The voice of global cargo handling

PREMIUM MEMBERS:

Captain Richard W A Brough O.B.E., B.A. Head of ICHCA International
WHY IS THE CTU CODE SO IMPORTANT?
Train de-railments
Vehicle Roll-overs
A frequent occurrence!
Vessel Capsizings and lost containers
Ship fires on the increase....... Every 30 days
A major vessel fire every 30 days
And what causes these??
Dangerous Goods either not declared or misdeclared
Non-dangerous goods can become dangerous!
Shippers often misdeclare goods
Or use inadequate CTUs!
..and take no account of packing and securing requirements

And take extraordinary risks!
But clearly a problem here!
CARGO INTEGRITY
And this is definitely bad practice – but all too common unfortunately
Lack of cleanliness

Industry and govt response to poor selection, packing and securing often leading to serious cargo damage and even loss of life
Dangerous Goods
DG Compliance
And do not pick the right kind of container
So we have to protect people....
No ! we need prodding……?

IMO
INTERNATIONAL MARITIME ORGANIZATION

4 ALBERT EMBANKMENT
LONDON SE1 7SR
Telephone: +44 (0)20 7735 7611    Fax: +44 (0)20 7587 3210

MSC.1/Circ.1442
1 June 2012

INSPECTION PROGRAMMES FOR CARGO TRANSPORT UNITS
CARRYING DANGEROUS GOODS

1. The Maritime Safety Committee, at its ninetieth session (16 to 25 May 2012), noted that Member Government reports, submitted in accordance with the format set out in annex 2 to this circular, on inspections of cargo transport units (CTUs), as they are defined in chapter 1.2 of the IMDG Code, carrying dangerous goods for international transport by sea, could benefit by having guidance on how to conduct the inspections being reported. Inspection procedures and protocols may vary, depending on the specific type of CTU, on how it is presented for inspection (e.g. whether mounted on chassis or grounded), and on the need for additional precautions dependent upon the specific nature of the dangerous goods (e.g. radioactive, explosive, inhalation hazard).
Empirical Evidence is hard to obtain but just looking at stowage and securing of cargo in freight containers.

How many possible movements per annum with DGs?

5,400,000

So how many is that with a serious deficiency based on IMO stats?

1,160,000

If we extrapolate that to all cargoes the figure could be as high as?

21,600,000
The challenge is huge……?

**ANNEX**

**Container Inspection Safety Initiative**

<table>
<thead>
<tr>
<th>Load Port Region</th>
<th>Number of units inspected</th>
<th>Units with deficiencies</th>
<th>Type of deficiencies (number of units)</th>
<th>Total of deficiencies</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Number</td>
<td>Percentage</td>
<td>Securing</td>
</tr>
<tr>
<td>North America</td>
<td>166</td>
<td>78</td>
<td>47%</td>
<td>63</td>
</tr>
<tr>
<td>South America</td>
<td>60</td>
<td>34</td>
<td>57%</td>
<td>33</td>
</tr>
<tr>
<td>Europe</td>
<td>104</td>
<td>65</td>
<td>63%</td>
<td>57</td>
</tr>
<tr>
<td>Asia</td>
<td>291</td>
<td>192</td>
<td>66%</td>
<td>128</td>
</tr>
<tr>
<td>Oceania</td>
<td>2</td>
<td>1</td>
<td>50%</td>
<td>1</td>
</tr>
<tr>
<td>Africa</td>
<td>2</td>
<td>2</td>
<td>6%</td>
<td>1</td>
</tr>
<tr>
<td>Total</td>
<td>825</td>
<td>372</td>
<td>6%</td>
<td>283</td>
</tr>
</tbody>
</table>

**Share of Deficiencies**

- Securing %
- Placarding/Marking
- Mis-Declared %
- Other %

- **59.5%!**
And next……?

