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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 (a) of the provisional agenda

Proposals for amendments to the final draft of the CTU Code

**Consolidated list of proposed amendments to the draft CTU
Code (main part)**

The secretariat reproduces below a list of proposals for amendments to the main part of the draft CTU Code, based on comments received by the deadline of 8 October 2013.

The list includes proposals by the IMO Working Group on Container Safety¹, United Kingdom of Great Britain and Northern Ireland, United States of America, International Cargo Handling and Coordination Organization (ICHCA), International Chamber of Shipping (ICS), International Group of P & I Associations (P&I Clubs), International Transport Workers Federation (ITF) and World Shipping Council (WSC).

¹ See also Informal document EG GPC No. 4 (2013) on the outcome of the eighteenth session of IMO Sub-Committee on Dangerous Goods, Solid Cargoes and Containers.



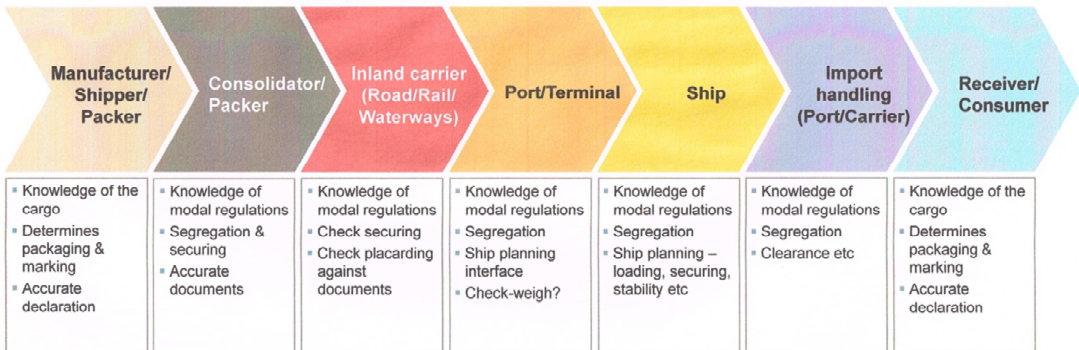
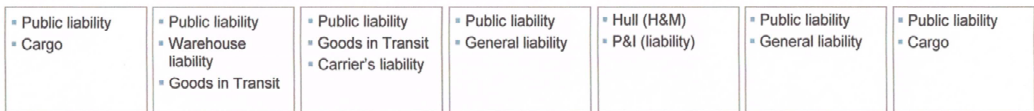
Proposed amendments to the draft CTU Code (main part)

Chapter	Section	Submitter(s)	Comment	Proposed text
Table of contents		IMO	The table of contents should also contain the annexes.	
All		IMO	Throughout the text abbreviations are used. Abbreviations can only be used after they are explained. This is not always the case (e.g. table of contents CTU, 1.3.6 CTU, 2.5.2 OOG). Perhaps annex 21 should come first.	
All		WSC /ICS	Acronyms : We recommend that the first time a term is used in the main text it be written out with abbreviation indicated in parenthesis.	
Preamble		UK	Amend first paragraph as follows:	<p>The use of freight containers, swap bodies, vehicles or other cargo transport units substantially reduces the physical hazards to which cargoes are exposed. However, improper or careless packing <u>or loading</u> of cargoes into/onto such units, or lack of proper blocking, bracing and lashing, may be the cause of personnel injury when they are handled or transported. In addition, serious and costly damage may occur to the cargo or to the equipment.</p> <p><u>The types of cargoes carried in freight container has expanded over many years and innovations such use of flexitanks and developments allowing heavy, bulky items which were traditionally loaded directly into the ships hold e.g stone, steel, wastes and project cargoes, to be carried in CTUs.</u></p>
Preamble		UK	Add a new bullet at the end:	<ul style="list-style-type: none"> • (...) • crew members of a seagoing ship during the transport operation; • <u>those who have a statutory duty to inspect cargoes;</u> and • those who unpack the unit.
1	1.1.1	IMO	Amend the beginning as follows: In the rest of the text, replace "this Code of Practice" by "this code"	The aim of <u>Code of Practice for Packing of Cargo Transport units (CTU Code)</u> this Code of Practice (CTU Code) is to give advice (...)
1	1.3.1	IMO	All annexes should be referred to in the text.	
1	1.3.4	WSC /ICS	Ament two last sentences as follows:	The Chapter also reflects the principle that although the packer's responsibility is to ensure that the cargo is properly packed and secured in the CTU, everyone in the supply chain has a responsibility to the care of the cargo and this is demonstrated in Chapter 4 Chains of responsibility and information which identifies the chains of responsibility and communication for the principle <u>functionaries-parties</u> in the supply chain. Failure to pack CTUs correctly <u>or declare their weights</u> can be seen in Annex 1 Consequences of improper packing procedures.

Chapter	Section	Submitter(s)	Comment	Proposed text
2	Definitions	ICHCA	There is duplication between this set of definitions and those of “key players” in 4.1.5	
2	Definitions	UK	Add a new definition for “closed cargo transport unit” as follows:	<u>is a cargo transport unit which totally encloses the contents by permanent structures with complete and rigid surfaces. Cargo transport units with fabric sides or tops are not considered as closed cargo transport units.</u>
2	Definitions	UK	Add a new definition for “freight container” as follows: It is believed when the term “container” is used, where appropriate, it should be replaced with the term “freight container” to avoid misunderstanding.	<u>is an article of transport equipment that is of a permanent character and accordingly strong enough to be suitable for repeated use; specially designed to facilitate the transport of goods, by one or other modes of transport, without intermediate reloading; designed to be secured and/or readily handled, having fittings for these purposes, and approved in accordance with the International Convention for Safe Containers (CSC), 1972, as amended. The term “freight container” includes neither vehicle nor packaging. However a freight container that is carried on a chassis is included.</u>
2	Definition for Packer	WSC / ICS	Amend definition as follows (as the CTU Code also covers e.g. tank CTUs, the actionable verb(-s) needs to be expanded):	The party that <u>loads, places or fills</u> the goods within the CTU.
2	Definition for Reinforced vehicle body	USA	Amend definition as follows (other regional standards may apply outside Europe. Reference to regional standards should not be made unless the specific region of application is explicitly stated):	Vehicle body, having a reinforced structure <u>(in Europe, complies with European Standard EN 12642, paragraph 5.3), and complying with the minimum requirements of paragraph 5.3 of EN 12642[†] (performance code XL according to Table 1).</u>
2	Definition for Reinforced vehicle body	USA	Delete footnote 1 (this gives undue weight to a regional standard. If it is intended that this apply to all, then relevant sections should be agreed, extracted and inserted directly into the Code):	[†]-EN 12642:2006 Securing of cargo on road vehicles — Body structure of commercial vehicles — Minimum requirements
2	Definition for Standard vehicle body	USA	Amend definition as follows (other regional standards may apply outside Europe. Reference to regional standards should not be made unless the specific region of application is explicitly stated):	Vehicle body, <u>without reinforced structure (in Europe, complies with European Standard EN 12642, paragraph 5.2) complying with the minimum requirements of paragraph 5.2 of EN 12642 (performance code L according to Table 1) which, depending on cargo weight and friction, requires additional securing of cargo using lashing equipment.</u>
3	3.2	IMO	Amend third bullet as follows:	<ul style="list-style-type: none"> • Do select the securing methods best adapted to the characteristics of the cargo, <u>the mode of transport</u> and the properties of the CTU.
3	3.5	IMO	Amend seventh bullet as follows:	<ul style="list-style-type: none"> • Do not secure the cargo with devices overstressing the structure of the CTU <u>or the cargo.</u>

Chapter	Section	Submitter(s)	Comment	Proposed text
3	3.6	WSC / ICS	Amend second bullet as follows:	<ul style="list-style-type: none"> Do affix a seal <u>on CTUs used for international transport, and on other CTUs</u> when required.
3	3.7	IMO	Add a warning that the atmosphere within the CTU can be dangerous. This can be done by adding a new fourth bullet with the following text:	<ul style="list-style-type: none"> <u>Do pay attention that the atmosphere in the CTU may be dangerous – ventilate before entering.</u>
3	3.7	USA	Amend sixth bullet as follows:	<ul style="list-style-type: none"> Do remove all securing and protection material for reuse, recycling or disposal.
3	3.7	WSC / ICS	Amend as follows (the removal requirement does not only pertain to marks for dangerous goods):	<p>Unpacking</p> <ul style="list-style-type: none"> Do check that the identification number on the CTU and, when the CTU <u>is should be</u> sealed, the seal serial number, are as shown on the transport documentation. Do check the exterior of the CTU for signs of leakage or infestation. <u>Do</u> use proper equipment to cut the seal if <u>existingaffixed</u>. <u>Do ensure that the CTU is free from fumigants or other noxious substances.</u> Do open the CTU with caution as cargo might fall out. Do record every package as it is removed noting any markings and damages. Do remove all securing and protection material for reuse, recycle or dispose. Do clean the interior of the CTU to remove all traces of <u>fumigants and</u> the cargo, especially loose powders, grains and noxious materials, unless otherwise agreed <u>with the CTU operator</u>. Do remove all <u>dangerous goods</u> marks, <u>placards and signs regarding the previous consignment</u> from the exterior of the CTU once it has been cleaned.
4		P&I Clubs	There should be some emphasis that it is the responsibility for consignor, shipper, packer, consignee and carrier that staff handling or involved with booking dangerous cargo should be trained commensurate for the task assigned as per chapter 1.3 of the IMDG Code.	
4	4.1.1	IMO	Amend last sentence as follows:	Notwithstanding any national legislation or contracts between the involved parties the chain of responsibility discussed below identifies the functional responsibilities of the parties involved.

