

## IUMI comments to Informal Working Group on the revision of the CTU Code

### Compelling need

If changes are to be considered in the CTU Code, there is a need to demonstrate the necessity for such amendments. It should be demonstrated that cargo has been stowed and secured in accordance with the CTU Code and yet incidents have occurred that cannot be attributed to inappropriate handling of the CTU.

### Clarification on the general intent of the proposals of the Russian Federation

It is important that any changes to the CTU Code relating to long haul rail transports do not result in conflicting demands with other established international or regional rules and standards for the different modes of transport. It is thus requested that it is clarified if the proposed changes are intended to apply generally for all transports or only to rail transports in certain areas.

### Clarification on specific items in the proposals of the Russian Federation

A few of the proposals in the document submitted by the Russian Federation are given in general terms. Further explanations on their background or a specified alternative text would be beneficial. In the following some questions and clarifications are listed in response to some of the proposals outlined in the document by the Russian Federation:

#### *Item 5:*

*In calculations for securing cargo in wagons and containers to be transported by rail in the Russian Federation, specific longitudinal inertial forces (a value similar to the product of the acceleration coefficient and gravitational acceleration ( $a = g = 9.81 \text{ m/s}^2$ )) of 1.0 – 1.19 tf/t in the longitudinal direction and of 0.33 – 0.5 tf/t in the transverse direction are used.*

**IUMI question:** Which of the suggested accelerations that are presented are proposed to be used and can be demonstrated that these may occur with a significant duration?

*Item 6:*

*As there are three additional categories for marine transport, depending on the vessel's responsivity determined by the significant wave height of specific sea areas, it would be useful to introduce several categories for rail transport as well, according to the conditions of transportation (type of rolling stock, speed, shunting technology, etc.). The choice of acceleration coefficient used in the calculation will depend not only on the mode of transport, but also on the route.*

**IUMI question:** In which way should the proposed different categories for rail transport be presented so that it is clear to the packer which level of cargo securing is required for the intended transport?

*Item 8:*

*In accordance with the requirements of ISO 1496-1, paragraph 6.6.2, when testing a solid end wall and an end wall with a door opening, the container shall be subjected to an internal load of 0.4 R and each of the side walls to an internal load of 0.6 R. The internal load must be evenly distributed over the wall to be tested. These permissible values are correct only when the entire loading volume of the container is used and cannot be applied when securing heavy individual cargo units. Permissible values should be specified for wall loading in case of the placement of the load on part of the wall area (up to a certain height), as well as concentrated loads.*

**IUMI question:** By which principle should the allowed blocking capacity of the walls be calculated for different contact geometry between the cargo and the wall?

*Item 11:*

*The sum of void spaces between the goods (150 mm) given in 2.3.6 should be revised.*

**IUMI question/comment:** What figure instead of 150 mm is proposed to be used for the sum of void spaces? If this item relates to cargo damages rather than safety aspects, it is perhaps better to keep this practical advice for most palletized cargoes, as the text is intended today, and to insert a note that sensitive cargoes may require a tighter stow, similar to the note on impacts with very short durations during rail transports in section 5.3.

*Items 12-13:*

*12. The definition in 2.3.8. of the blocking capacity of dunnage bags for the securing of goods in containers should be revised.*

*13. The formula given in appendix 4, paragraph 4.3, for calculating permissible load on dunnage bags is not relevant, as manufacturers do not indicate the bursting pressure of the dunnage bags in marking. The proposed methodology should be changed.*

**IUMI question:** What measure of the capacity of dunnage bags in relation to the cargo weight they may secure is proposed to be used instead of bursting pressure?

*Item 15:*

*In 2.4.4, the pre-tension given for lashings (braces and ropes) of 50% of the working load (lashing capacity) does not correspond to the pre-tension for web lashings. For example, the pre-tension for web lashings with a maximum securing load of 2,000 kgf is 500 kgf (according to EN12195-2). In 4.1.4, permissible values should be specified in respect of the recommendations concerning the loads on the container body components given in 3.1.1 to 3.1.3.*

**IUMI question/comment:** According to paragraph EN 12195-2 the pre-tension in a web lashing shall be between 10% and 50% of the Lashing Capacity (LC). The statement in item 15 seems to contradict this and it needs to be clarified why the limiting STF of a lashing with MSL (LC) 2000 kgf (daN) is interpreted as 500 kgf (daN).

*Item 18:*

*In the first bullet point of 4.1.3, it should be added that forces should not be transferred to the container doors.*

**IUMI comment:** The statement in item 18 contradicts what is already concluded in item 7 and Annex 7 paragraph 4.2.5 of the CTU Code. The need for the requested additional text must thus be clarified.

*Item 20:*

*In 4.3.1, it would be useful to introduce a tipping resistance safety margin of 10–20% in the tipping calculation formula.*

**IUMI comment:** It should be clarified why there is a need for an extra safety margin when determining the risk of tipping and how the result of using this should be used when designing cargo securing arrangements.

*Item 21:*

*In accordance with the recommendations set forth in 4.4.3 and the proposals in 4.4.4 and 4.4.5, specific requirements should be formulated for the securing of goods in containers during transportation by rail, and methods should be specified for evaluating the suitability and application of the securing arrangement.*

**IUMI comment:** It should be clarified which specific requirements would apply to rail transportation.



*Item 22:*

*Additional requirements should be included in 4.4.6 and an appropriate method for evaluating the suitability of the cargo securing arrangement should be added in appendix 5.*

It should be clarified what testing methods are proposed to be inserted and if they are proposed to replace the current testing method for cargoes in CTUs that are to be transported by rail.

## About IUMI

The International Union of Marine Insurance e.V. (IUMI) is a non-profit association established for the purpose of protecting, safeguarding and advancing insurers' interests in marine and all types of transport insurance. It also provides an essential forum to discuss and exchange ideas, information and statistics of common interest for marine underwriters and in exchange with other marine professionals.

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