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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

Structure of the CTU Code and annexes

Transmitted by International Group of P&I Associations

1. International Group of P&I Associations thinks that the structure of the CTU Code should be the following:

Code – enforceable

Annex – supports code

Appendix – information

Current - Proposed - Proposed title

Chapter 1 – Chapter 1 - Introduction

Chapter 2 – Chapter 2 - Definitions

Chapter 3 – Chapter 3 - Key requirements

Chapter 4 – Chapter 4 - Chain of responsibility

Chapter 5 – Annex 1 – General Transport Conditions

Chapter 6 – appendix 1 – CTU types and properties

Chapter 7 – appendix 2 - Suitability

Chapter 8 – Annex 2 – Arrival checking and positioning of CTU

Chapter 9 – Annex 3 – Packing cargo into CTU

Chapter 10 – Annex 4 – Dangerous cargo legislation

Chapter 11 – Annex 5 – On completing of packing

Chapter 12 – Annex 6 – Unpacking of CTU

Chapter 13 – Annex 7 – Training requirements for cargo packing and unpacking a CTU

Annex 1 - appendix 3 – Consequences

Annex 2 - appendix 4 – Information and document flow

Annex 3 - appendix 5 – safe transport of containers at sea

Annex 4 - appendix 6 – Quick lashing guide

Annex 5 - appendix 7 – Avoiding Condensation Damage
Annex 6 - removed – with CTU properties
Annex 7 - appendix 8 – Intermodal road/rail/sea load distributions
Annex 8 - appendix 9 – Container approval plates
Annex 9 - appendix 10 – Transport of perishable cargo
Annex 12 - appendix 11 – Receiving CTUs
Annex 11 - appendix 12 – CTU condition checks
Annex 13 - appendix 13 – Minimising risk of recontamination
Annex 14- appendix 14 – Packing and securing cargo into a CTU
Annex 15 - appendix 15 – Manual handling
Annex 16 - appendix 16 – Access to tank and bulk container tops. Working at height,
Annex 17 - appendix 17 – CTU seals
Annex 18 - appendix 18 – Fumigation
Annex 19 - appendix 19 – Testing CTU for hazardous gases
Annex 20 – removed - In Annex 7 Training requirements
Annex 21 - appendix 20 – Acronyms

2. As much of the data is out of date or very soon dates unless there is a methodology in place to keep the appendices up to date we would recommend deleting Annex 6, 7, 9 and 17.
3. Sections of IMDG Code should not be repeated. Simply referenced only.
4. Once structure is resolved then document will need complete re-referencing.
5. Current annex 20 should be included in new annex 13. Therefore only one annex on training and subjects to be included.