Chapter	Section	Submitter(s)	Comment	Proposed text
4	4.1.2	IMO	Delete the first sentence as this statement is not correct. The carrier is responsible for theft, damages due to improper handling, drop of a CTU etc.	During transport, the carrier is not responsible for the cargo in a CTU.
4	4.1.2	WSC / ICS	Delete first sentence.	During transport, the carrier is not responsible for the cargo in a CTU.
4	4.1.2	P&I Clubs	Cannot agree with first sentence. Carrier cannot be responsible for the packing and securing within the container and subsequent losses ensuing from this, however is responsible to the safe handling of the container and any losses arising from this. Should the cargo leak/sift from the container the carrier is obligated to investigate and make safe and invoice the shipper for any cost arising.	
4	4.1.2	ICHCA	Amend first and second sentences as follows:	During transport, the carrier is not responsible for the cargo in a CTU. <u>although the carrier generally, in a "contract of carriage" is responsible under that contract to deliver the cargo in the same condition as received, it is</u> the shipper <u>who</u> should deliver a cargo which is safe and suitable for transport.
4	4.1.2	WSC / ICS	Amend fourth sentence as follows:	However, when the shipper is neither the packer nor the consignor, the packer or <u>and</u> the consignor should fulfil their obligation to the shipper ensuring that the CTU is safe for transport.
4	4.1.4	WSC / ICS	Amend as follows:	All persons involved in the movement of CTUs also have a duty to ensure, <u>in accordance with their roles and responsibility in the supply chain,</u> that the CTU is not infested with <u>plants,</u> insects or other animals, or that the CTU is not carrying illegal goods or immigrants, contraband or undeclared or misdeclared cargoes in accordance with their responsibility in the supply chain.
4	4.1.5, freight forwarder	WSC / ICS	Amend the definition of freight forwarder as follows (the agent may contract with a freight forwarder that issues its own B/Ls (also known as NVOCC), and who in turn contracts with an ocean carrier (VOCC)):	the party who organizes shipments for individuals or other companies and may also act as a carrier. When the freight forwarder is not active as a carrier, it acts only as an agent, in other words as a third-party (non-asset-based) logistics provider who dispatches shipments via <u>asset-based</u> carriers and that books or otherwise arranges space for these shipments.
4	4.1.5, packer	WSC / ICS	Amend the definition of packer as follows:	the party that <u>loads,</u> places <u>or fills</u> the goods within the CTU; the packer may be contracted either by the consignor, by the shipper, <u>by the freight forwarder</u> or by the carrier; if the consignor or the shipper packs a CTU within his own premises, the consignor or the shipper is also the packer.

Chapter	Section	Submitter(s)	Comment	Proposed text
4	4.1.5, shipper	WSC / ICS	Amend the definition of shipper as follows:	the party named on the bill of lading or waybill as shipper and/or who <u>concludes a contract of carriage</u> (or in whose name or on whose behalf) a contract of carriage has been concluded) with a carrier. Also known as the sender.
4	4.1.5, shipper	ICHCA	There is a definition for “shipper” in the table. We suggest using broader term “consignor” throughout the document.	
4	4.1.5	ICHCA	We could show the “players” pictorially. Thereafter definitions and responsibilities could be placed together in the text. If this is not possible then “hyperlinks” could be used, especially in the website version. An example of what we mean is as follows:	<p style="text-align: right;">Verification of Container Weights ICHCA International Ltd </p> <p style="text-align: center;">TT CLUB  Overview of the Supply Chain</p>  <p style="text-align: center;">Typical range of relevant insurances</p>  <p style="text-align: center;">established expertise</p>
4	4.1.5	UK	Add a new definition for “ Inspectors/surveyors ” as follows:	<u>Regulator employed inspectors/surveyors.</u> <u>Inspectors/surveyors employed by commercial elements of the supply chain.</u>

Chapter	Section	Submitter(s)	Comment	Proposed text
4	4.2.1 CTU operator	P&I Clubs	First bullet: "fit for purpose". Not sure a CTU can do this. Shipper maybe proposing to load a cargo which is unsuitable for the container and has made the wrong choice. The container should be suitable plated (CSC as necessary).	
4	4.2.1 CTU operator	WSC / ICS	Amend fifth bullet as follows:	<ul style="list-style-type: none"> are free from <u>plants and visible</u> pests
4	4.2.1 CTU operator	P&I Clubs	Amend fifth bullet as follows (how can CTU operator ensure it is free from pests? What about during delivery at consignee's yard? Underside of container?):	<ul style="list-style-type: none"> are free from <u>obvious</u> pests
4	4.2.1 CTU operator	WSC / ICS	Delete last bullet (the CTU operator does not fumigate CTUs -- the shipper does or has arranged that it be done. Further, it is the responsibility of the consignee to ensure that the CTU is free from fumigants or other noxious substances and is cleaned upon de-vanning).	<ul style="list-style-type: none"> are free from fumigants or other noxious substances.
4	4.2.2 Consignor	WSC / ICS	Amend last bullet as follows:	<ul style="list-style-type: none"> ensuring the dangerous goods transport document is completed, signed and transmitted to the packer, forwarder, <u>shipper</u> and carrier as applicable.
4	4.2.3 Packer	WSC / ICS	Amend sixth bullet as follows:	<ul style="list-style-type: none"> ensuring that measures are put in place to prevent the movement of <u>plants and</u> pests, such as closing doors and tarpaulins once packing has started but not taking place and lights that minimise the attraction of insects;
4	4.2.3 Packer	WSC / ICS	Amend seventh bullet as follows:	<ul style="list-style-type: none"> properly closing the CTU and sealing it, if and when <u>-applicablerequired</u>, and reporting seal details to the shipper. CTUs used for international transport should be sealed;
4	4.2.3 Packer	WSC / ICS	In the tenth bullet, replace "properly" be with "accurately" in order to be consistent with the attendant responsibility of the shipper.	<ul style="list-style-type: none"> <u>properly-accurately</u> determining the gross mass³ of the CTU and transmitting it to the shipper;

Chapter	Section	Submitter(s)	Comment	Proposed text
4	4.2.3 Packer	WSC / ICS	In the tenth bullet, amend footnote 3 as follows:	³ The gross mass <u>of the CTU</u> needs to be verified before any transport operation commences. Incorrect gross masses are a hazard for any mode of transport. Therefore, the <u>gross</u> mass verification should be carried out before the unit leaves the premises of the packer. If a certain transport mode deems it necessary that a reverification has to take place when the CTU is transferred from one mode to another, this is beyond the scope of this Code of Practice and may be regulated in the regulations of that mode. Where a cargo is to be transported by road or rail only, the packer need only provide the <u>net-mass of the cargo and any packing and securing material</u> to the carrier when the tare of the transport vehicle is not known.
4	4.2.3 Packer	IMO	Sums up the items for which the packer of the CTU is responsible. The packer is also responsible for the segregation requirements of dangerous goods and that no incompatible dangerous goods are loaded. This item is not in the list. As it is an important issue for safe sea transport of dangerous goods, a new bullet point, at least before the last one, should be added which could read as follows:	<ul style="list-style-type: none"> <u>ensuring that no incompatible dangerous goods are loaded. Account should be taken of all dangerous goods legislations during the complete transport chain.</u>
4	4.2.3 Packer	IMO	Amend last bullet as follows (the container/vehicle packing certificate is asked for. This can be done by the completion of the statement in the Dangerous goods documentation or by a separate document):	<ul style="list-style-type: none"> <u>providing the container/vehicle packing certificate (new document or signed statement in the dangerous goods transport documentation as appropriate) and forwarding any documentation to the shipper</u>completing the container/vehicle packing certificate section of the dangerous goods transport documentation as appropriate and forwarding any documentation to the shipper.
4	4.2.3 Packer	WSC / ICS	Last paragraph: while not disagreeing with the inclusion of this, we note that – as also pointed out in the 2nd bullet under shipper – the shipper is responsible that a suitable CTU is used, and therefore should already be aware of any reduced stacking capacity. Would it therefore be more appropriate to specify this under the 2nd bullet point of 4.2.4 (shipper) ?	

