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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

Proposal on the contents and structure of annexes

Transmitted by World Shipping Council and International Chamber of Shipping

- Annex 1. Consequences of improper packing procedures
- Annex 2. Information and documentation flow
- Annex 3. Safe transport of containers at sea
- Annex 4. Quick lashing guides
- Annex 5. Condensation damage
- Annex 6. CTU types We recommend this be moved to Appendices
- Annex 7. Intermodal road / rail / sea load distribution Should be deleted
- Annex 8. Approval plates
- Annex 9. Transport of perishable cargo We recommend this either be moved to Appendices or deleted
- Annex 10. (Left void)
- Annex 11. CTU condition checks We do not agree with inclusion of Part 5
- Annex 12. Receiving CTUs
- Annex 13. Minimising the risk of recontamination
- Annex 14. Packing and securing cargo into CTUs
- Annex 15. Manual handling
- Annex 16. Access to tank and bulk tops, working at height
- Annex 17. CTU seals We recommend this be moved to Appendices

Annex 18. Fumigation We recommend this be moved to Appendices to facilitate changes in accordance with future revisions of the IMDG Code

[As discussed at DSC 18, Annex 18 would need to be changed every time the underlying regulations change. This may be entirely impractical considering the modi operandi of the three UN organizations sponsoring the Code. We propose for consideration that Annex 18 be made an Appendix that – supposedly – can be amended whenever the regulations are.]

Annex 19. Testing CTUs for hazardous gases We recommend this be moved to Appendices as an “Example only”

[As this Annex relies solely on one example of a national program, we do not believe that it should be maintained as an Annex. We could, however, agree to move it to the Appendices as long as it be made clear – not just in a footnote – that it is an example only]

Annex 20. Topics to be included in a training programme

Annex 21. Acronyms We note that the current Annex 21 needs careful review to ensure that acronyms used do not have different meanings. For example, currently OBL is defined as Original Bill of Lading; however, the same acronym is also used as Ocean Bill of Lading