “dos and don’ts” of CTU packing was not necessary. We feel that this is an integral part of the Code, goes to the heart of what we are trying to say and should be preserved. We also support other delegations views that this part of the Code should be enhanced so that all of the bullet points (where appropriate) should cross refer the reader to the relevant sections of the Code, Annexes or Appendices that expand on the information in the specific bulletpoint. Unfortunately due to time

constraints before the submission date we have not had time to develop a proposal for this but we are aware that other delegations have done so.

5. We are also aware from previous meetings of the Group of Experts, that some delegations expressed concern that by removing important text or whole chapters from the body of the Code and putting them into Annexes or Appendices somehow gave the impression that these sections were of less importance.

6. To remedy this we would propose a new paragraph be inserted into the pre-amble, at the appropriate place with wording such as:

“For ease of use this Code of Practice has been divided into three parts, namely;

Main Body of the Code

Annexes which are referenced in the main body

Appendices containing informative and supplementary information

Users of the Code should note that the Main Body and the Annexes that support it are integral parts of the Code and should be regarded as such”.

7. We would also support the development and implementation of a web based version with hyperlinks and a user guide, this guide could steer those with different responsibilities throughout the logistics chain to the relevant parts of the Code.

8. If there is only to be a printed version, it is essential that this is free to the user or its promulgation will be seriously limited. It would probably also benefit from an index.

9. We also have some editorial and other changes to the text (*Note by the secretariat: these proposals are reflected in the consolidated lists - Informal document EG GPC No. 6 (2013) and No. 7 (2013)*).

## **Proposed changes to the structure of the annexes**

10. Annexes to be ordered logically. We also view annexes 1,2,4,5,7,8,9,11,14 and 20 as essential information to be cross referenced from Chapter 3 as appropriate.

11. Annexes 3,6,12,13,15,16,17,18,19 and 21 could become appendices, with 6, 10, 17 and 21 having the least significance.

12. Annex 3, if retained, could be reduced in size and limited to the salient points for terminal operations.

13. Annex 13 could be an appendix to Annex 12.

14. Annexes 18 and 19 should be referenced in Annex 12

15. Annexes will need to have their own page numbers inserted as navigation is currently difficult.