Chapter	Section	Submitter(s)	Comment	Proposed text
4	4.2.3 Packer	P&I Clubs	Containers with reduced stacking capability are invariably shipper owned. If carrier operated they should be aware of the stacking capability of their own container fleet. Thus it is beholden on the container operator to not the packer to notify the carrier of any stacking capacity of less than 192,000kgs.	
4	4.2.4 Shipper	P&I Clubs	Amend first bullet as follows:	<ul style="list-style-type: none"> • <u>for packing and securing the container which may be delegated or contracted out to the packer the work distribution concerning packing and securing is clearly agreed and communicated to the consignor and carrier/carriers.</u>
4	4.2.4 Shipper	P&I Clubs	Third bullet: This function would normally be carried out by the party contracted to pack the container.	
4	4.2.4 Shipper	WSC / ICS	Amend third bullet as follows:	<ul style="list-style-type: none"> • the CTU used for the intended transport is <u>safe for transport in good condition, checked for serious deficiencies and is cleaned and free from plants and visible pests</u> before supplied to the consignor or packer;
4	4.2.4, footnote 5	USA	In the eighth bullet, amend footnote 5 as follows (better descriptor):	⁵ A description of the cargo should include a description of the goods and the packaging, for example wine in a flexitank, hard frozen hanging beef sides or <u>the number and type of packages-a number of packages.</u>
4	4.2.4, footnote 5	WSC / ICS	In the eighth bullet, amend footnote 5 as follows:	⁵ A description of the cargo should include a description of the goods and the packaging, for example wine in a flexitank, hard frozen hanging beef sides or a number of packages. <u>However, national and/or regional regulations may impose additional requirements for the scope and level of detail of cargo descriptions, including usage of codes.</u>
4	4.2.4 Shipper	WSC / ICS	Amend ninth bullet as follows:	<ul style="list-style-type: none"> • in case of sea transport, the <u>accurate</u> description of the cargo and the verified gross mass is communicated to the carrier as early as required by the carrier;
4	4.2.4 Shipper	WSC / ICS	Insert a new twelfth bullet as follows:	<ul style="list-style-type: none"> • <u>ensuring that a seal, where required is affixed immediately upon completion of the packing of the CTU. CTUs used for international transport should be sealed;</u>
4	4.2.4 Shipper	WSC / ICS	Amend existing twelfth bullet as follows:	<ul style="list-style-type: none"> • the seal number (<u>if and when applicable where required</u>) is communicated to the carrier;
4	4.2.4 Shipper	IMO	Amend last bullet as follows:	<ul style="list-style-type: none"> • the information concerning the consignment, <u>and</u> description of packages <u>and, in the case of containers, the verified gross mass</u> is transmitted to the consignee.

Chapter	Section	Submitter(s)	Comment	Proposed text
4	4.2.5 Road haulier	P&I Clubs	First bullet: road haulier can only confirm that the gross mass declared is within national road/ highway legislation. He cannot confirm unless placed on weight bridge. Even with new SOLAS arrangement movement to scaling facility will move on declared gross mass.	
4	4.2.5 Road haulier	WSC / ICS	Insert a new third bullet as follows:	<ul style="list-style-type: none"> • <u>except when the CTU is a trailer, securing the CTU properly on the trailer or chassis;</u>
4	4.2.5 Road haulier	P&I Clubs	Additional point: haulier must deal with any sifting/ leakage of cargo from CTU and make safe. This may include calling on other agencies emergency services.	
4	4.2.6 Rail haulier	WSC / ICS	Amend second bullet as follows:	<ul style="list-style-type: none"> • <u>except when the CTU is a rail wagon,</u> securing the CTU properly on the rail wagon;
4	4.2.7 Intermodal operator	WSC / ICS	Amend first bullet as follows ("Pest prevention methods" are, of course, aimed at ensuring "that pests are not inadvertently transported on CTUs". Furthermore, appropriate pest prevention methods may, depending on the location of the intermodal operator and the applicable trade flows, include other measures than removal of muds or soils):	<ul style="list-style-type: none"> • ensuring that <u>appropriate</u> pest prevention methods are in place and that pests are not inadvertently transported on CTUs which may include removal of muds and soils from the CTU.;
4	4.2.7 Intermodal operator	WSC / ICS ITF	Insert a new second bullet as follows:	<ul style="list-style-type: none"> • <u>ensuring CTUs declared empty are as such.</u>
4	4.2.7 Intermodal operator	P&I Clubs	Additional point: rail operator must deal with any sifting/ leakage of cargo from CTU and make safe. This may include calling on other agencies emergency services.	
4	4.2.8 Carrier	P&I Clubs	Additional point: carrier must deal with any sifting/ leakage of cargo from CTU and make safe. This may include calling on other agencies emergency services.	

Chapter	Section	Submitter(s)	Comment	Proposed text
4	4.2.9 consignee / receiver	WSC / ICS	Amend fifth bullet (de-vanned CTUs may not be returned to the CTU operator but may instead be moved directly to a new consignor/packer/shipper (so-called “street turns”)):	<ul style="list-style-type: none"> • returning the CTU to the carrier completely empty and clean <u>the CTU, and ensure that it is free from fumigation, other noxious substances, and plants and pests,</u> unless otherwise agreed;
4	4.2.9 consignee / receiver	WSC / ICS	Amend last bullet as follows (the removal requirement does not only pertain to marks for dangerous goods):	<ul style="list-style-type: none"> • removing all irrelevant marks, or placards <u>or signs for dangerous goods regarding the previous consignments.</u>
4	4.2.10	WSC / ICS	Amend as follows:	<p>4.2.10 All functions <u>and parties</u> identified within section 4.2 should minimise the risk of recontamination of CTUs when <u>in their custody at their facility.</u> <u>This may include the following:</u></p> <ul style="list-style-type: none"> • <u>implementation of appropriate pest management programs; that include lighting, netting, fencing, trapping and sanitation should be used to exclude pests</u> • <u>remove removal of any plants or visible pests or contaminant taking into account the roles and responsibilities of each party within the supply chain and, further, the impossibility of inspecting the interior of closed and sealed CTUs for recontamination, that has been introduced while on site at terminal facility</u> <p>For more information see Annex 13.</p>
4	4.2.11	P&I Clubs	Additional point: If container opened for any reason (customs, leaking etc) new seal number must be communicated to consignor, consignee/notify party and revised documentation may have to be reissued	