- Review of IMDG Special Provisions (trigger was Charcoal)
- Review of IMO Recommendations on Handling /Storage DGs
- MSC Circ 1442 revision is underway to include ALL cargo and CTU Types and reporting from NGOs
- Review /Update of the IMO/ILO/UNECE CTU Code and annexes
- Possible “APP” to be developed
11 Important industry outcomes; many in conjunction with International Regulatory Bodies
Cargo Integrity Group

- Develop messages and content for info documents to raise awareness
- Investigate if existing “terms of carriage” can be amended to adhere to CTU
- Support the revision cycle from the industry
- Support IMO/ILO/UNECE specifically in their endeavours
- Develop submission to revise handling and storage of DG’s (Marine SPs)
- Mapping between UN DG Nos and HS Codes to remove confusion
- Contribute to WCO SAFE programme
- Consolidate guidance for CTU bookings screening
- Support work at IMO’s CCC on CTU Inspections
- Support guidance on prevention of pest contamination
# Container Packing Checklist

A Checklist for the Safe Packing and of Sea Containers and Avoidance of Pest Contamination

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<table>
<thead>
<tr>
<th>The packing area</th>
<th>YES</th>
<th>NO</th>
<th>N/A</th>
<th>CTU Code Guidance*</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Is smoking, eating and drinking banned during packing, securing and unpacking operations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Is the type of container appropriate for the cargo to be carried?</td>
<td></td>
<td></td>
<td></td>
<td>Ch 8.3</td>
</tr>
<tr>
<td>3. Is the Container positioned so that it can be accessed safely?</td>
<td></td>
<td></td>
<td></td>
<td>Ch 8.3 Annex 5, S2</td>
</tr>
<tr>
<td>4. Have steps been taken to avoid contamination by pests?</td>
<td></td>
<td></td>
<td></td>
<td>Ch 8.2.4 Annex 6</td>
</tr>
<tr>
<td>5. Has a packing plan been prepared showing the arrangements of goods in the Container?</td>
<td></td>
<td></td>
<td></td>
<td>Annex 7 S1</td>
</tr>
<tr>
<td>6. Are the maximum permitted payload limits of the Container sufficient for the intended load?</td>
<td></td>
<td></td>
<td></td>
<td>Annex 4 S2</td>
</tr>
<tr>
<td>7. Do all timber pallets, dunnage or other wooden packing material meet ISPM-15 standards and show the required markings?</td>
<td></td>
<td></td>
<td></td>
<td>Annex 7 S2</td>
</tr>
<tr>
<td>8. Have staff assigned to pack the container been trained to understand the practices of safe loading and avoidance of pest contamination</td>
<td></td>
<td></td>
<td></td>
<td>Ch 13 Annex 10</td>
</tr>
</tbody>
</table>

## Container condition

<table>
<thead>
<tr>
<th>Container condition</th>
<th>YES</th>
<th>NO</th>
<th>N/A</th>
<th>CTU Code Guidance*</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Does the container interior show signs of damage, infestation by pests or previous cargo residues, such as water ingress, rust, residues, stains or debris?</td>
<td></td>
<td></td>
<td></td>
<td>Annex 6</td>
</tr>
<tr>
<td>10. Is the container exterior free of soil, or other visible infestation by pests?</td>
<td></td>
<td></td>
<td></td>
<td>Annex 6</td>
</tr>
</tbody>
</table>

## Packing the container

<table>
<thead>
<tr>
<th>Packing the container</th>
<th>YES</th>
<th>NO</th>
<th>N/A</th>
<th>CTU Code Guidance*</th>
</tr>
</thead>
<tbody>
<tr>
<td>11. Has the heaviest cargo been packed at the bottom of the container with any lighter weight cargo on top?</td>
<td></td>
<td></td>
<td></td>
<td>Annex 7 S4</td>
</tr>
</tbody>
</table>
6. **CTU condition checks**

1.4 In addition, the general public may be at risk from a poorly packed CTU resulting in a road accident or train derailment. Just how important it is to ensure cargo is from consignor to consignee.

These include:

- **CTU Operator**
- **Inspectors / Surveyors**
- **Insurers**
- **Customs**
Thank you

rwab@broughmarine.co.uk