Chapter	Section	Submitter(s)	Comment	Proposed text														
4	4.2.11	WSC / ICS	Amend as follows:	<p>4.2.11 All functions <u>and parties</u> should ensure that the flow of information is transmitted to parties identified in the transport contract along the supply chain. The information should include:</p> <ul style="list-style-type: none"> the identification, <u>in accordance with a risk assessment</u>, of <u>risks to the integrity of the CTU any hazard</u> that may be present for all or some part of the journey CTU identification seal number (if and when where applicable) verified gross mass of the CTU accurate description of the cargo carried in the CTU the correct description of dangerous goods correct and appropriate transport documentation (see Annex 2 Part 2) any information required for safety, security, <u>phytosanitary, veterinary, -and/-or</u> custom's <u>or other regulatory</u> purposes. 														
5	5.3	ICHCA	This is too detailed in the body of the Code and should be in the appropriate annex.															
5	5.3, table for "Sea transport"	USA	In the last row, amend transverse acceleration coefficient (C_y) as follows: (in many cases on a container vessel when containers are stowed on deck at the top of the stack, a coefficient of 0.8 is not sufficient. A coefficient of 0.9 will not always be sufficient but would suffice in the vast majority of cases. A coefficient of 1.0 would only be insufficient in rare cases).	<table border="1"> <thead> <tr> <th colspan="2"></th> <th>Longitudinally (c_x)</th> <th>Transversely (c_y)</th> <th>Minimum vertically down (c_z)</th> </tr> </thead> <tbody> <tr> <td rowspan="2">C</td> <td>$H_s > 12$ m</td> <td>Longitudinal direction</td> <td>0.4</td> <td>-</td> </tr> <tr> <td></td> <td>Transverse direction</td> <td>-</td> <td>0.8<u>[0.9]</u> <u>[1.0]</u></td> </tr> </tbody> </table>			Longitudinally (c_x)	Transversely (c_y)	Minimum vertically down (c_z)	C	$H_s > 12$ m	Longitudinal direction	0.4	-		Transverse direction	-	0.8 <u>[0.9]</u> <u>[1.0]</u>
		Longitudinally (c_x)	Transversely (c_y)	Minimum vertically down (c_z)														
C	$H_s > 12$ m	Longitudinal direction	0.4	-														
		Transverse direction	-	0.8 <u>[0.9]</u> <u>[1.0]</u>														
5	5.3	IMO	Amend the footnote in the acceleration table for combined rail transport as follows:	The values in brackets apply to shock loads with short impacts of 150 milliseconds or shorter, and only -need <u>not to</u> be used for static design of cargo securing arrangements.														
5	5.4	IMO	Amend second sentence as follows: NOTE: The term "locking" should be defined in the Definitions section.	Therefore, whenever the cargo cannot be secured by <u>[locking in or]</u> blocking, lashing is always -required <u>to prevent the cargo from being significantly displaced</u> .														

Chapter	Section	Submitter(s)	Comment	Proposed text
5	5.4	ICHCA	This is not always possible, so is the statement correct?	
5	5.5	ICHCA	Once again this is information best placed in an informative appendix.	
6		ICHCA	It would be preferable to make the introduction to types more succinct with details in the Annex. A result of this would be that each type of CTU would have one brief paragraph covering (a) key characteristics of the unit and (b) material restrictions in relation to cargo types and (c) modes in which it can be used.	
6	6.1.1	WSC / ICS	Amend as follows (we recommend that Annex 6 in accordance with the DSC 18 discussions be moved to the Appendices with informative material):	6.1.1 When planning a consignment for transport the shipper should ensure that the “best possible” CTU <u>best suited</u> for the cargo and the probable route is selected. If the shipper is uncertain <u>about which CTU to select</u> , further information can be <u>found in Annex 6 or obtained</u> by contacting the CTU operator.
6	6.1.2	WSC / ICS	Amend first sentence as follows (packers cannot reasonably be expected or assumed to review each type of CTU and make a selection accordingly. Such selection is the task and responsibility of the shipper):	Packers should acquaint themselves with the <u>characteristics of the CTU provided benefits and deficiencies of each type of CTU</u> with particular reference to:
6	6.1.2	WSC / ICS	Fifth bullet: what does this mean? If this refers to the possibility of sealing of the CTU, then this should be clarified. Otherwise, we recommend that this bullet point be deleted.	<ul style="list-style-type: none"> • <u>[security]</u>
6	6.2.1	IMO	[The definition of a container as in the UN Model Regulations on the Transport of Dangerous Goods is preferred. It reads as follows:]	<u>[A container means an article of transport equipment that is of a permanent character and accordingly strong enough to be suitable for repeated use; specially designed to facilitate the transport of goods, by one or other modes of transport, without intermediate reloading; designed to be secured and/or readily handled, having fittings for these purposes, and approved in accordance with the International Convention for Safe Containers (CSC), 1972, as amended. The term "container" includes neither vehicle nor packaging. However a container that is carried on a chassis is included]</u> A container is a transport containment of permanent character with a structural strength designed to withstand repeated use. It is designed to facilitate the carriage of goods through one or more modes of transport without intermediate reloading and fitted with standardised corner fittings permitting easy handling, stacking and securing in the modes of transport; sea, road and rail.]

Chapter	Section	Submitter(s)	Comment	Proposed text
6	6.2.1	WSC / ICS	Insert a last paragraph as follows:	The below discussion of container characteristics and types is not exhaustive as new container types are regularly introduced to meet evolving market demands.
6	6.2.2	WSC / ICS	Delete last sentence.	The details of such containers are shown in Annex 6 part 1.
6	6.2.3	USA	Amend second sentence as follows (domestic requirements differ with local regulations):	The International Convention for Safe Containers requires each container <u>used in international transport</u> to carry a CSC safety approval plate, where the maximum permitted gross mass is specified (see Annex 8 part 3 and sub-section 8.2.1).
6	6.2.4	WSC / ICS	Amend as follows:	With the exception of platforms (a container deck without walls), packed containers are capable to be stacked. This feature is mainly used in land-based storage areas and on ships during a sea passage. The permissible stacking mass is displayed on the approval plate. The current ISO standard stacking mass is 213,360 kg while older containers have a stacking mass value of 192,000 kg. Containers with a stacking mass <u>equal or</u> above 192,000 kg may be transported without restriction. However, containers with a stacking mass value below 192,000 kg do also exist and require special attention when used for intermodal transport, in particular for the stowage in stacks on seagoing vessels (see sub-sections 7.3.1 and 8.2.1).
6	6.2.6	WSC / ICS	Amend second sentence as follows (the abbreviation "MSL" should only be used after the term has been written out):	When lashing rings are fitted, the anchor points at the bottom have a <u>maximum securing load (MSL)</u> of at least 10 kN in any direction.
6	6.2.6	WSC / ICS	We seek further clarification of this paragraph. Containers are built to the same standard which has 15 kN as the basic value.	
6	6.2.7	WSC / ICS	Amend as follows:	Container floors are built to withstand a maximum wheel pressure corresponding to an axle load of a fork lift truck of 7,260 kg or 3,630 kg per wheel⁶. Such axle loads are typical for FLT's with a lifting capacity of 3 tonnes. Containers Floors on containers covered by the CSC are only required to withstand an axle load of 5,460 kg or 2,730 kg per wheel⁷ although they may be built to withstand a greater axle load. The CTU operator can provide more precise information.
6	6.2.10	WSC / ICS	Amend last sentence as follows:	Open side containers are not covered by the ISO standards.
6	6.2.13	WSC / ICS	Amend first sentence as follows:	Thermal containers, <u>commonly referred to as reefer containers</u> , are designed for the transport of cargo under temperature control.
6	6.2.13	WSC / ICS	Amend last sentence as follows (reason: airbags between pallets can also be used for securing cargo):	When a cargo needs to be secured by lashings, specific fittings should <u>may</u> be affixed to the "T" section gratings, thus providing the required anchor points.

Chapter	Section	Submitter(s)	Comment	Proposed text
6	6.3 / 6.4	USA	Move section 6.3 (Swap bodies), along with subsections, behind section 6.4 (Regional and domestic containers) and renumber. A swap body would fall within the specifications of a "regional container".	6.46.3 Regional and domestic containers 6.4.16.3.1 Regional and domestic containers are (...) 6.4.26.3.2 (...) 6.36.4 Swap bodies 6.3.16.4.1 (...)
6	6.3.1	USA	Amend first sentence as follows (other regional standards may apply outside Europe. Reference to regional standards should not be made unless the specific region of application is explicitly stated):	A swap body is a typical European regional transport containment of a permanent character designed for road and rail transport <u>within Europe and complying with European Standards.</u>
6	6.3.10	WSC / ICS	Delete.	More information on swap bodies is provided in Annex 6 part 2.
6	6.4.1	USA	Amend second sentence as follows (domestic requirements differ with local regulations. In the U.S., a move from the mainland to Hawaii, for example, would be domestic and CSC requirements would not apply):	Regional and domestic containers are designed and manufactured to meet the needs of local transport operations. They may have the appearance of an ISO container, but unless fitted with <u>a valid CSC safety approval plates they should not be used in international transport</u> they may neither be carried in international road or rail transport nor by sea.
6	6.4.2	WSC / ICS	Delete.	More information is provided in Annex 6 part 3.
6	6.5.2	WSC / ICS	Amend as follows:	The packing of a roll trailer with cargo or cargo units must be planned and conducted under the conception that the cargo must be secured entirely by lashings. However, roll trailers are available equipped with standardised locking devices for the securing of ISO containers and swap bodies (Annex 6 part 4).
6	6.6.1	WSC / ICS	Amend as follows:	Road vehicles are available in a number of different formats and designs. More information on these various types is provided in Annex 6 part 5.
6	6.6.6, footnote 8	USA	Delete footnote 8 (this gives undue weight to a regional standard. If it is intended that this apply to all, then relevant sections should be agreed, extracted and inserted directly into the Code):	⁸ EN 12642:2006 Securing of cargo on road vehicles — Body structure of commercial vehicles — Minimum requirements.
6	6.6.7	USA	Amend first sentence as follows (other regional standards may apply outside Europe. Reference to regional standards should not be made unless the specific region of application is explicitly stated):	According to the In Europe, European standard EN 12642 <u>would apply. According to this,</u> there are two levels of requirements of vehicle sides and ends: Code L and Code XL.
6	6.7.1	WSC / ICS	Amend as follows:	In intermodal transport, railway wagons are used for two different purposes: First, they may be used as carrier unit to transport other CTUs such as containers, swap bodies or semi-trailers. Second, they may be used as a CTU themselves which is packed or loaded with cargo and run by rail or by sea on a railway ferry (see Annex 6 part 6).

Chapter	Section	Submitter(s)	Comment	Proposed text
7		ICHCA	We would suggest a review of the structure and intent of this section. It should cover (a) compliance of CTU with relevant regulations (e.g. CSC plating/IMDG etc.) and general structural deficiencies, including responsibilities of both supplier and packer to carry out checks, (b) choosing appropriate unit for nature of cargo with sub-paragraphs on sensitivities.	
7	7.1.2	WSC / ICS	Amend as follows:	Containers and swap bodies showing major <u>serious</u> defects in their structural components (e.g. top and bottom side rails, top and bottom end rails, door sills and header, floor cross members corner posts and corner fittings) may place persons into danger and are therefore not suitable for transport (see sub-section 8.2.2).
7	7.2.3	WSC / ICS	Amend last sentence as follows:	Therefore, specially designed containers with increased ventilation may be preferred for such sensitive cargo (see Annex 6 sub-section 1.2.3).
7	7.2.4	WSC / ICS	We recommend that Annex 9 in accordance with the DSC 18 discussions be moved to the Appendices with informative material	
7	7.2.5	ICHCA	Is this practical or realistic? This may present unwanted legal liability in its current form.	
7	7.3.4	WSC / ICS	Amend the heading and insert a new paragraph 7.3.4.1 as follows. Renumber subsequent paragraphs accordingly.	7.3.4 CTUs on Ferries <u>RO/RO ships</u> <u>7.3.4.1 Before dispatching a CTU for carriage on a RO/RO, the shipper needs to confirm with the CTU operator and/or the RO/RO ship operator whether specific requirements apply. Further, the shipper needs to ensure that the CTU to be used is fit for this kind of transportation.</u>
7	7.3.4	ICHCA	Is this actually required? The Code is aimed at cargo packers in the main and this relates to limitations for certain CTUs in certain trades. Is this not informative for an appendix?	
8	8.1.2	WSC / ICS	Amend first sentence as follows:	The CTU provider-operator will advise of the estimated time of arrival and departure. The type of CTU may influence these timings:


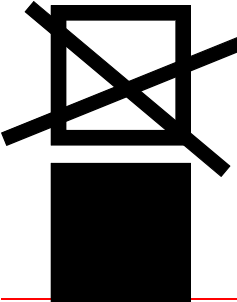
Chapter	Section	Submitter(s)	Comment	Proposed text
8	8.1.3 and 8.1.4	ICHCA	What is the relevance of 8.1.3 and 8.1.4? If they are to be retained there should be a sub-heading for 8.1.3 and these two paragraphs renumbered as 8.1.3.1 and 8.1.3.2.	8.1.3 [] 8.1.3.1 If the consignment requires more than one CTU then it is important to plan what packages go within each unit and how each CTU is managed: multiple units might be delivered all at once and the packer can manage positioning of each unit to suit the facility available. Another option is to deliver the units sequentially so that the container operator delivers an empty unit and picks up a fully packed one. 8.1.43.2 In both cases planning what packages go into each unit will be important. Demand at the destination may require particular packages to be packed in each CTU. However such demand can have an adverse effect on the load distribution, on possibility to secure the cargo properly, on the segregation of dangerous goods and also on volume utilisation. It is therefore important that a complete plan may be generated for all packages and CTUs prior to the start of packing the first CTU.
8	8.2.1.1	USA	Amend as follows (domestic requirements differ with local regulations. CSC and/or safety approval plate requirements may not be applicable):	Containers and, under certain conditions, also swap bodies and road trailers may be are required by applicable regulations to bear a safety approval plate. Details of the markings required on swap bodies and road trailers destined for transport by rail within the European railway network and data plates on containers transported <u>internationally</u> by sea and covered by the International Convention for Safe Containers (CSC) are shown in Annex 8.
8	8.2.1.2	WSC / ICS	After the bullets, insert a last paragraph as follows:	<u>If there is no CSC approval plate, the container should not be used in intermodal or international traffic.</u>
8	8.2.1.3.1 and 8.2.1.3.2	IMO	Figures 8.1 and 8.2: The figures should be made larger or replaced to make the information readable.	
8	8.2.1.3.2	ICHCA	Not relevant to the Code, information only.	
8	8.2.1.5	WSC / ICS	While we acknowledge that “door-off” containers loaded with perishable cargoes are relatively common, we recommend that references to “door-off”/“door open” not be included in the CTU Code or alternatively that this practice be discouraged. We believe that it is an inherently dangerous practice, which leaves the container prone to damage and poses unacceptable risks to personnel if door comes free. It should also be noted that many terminals refuse to lift “open door” containers.	
8	8.2.2	ICHCA	Would it be useful to include here who is responsible for these checks?	

Chapter	Section	Submitter(s)	Comment	Proposed text
8	8.2.2.1	WSC / ICS	Delete last sentence (we do not agree with the inclusion of Annex 11 part 5, which is taken from IMO's circular CSC/Circ. 138 regarding serious structural deficiencies. This circular is addressed to government inspectors. Packers are not government inspectors).	Acceptable limits of damages in the structural framework of a container are shown in Annex 11 part 5.
8	8.2.2.9	ICHCA	Amend first sentence as follows (the under structure may not be accessible):	When undertaking the exterior checks, the CTU under structure should be checked for any signs of recontamination particularly:
8	8.2.3.1	USA	Amend first sentence as follows:	Before entering a closed CTU, the doors should be opened for at least 10 minutes and at least ten minutes should be elapsed , to allow the internal atmosphere to regularise with the ambient.
8	8.2.3.1	WSC / ICS	Amend first sentence as follows (the time doors should stay open depends on the ambient atmosphere. The proposed amendment is in conformance with 12.1.5):	Before entering a closed CTU, the doors should be opened for a sufficient time before entering and at least ten minutes should be elapsed , to allow the internal atmosphere to regularise with the ambient.
8	8.2.3.1	ICHCA	Amend first sentence as follows:	Before entering a closed CTU, the doors should be opened and at least ten minutes should be elapsed elapse , to allow the internal atmosphere to regularise with the ambient.
8	8.2.3.3	ICHCA	Move this paragraph under 8.2.4 as follows:	8.2.3.38.2.4.x The CTU should not show liquids or persisting stains on flooring and side walls. There are a number of different materials and surface treatments used for flooring in CTUs. Sealed surfaces generally can be cleaned with absorbent materials. Where a stain can be transferred by wiping a gloved hand over it, the CTU should not be used and a replacement CTU should be requested.
8	8.2.3.4	ICHCA	Amend first sentence as follows:	A CTU should be weatherproof unless clearly designed otherwise (e.g. flatrack)-it is so constructed that this is obviously not feasible.
8	8.2.4.4	WSC / ICS	Amend last bullet as follows:	<ul style="list-style-type: none"> Other contamination that shows <u>visible</u> signs of harbouring pests or invasive alien species (including alien species which carry risks of becoming invasive at the site of arrival of CTUs).
8	8.3.2.2	ICHCA	Would suggest combining 8.3.2.2. through to 8.3.2.5 and bullet pointing only for each issue	
8	8.3.3.5	WSC / ICS	Amend as follows:	For more information in-on access to CTU see Annex 12 section 2.3.
9	9.1.1	WSC / ICS	Amend fifth and sixth bullets as follows:	<ul style="list-style-type: none"> restrictions for concentrated loads are considered complied with; restrictions for eccentricity of the centre of gravity are considered complied with;

Chapter	Section	Submitter(s)	Comment	Proposed text
9	9.1.1	P&I Clubs	Amend fifth and sixth bullets as follows:	<ul style="list-style-type: none"> restrictions for concentrated loads <u>do not exceed container floor strength see ANNEX 6 1.2.1.4.3 (figure on load distribution)</u> are considered; restrictions for eccentricity of the centre of gravity of the combined cargo should be on athwart ship centre line and within 5% of the length from longitudinal centreline <u>are considered;</u>
9	9.5.4	P&I Clubs	Add a new paragraph 9.5.4 as follows:	<u>Smoking should only be allowed in designated areas away from the vicinity where the CTU is packed.</u>
10		P&I Clubs	10.1.12- 10.1.16 retained. Rest should reference to IMDG Code. View duplicating from IMDG Code may need to be corrected as IMDG Code is amended. Therefore unless this document is reviewed every two years along with IMDG Code then suggest only reference is made to IMDG Code.	
10	10.1.3	USA	Amend as follows (local or domestic regulations for transport by sea may also vary):	For intermodal transport, involving different modes of transport other than by sea, the rules and regulations applicable depend upon <u>upon</u> whether it is <u>a an international, national or regional movement or international transport or (e.g. transport within a political or economic union or trading zone).</u>
10	10.1.4	WSC / ICS	Amend first sentence as follows:	Transport of dangerous goods by road, rail or inland waterways may be is <u>is</u> subject to various regulations and agreements. Examples are:
10	10.1.5	IMO	It is stated that national rules can differ from the UN Recommendations, but international rules also differ from the United Nations Recommendations. The last sentence should read as follows:	<u>However, international (ADR, IMDG, ...) and national rules (CFR49, ...) may differ from the United Nations Recommendations on the Transport of Dangerous Goods. However, national rules, applicable to domestic transport, may differ from international regulations.</u>
10	10.1.5	IMO	For each figure (label or mark) it should be made clear that the figure is an example. If used for the transport of dangerous goods, the figures in the relevant regulations should be used (e.g. 10.3.8, 12.1.6, Annex 12: 4.1.1.1,...).	
10	10.1.6	USA	Amend first sentence as follows (local or domestic regulations may also authorize use of domestic regulations for international transport. In the U.S., for example, use of the IMDG Code is authorized, subject to a number of conditions and limitations appearing in 49CFR):	For <u>international</u> maritime transport, the provisions of the International Maritime Dangerous Goods Code (IMDG) Code <u>generally</u> apply.
10	10.1.7	USA	Amend last sentence as follows (proper packaging is a key provision):	The consignor is responsible <u>for ensuring</u> that packages <u>containing with</u> dangerous goods <u>are authorized and</u> bear the appropriate labels and marks.
10	10.1.8	WSC / ICS	Amend as follows:	<u>Under certain conditions, the d</u> Dangerous goods regulations <u>may impose different requirements for provide exemptions from some requirements if the</u> dangerous goods are transported in "limited quantities" or "excepted quantities". Further details are set forth in the applicable dangerous goods regulations.

Chapter	Section	Submitter(s)	Comment	Proposed text
10	10.2.2	WSC / ICS	Amend first sentence as follows:	The consignor is also responsible should also ensure that dangerous goods are classified, packaged, packed and marked in accordance with the applicable regulations.
10	10.2.3	WSC / ICS	Amend first sentence as follows:	The forwarder/carrier shipper is responsible should ensure that the goods to be transported are authorized for transport by the modes to be used during the transport operation.
10	10.2.3	WSC / ICS	Insert a new paragraph 10.2.3.1 as follows:	<u>10.2.3.1 The carrier is responsible that dangerous goods declared by the shipper are transported in accordance with applicable international and national regulations.</u>
10	10.2.6	WSC / ICS	Amend as follows:	Suitable measures to prevent fires incidents such as fires should be taken, including the prohibition of smoking in the vicinity of dangerous goods.
10	10.2.7	WSC / ICS	Amend first sentence as follows:	Packages of dangerous goods need to be examined <u>by the packer</u> and any found to be damaged, leaking or sifting shall not be packed <u>into the CTU</u> .
10	10.2.7	USA	Amend first and second sentences as follows (IMO standard practice. A non-mandatory document such as this Code should not contain compulsory language):	Packages of dangerous goods need to be examined and any found to be damaged, leaking or sifting shall should not be packed. Packages showing evidence of staining, etc., shall should not be packed without first determining that it is safe and acceptable to do so.
10	10.2.9	WSC / ICS	Amend first sentence as follows:	An overpack and unit load should be marked and labelled, as required for packages <u>(see paragraph 10.1.7)</u> , for each item of dangerous goods contained in the overpack or unit load unless markings and labels representative of all dangerous goods in the overpack or unit load are clearly visible.
10	10.2.10	WSC / ICS	Amend as follows:	The stowage and method of securing of dangerous goods in a cargo transport unit <u>in compliance with applicable international and national regulations</u> should be planned before packing is commenced.
10	10.3.1	WSC / ICS	Amend as follows:	Special care should be taken during handling to avoid damage to packages. However, if a package containing dangerous goods is damaged during handling so that the contents leak out, the immediate area should be evacuated <u>and personnel immediately moved to a safe place</u> until the hazard potential can be assessed. The damaged package should not be shipped. It should be moved to a safe place in accordance with instructions given by a responsible person who is familiar with the risks involved and knows the measures that should be taken in an emergency <u>in conformance with national regulations</u> .
10	10.3.2	WSC / ICS	Delete.	If a leakage of dangerous goods presents safety or health hazards such as explosion, spontaneous combustion, poisoning or similar danger, personnel should immediately be moved to a safe place and relevant national regulations should be complied with.

Chapter	Section	Submitter(s)	Comment	Proposed text
10	10.3.3	WSC / ICS	Amend first sentence as follows (we note that the IMDG Code under certain conditions as set out in 7.3.4.1 allow the transport of incompatible goods in the same CTU with the approval of the competent authority. We have tried to capture this with the insertion of “generally”. An alternative could be to insert a footnote at the end of the paragraph referencing 7.3.4.1):	Dangerous goods are <u>generally</u> not permitted in the same cargo transport unit with incompatible goods.
10	10.3.3	USA	Amend as follows: (IMO standard practice. A non-mandatory document such as this Code should not contain compulsory language) (Local or domestic regulations may also authorize use of domestic regulations for international transport. In the U.S., for example, use of the IMDG Code is authorized, subject to a number of conditions and limitations appearing in 49CFR)	Dangerous goods should not be packed with incompatible goods in the same CTU. Dangerous goods are not permitted in the same cargo transport unit with incompatible goods. In some instances even goods of the same class are incompatible with each other and should not be packed are not permitted in the same unit, e.g., acids and alkalis of class 8. The requirements of the IMDG Code concerning the segregation of dangerous goods inside cargo transport units are usually more stringent than those for road and rail transport. Whenever an intermodal transport operation does not include <u>international</u> transport by sea, compliance with national relevant regulations and the respective inland transport regulations may be sufficient. However, if there is any possibility that a part of the transport operation will be <u>international</u> by sea, the segregation requirements of the IMDG Code <u>generally applyare applicable</u> .
10	10.3.6	USA	Amend first sentence as follows (IMO standard practice. A non-mandatory document such as this Code should not contain compulsory language):	Packages marked with the orientation arrows “this way up” have to <u>should</u> be handled and packed with the arrows pointing upwards.
10	10.3.6	WSC / ICS	Amend as follows:	Packages marked with the orientation arrows “this way up” have to <u>should</u> be handled and packed <u>in accordance with their markings (if any). Further details regarding markings are provided with the arrows pointing upwards. Vented packages should be packed in such a way that the vents will not be blocked (see also in Annex 14, Appendix 1).</u>

Chapter	Section	Submitter(s)	Comment	Proposed text
10	10.3.8	WSC / ICS	Amend as follows (we recommend that no specific stacking heights be provided):	<p>4.1—Stacking heights, stacking load tests and stacking limitations are set forth in applicable dangerous goods regulations that should be strictly followed. Standard packagings such as drums, jerricans and boxes approved for the transport of dangerous goods are tested for a stacking height of 3 metres. The stacking test is carried out with the static gravity of 1 g (9.81 m/s²). In case of sea transport it should be considered that, due to the dynamic variation of vertical acceleration, the maximum value could be up to 1.8 g (see section 6.3). Therefore, it may be necessary to ensure stability of such stack by introducing dunnage or solid flooring between tiers of such stow. Intermediate bulk containers (IBC) are not all suitable for stacking. IBC which are manufactured or repaired after 1 January 2011 are marked with a pictogram showing either the maximum permitted stack load or an indication that the IBC cannot be stacked, as follows:</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <p>... kg max</p>  <p>Figure 10.1 Stacking limited by mass</p> </div> <div style="text-align: center;">  <p>Figure 10.2 Do not stack</p> </div> </div> <p>For IBC manufactured before that date, the approval marking on the IBC should be checked to find out whether the IBC can be stacked and, if so, for what stacking load it was tested. More details can be found in the applicable dangerous goods regulations.</p>
10	10.3.10	IMO	Delete. The amount is the prerogative of the Dangerous Goods regulations and can be changed easily.	The number of packages containing dangerous goods in excepted quantities in any cargo transport unit is limited to a maximum of 1,000.
11	11.1.1	WSC / ICS	Amend first sentence as follows:	After closing the CTU, it the packer should be ensured that all closures are properly engaged and secured.
11	11.1.1	USA	Amend second sentences as follows (IMO standard practice. A non-mandatory document such as this Code should not contain compulsory language):	If the doors of a cargo transport unit are locked, the means of locking should shall be such that, in case of emergency, they the doors can be opened without delay.
11	11.1.2	IMO	[It is not in all international transports that seals are required and thus the first sentence should read:]	[When applicable, CTUs in international transport should be sealed immediately upon completion of the packing with a seal bearing a unique identification number.]

Chapter	Section	Submitter(s)	Comment	Proposed text
11	11.1.2	WSC / ICS	Amend as follows:	The shipper should ensure that CTUs in international transport should be sealed immediately upon completion of the packing with a seal bearing a unique identification number. Countries may require that such seals shall meet the standard of ISO 17712. This standard establishes uniform procedures for the classification, acceptance and withdrawal of acceptance of mechanical seals on freight containers, bulk railcars and truck trailers. It provides a single source of information on mechanical seals which are acceptable for securing cargo transport units in international commerce. The purpose of mechanical seals is, as part of a security system, to determine whether a cargo transport unit has been tampered with, i.e. whether there has been unauthorized entry into the cargo transport unit through its doors. Seals meeting the standard of ISO 17712 shall comply with certain criteria for strength and durability so as to prevent accidental breakage, early deterioration (due to weather conditions, chemical action, etc.) or undetectable tampering under normal usage.
11	11.1.2	USA	Amend second sentence as follows (IMO standard practice. A non-mandatory document such as this Code should not contain compulsory language):	Countries may require that such seals should <u>shall</u> meet the standard of ISO 17712.
11	11.1.3	USA	Amend second sentence as follows: (SOLAS may not apply) (IMO standard practice. A non-mandatory document such as this Code should not contain compulsory language)	It should be noted that, <u>where applicable</u> , the International Convention for the Safety of Life at Sea (SOLAS) specifies <u>requires</u> that during sea transport no sources of ignition shall be present in enclosed cargo spaces where highly flammable dangerous goods are stowed.
11	11.1.4	WSC / ICS	We recommend that Annex 17 in accordance with the DSC 18 discussions be moved to the Appendices with informative material.	
11	11.2.1	USA	Amend first sentence as follows (there may be no requirement under domestic or regional regulations):	The applicable dangerous goods regulations <u>may</u> require that placards (enlarged labels), marks and other signs be are affixed to the surfaces of a <u>CTU</u> cargo <u>transport unit</u> .
11	11.2.1	USA	Amend second sentence as follows (IMO standard practice. A non-mandatory document such as this Code should not contain compulsory language):	The specifications of these placards, marks and signs and the locations where they should have to be affixed are described in detail in the applicable dangerous goods regulations.

Chapter	Section	Submitter(s)	Comment	Proposed text
11	11.2.2	USA	Amend as follows (domestic or regional requirements may also exceed the requirements of the IMDG Code):	The applicable dangerous goods regulations may require <u>other warning signs for specific risks, e.g. a sign warning of the possibility of an asphyxiating atmosphere when solid carbon dioxide (CO₂ – dry ice) or other expendable refrigerant has been used for cooling purposes or a sign warning of a potentially explosive atmosphere when vehicles or lighters have been packed into the CTU.</u> specific warning signs for cargo transport units which contain solid carbon dioxide (CO₂ – dry ice) or other expendable refrigerant used for cooling purposes. The sign aims to warn of the possibility of an asphyxiating atmosphere.
11	11.2.3	WSC / ICS	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.	
11	11.3	WSC / ICS	Insert a new paragraph 11.3.1 as follows and renumber subsequent paragraphs and cross-references accordingly:	<u>11.3.1 In conformance with paragraph 4.2.4, the shipper is responsible that all documents required by applicable international and national regulations are received from the consignor and the packer, that the documents are accurate, and, where required, are provided to the carrier before the transport commences respectively as early as required by the carrier.</u>
11	11.3.1	WSC / ICS	Amend as follows:	<u>The packer is responsible for accurately determining the gross mass of the packed CTU. Applicable international and national regulations may prescribe how the gross mass should be determined, and should be followed. [In particular for sea transport, the packer should calculate the correct payload of the loaded cargo transport unit. When possible the tare weight should be included and the gross mass should be declared. For this purpose he should obtain from the shipper a detailed packing list stating the masses of all packages and other cargo items. The gross mass of the cargo transport unit is the sum of the masses of all cargo items which have been packed, the mass of all stowage and securing material, such as pallets, dunnage or timber used for blocking, and the tare mass of the cargo transport unit. Alternatively, the gross mass of the loaded cargo transport unit may be verified by weighing the unit on a calibrated scale.]</u>

Chapter	Section	Submitter(s)	Comment	Proposed text
11	11.3.2	IMO	Amend as follows:	The packer of the CTU should inform the shipper on the identification number of the CTU (container number or vehicle number as appropriate), on the gross mass of the packed cargo and where applicable the verified gross mass of the unit and on the identification number of the seal (if applicable), thus to ensure that the <u>verified</u> gross masses and the identification numbers of each container are included in all transport documents, such as bills of lading, way bills, consignment notes or cargo manifests, and are communicated to the carrier as early as required by the carrier.
11	11.3.2	WSC / ICS	Amend as follows:	The packer of the CTU should inform the shipper on the identification number of the CTU (container number or vehicle number as appropriate), on the gross mass of the packed cargo and where applicable the verified gross mass of the unit and on the identification number of the seal (if applicable), thus to ensure that the <u>verified</u> gross masses and the identification numbers are included in all transport documents, such as bills of lading, way bills, consignment notes or cargo manifests, and are communicated to the carrier as early as required by the carrier.
11	11.3.3	USA	Amend as follows (clarifies that it is the extreme dimensions we are primarily concerned with):	Whenever the cargo projects beyond the overall dimensions of the CTU the information described in sub-section 11.3.2 should state the exact <u>maximum</u> over-height, over-width or over-length, as appropriate.
11	11.3.5	USA	Amend last sentence as follows (IMO standard practice. A non-mandatory document such as this Code should not contain compulsory language):	For all details of documentation, the relevant dangerous goods regulations <u>should</u> shall be referred to.
12	12.1.1	WSC / ICS	Amend as follows:	When applicable the consignee or the receiver of a CTU should check whether the unit is externally in good condition and without <u>significant</u> damage. When-if <u>such</u> damage is found, the receiver should document and notify it to the carrier and/or to the forwarder, as appropriate <u>CTU operator</u> . Specific attention should be paid to damage that may have influenced the condition of the cargo within the unit.
12	12.1.2	WSC / ICS	Amend as follows:	Where a seal number is stated on the transport documentation, the seal should be checked. When-if the reference number on the seal differs from the documentation or when-if the seal appears to be damaged <u>or is missing</u> , this could indicate that the CTU has been opened during transport. In such case the carrier and/or forwarder <u>CTU operator</u> should be contacted.
12	12.1.4	WSC / ICS ITF	Amend as follows:	Persons opening a CTU should be aware of the risk of cargo falling out (for details see <u>Annex 12.6+2.2.2</u>).

Chapter	Section	Submitter(s)	Comment	Proposed text
12	12.1.5 and 12.1.6	IMO	<p>The sequence of these paragraphs should be changed.</p> <p>In the light of the proposed deletion of paragraph 10.3.10, the second sentence of paragraph 12.1.6 should be amended as follows:</p> <p>12.1.5 deals with a dangerous atmosphere in the container. As the atmosphere of the container can be a danger already during the opening of the doors, a new third sentence should be inserted. It could read as follows:</p>	<p>12.1.56 CTUs with expandable refrigerants or containing fumigated cargo present a particular risk of a toxic or asphyxiant atmosphere (see subsections 11.2.2 and 11.2.3). Before <u>opening the doors and</u> entering such unit, it should be ascertained by measurement that no harmful atmosphere is present in the CTU.</p> <p>12.1.65 Some cargoes may evolve harmful fumes. Especially after long sea voyages, it has been repeatedly realized that apparently non hazardous goods such as shoes, textile products, furniture or the like evolved harmful substances to an extent making the atmosphere in the CTU dangerous. <u>Care should be taken not to come into contact with the internal atmosphere when opening the doors.</u> Therefore, any CTU should be ventilated before allowing personnel to enter, preferably by mechanically forced ventilation. If this is not available, at least sufficient natural ventilation should be provided, be leaving the doors open for a sufficient time before entering.</p>
12	12.1.6	WSC / ICS	<p>Figures 12.1 and 12.2: we do not believe that the above two placards are in conformance with the IMDG Code. In any event, the CTU Code needs to clearly state that only correct placards may be used.</p>	
12	12.1.7	USA	<p>Amend as follows (CTUs that have been fumigated should be appropriately marked. To make a blanket statement that they may not be is akin to saying that the regulations are not being followed. While this may, unfortunately, be the case in some instances, this would apply to any and every regulation. The Code cannot accommodate non-compliance):</p>	<p><u>On occasion, marks may become obliterated or lost during transport. As CTUs may then not be appropriately marked</u>As not all CTU which have been fumigated are appropriately marked, the doors and vents of the CTU should be checked. Tape applied to door gaskets or to the vents may indicate the risk of <u>fumigant presence</u>an undeclared fumigant.</p>
12	12.2.3	WSC / ICS ITF	<p>Amend as follows:</p>	<p>Suitable unpacking equipment and techniques should be used (see Annex 14 section 3.3 <u>and Annex 15</u>), so that persons involved are not placed at risk.</p>
12	12.2.6	WSC / ICS	<p>Amend first sentence as follows:</p>	<p>When any damage is detected during the unloading of the CTU, this should be documented and notified to the carrier<u>CTU operator</u> and/or forwarder<u>shipper</u> as appropriate.</p>
12	12.3.1	IMO	<p>Amend in line with paragraph 4.2.9, bullet point 5:</p>	<p>The consignee or the receiver of the CTU should consider his obligation to unless <u>otherwise agreed</u> return the CTU, after unloading, clean and suitable for the transport of any kind of cargo. This requires all cargo residues to be swept out, all packing, lashing and securing material to be removed and all debris to be cleaned up.</p>

Chapter	Section	Submitter(s)	Comment	Proposed text
12	12.3.1	WSC / ICS	Amend as follows:	Upon unpacking the CTU, it may in agreement with the CTU operator either be returned to the CTU operators' facility or transported to a new consignor/packer/shipper. Under either scenario, the consignee is responsible for completely empty and clean the CTU, and for ensuring that it is free from fumigation, other noxious substances, and plants and pests, unless otherwise agreed. The consignee or the receiver of the CTU should consider his obligation to return the CTU, after unloading, clean and suitable for the transport of any kind of cargo. This requires all cargo residues to be swept out, all packing, lashing and securing material to be removed and all debris to be cleaned up.
12	12.3.2	WSC / ICS	Amend last sentence as follows:	When wood quarantine requirements apply, timber bracings and packing/securing material of natural wood, not bearing the appropriate IPPC marking, (see Annex 14 section 1.14) should be disposed of as especially required by national or local plant protection regulations.
12	12.3.3	WSC / ICS	Amend last sentence as follows:	In case of doubt with regard to appropriate cleaning measures, the owner of CTU operator of the CTU should be contacted.
12	12.3.4	USA	Amend as follows (provides consistency with dangerous goods regulations):	When the CTU offers no further hazard, the dangerous goods placards, orange panels plates and other markings referring to dangerous goods should be removed, masked or otherwise obliterated.
12	12.3.4	WSC / ICS	Amend as follows:	When the CTU offers no further hazard, the dangerous goods All placards, orange plates and other markings <u>referring to the last shipment, including, where applicable, markings</u> referring to dangerous goods, should be removed, masked or otherwise obliterated.
12	12.3.5	WSC / ICS	Delete (as mentioned previously, in so-called "street turns" the CTU will be transported directly to the new consignor/packer/shipper).	CTUs should be returned to the CTU operator in line with Annex 12 Part 8.

Chapter	Section	Submitter(s)	Comment	Proposed text
13	13.1.1	UK	Amend as follows and renumber existing paragraphs 13.1.2 to 13.1.4 accordingly:	<p>13.1 Qualification of planners and packers<u>Introduction</u></p> <p>13.1.1 The successful application of this Code of Practice concerning the Packing of Cargo Transport Units and the achievement of its objectives are greatly dependent on the appreciation by all persons concerned of the risks involved and on a detailed understanding of the Code of Practice. This can only be achieved by properly planned and maintained initial and retraining programmes for all persons concerned with the packing of cargo transport units.</p> <p>13.1.2 Training of persons employed by the entities given in chapter 5.1.5 can be undertaken in-house through the use of designated personnel alternatively external or distance (e-learning) training providers may be used. However, when entities using external training providers should ensure that such providers can provide training to meet the requirements of this Code. Persons responsible for planning and supervision of packing should be fully knowledgeable about all technical, legal and commercial requirements of this task and on all risks and dangers involved. They should know the customary terminology in order to communicate effectively with consignors, forwarders and the persons who do the actual packing.</p>
13	13.1.2	WSC / ICS ITF	Amend as follows:	Personnel engaged in the actual packing should be trained and skilled in doing this work and understand the relevant terminology in order to comply with the instructions of the planner. They should be aware of the risks and dangers involved <u>including safe manual handling of packages (see Annex 15).</u>
13	13.2.1	UK	Amend as follows:	The regulatory authority should <u>work with industry to</u> establish minimum requirements for training and, where appropriate, qualifications for each person involved, directly or indirectly, in the packing of cargo in CTUs, particularly in relation to dangerous cargoes.
13	13.2.1	USA	Amend as follows (dangerous cargoes are not defined; dangerous goods are defined and regulated):	The regulatory authority should establish minimum requirements for training and, where appropriate, qualifications for each person involved, directly or indirectly, in the packing of cargo in CTUs, particularly in relation to dangerous <u>goods-cargoes.</u>
13	13.2.2	UK	Delete.	Regulatory authorities involved in the development or enforcement of legal requirements relating to the supervision of the safety of the transport by road, rail and sea should ensure that their personnel are adequately trained, commensurate with their responsibilities.

Chapter	Section	Submitter(s)	Comment	Proposed text
13	13.3	UK	Amend as follows:	<p>13.3 Training</p> <p><u>13.3.1 Personnel engaged in the packing of CTUs should be trained in the contents of this Code commensurate with their responsibilities. Employees should be trained before assuming responsibilities and shall only perform functions, for which required training has not yet been provided, under the direct supervision of a trained person. Such training should be followed by a sufficient period of practical assistance to experienced planners and packers.</u></p> <p>13.3.12 All persons should receive training on the safe transport and packing of cargo, commensurate with their duties. The training should be designed to provide an appreciation of the consequences of badly packed and secured cargo in CTUs, the legal requirements, the magnitude of forces which may act on cargo during road, rail and sea transport, as well as basic principles of packing and securing of cargoes in CTUs. <u>Topics for consideration, to be included in the training as appropriate, are given in Chapter 1.4 and Annex 20.</u></p> <p>13.3.2 All persons should receive detailed training concerning specific requirements for the transport and packing of cargo in CTUs which are applicable to the functions that they perform. Such training should be followed by a sufficient period of practical assistance to experienced planners and packers.</p> <p>13.3.3 The adequacy of the knowledge of any person to be employed in work involving the packing of cargo in CTUs should be verified or appropriate training provided. This should be supplemented by periodic training, as deemed appropriate by the regulatory authority.</p> <p>13.3.4 Topics for consideration, to be included in the training as appropriate, are specified in Annex 20.</p> <p><u>13.4 Records</u> <u>Records of training received according to this chapter should be kept by the employer and made available to the employee or competent authority, upon request. Records should be kept by the employer for a period of time established by local regulatory practice.</u></p>
13	13.3.2	USA	Amend the last sentence as follows (the sentence as presently written does not make sense):	<p>All persons should receive detailed training concerning specific requirements for the transport and packing of cargo in CTUs which are applicable to the functions that they perform. Such training should be <u>supplemented by a period spent assisting knowledgeable planners and packers so that practical experience can be gained</u>followed by a sufficient period of practical assistance to experienced planners and packers.</p>