

**Informal meeting on Code of Practice for Packing of Cargo Transport Units
at the request of the United Nations Economic Commission for Europe Working Party on
Intermodal Transport and Logistics**

Geneva and virtual, 29-30 March 2023

Comments to proposal in Documents 4, 5, 7 and 8

Submitted by the MariTerm AB

Background

This document contains comments on some proposals in Documents 4, 5, 7 and 8, where it has been deemed helpful to the Secretariat and the members of the Informal Group of Experts to provide alternative wording in writing in advance of the meeting, see text in bold and red below.

Comments on document 4 - Blocking

We don't agree with the proposed insertion of a stop sign in connection to Figure 7.13. This is very light cargo (parts of industrial fans) without any sharp edges and it is intended as a good example to show when dunnage bags can be used effectively where it is not possible to lash the cargo and very impractical to try to arrange wooden blocking structures. So, instead of the changes proposed in Document 4, we suggest that the wording of the caption of Figure 7.13 is amended as follows:



“Figure 7.13 Irregular shaped packages **without sharp edges** blocked with dunnage bags”

Figures 7.14 and 7.15 represents very common blocking devices in road vehicles and we do not support removing them. Of the two new images proposed to be included as replacements, the second is a rather unique system which is not very clearly illustrated in the submitted picture. We thus propose to retain the two original figures complemented with one of the new figures and to amend the captions as follows:



“Figure 7.14 Floor mounted stanchions”

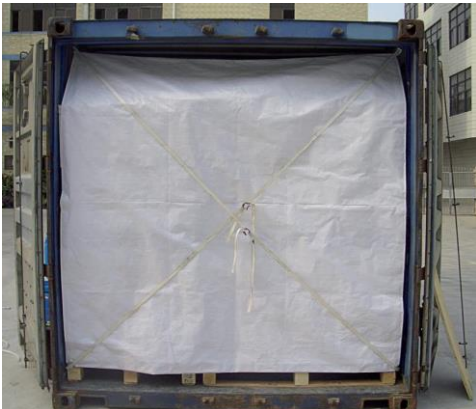


“Figure 7.15 Blocking cross beams **with limited strength**”



“**Figure 7.16 Blocking cross beams with greater strength**”

If tarpaulins are used as suggested in Document 4, it should be very clearly stated that they are not used for securing the cargo to move during transport, only to prevent light cargo from falling out when the doors are opened. If the new Figure of a tarpaulin is included, the caption should be amended as follows:



“Figure 7.xx: Tarpaulin **used solely** to prevent small **and light** packages falling out when stowed close to the door”

Figure 7.52 illustrates a very common, relatively strong and practical solution for preventing cargo from sliding of flat racks. This example should be retained in the revised Code proposal.

The proposed wording in Annex II (for dunnage bags) does not require the guidelines from Association of American Railroads to be followed, it only provides information on what marking of Level in accordance with this guideline can be used for. The guideline is the only widely recognized criteria for dunnage bags and marking of Level in accordance with it is fairly common. The proposed clauses 4.5 and 4.6 should remain, but the words “**marked Level 3 and**” should be removed from the recommendation of marking in Clause 4.6.

Comments on document 5 - TSL

There was a vital piece of information missing in the caption for Figure 7.38. Instead of changing the labels regarding the strength of the superstructure of the trailers (from EN 12642-XL to EN 12642-L) the caption should be amended as follows:

“Figure 7.38: During transport **in sea area B** in a ~~road~~-vehicle complying with standard EN 12642-XL, packages marked with TSL 4 or better may be secured by blocking against the CTU’s sides only, whilst packages marked with TSL 5 needs additional securing measures, e.g. top-over lashings.”

As correctly pointed out in Document 5, the diagram and instructions in Appendix 5 has been simplified by omitting inclination angles to simulate forces in the longitudinal direction during sea transport. The proposal in Document 5 to use the same test angles in both transverse and longitudinal directions is a very practical and sound suggestion. It may however be amended to allow the use of formula given in Document 5 to enable the user of the Code to test for any combination of acceleration, by amending Clause 5.1 as follows:

“**When testing in longitudinal direction for sea transport, the corresponding test angle obtained by Figure 7.98 for the transverse direction may be used, or the required inclination angle, α , can be calculated by the following formula:**

$$\alpha = \arcsin\left(\frac{r + \gamma \cdot \sqrt{1 + \gamma^2 - r^2}}{1 + \gamma^2}\right), \quad \text{where } r = c_{x,y} - \gamma \cdot c_z”$$

Comments on document 7 - Definitions

The purpose of the definitions is to help the reader of the Code to understand concepts that are introduced in the text. Thus, they should all be as clear and helpful to reader as possible, but of the definitions concerning functional roles this is particularly important for two of them: the definitions of “Consignor” and “Shipper”, since their use in other documents is sometimes conflicting with the Code and there is an obvious risk of confusing the two terms.

Thus, as a minimum of changes to Chapter 2, the following proposals in Document 7 are strongly supported:

- Remove the words **~~“If the consignor contracts the transport operation with the carrier, the consignor will undertake the function of the shipper and”~~** from the definition of “Consignor”.
- Add a functional description of the role in the definition of “Shipper” in line with the wording **“The party responsible for arranging and managing the transport of the CTU and its cargo”**.

There is no need in any definition to explain that an entity can take on another functional role. That is true for all parties and is already stated in Clause 4.1.1.

In addition, all definitions of “functional roles” should include an actual description of what that functional role is. While the current definition of “Shipper” is helpful in many cases it does not in any way clarify to the reader of the Code what that party contributes to the transport. A number of situations have been pointed out in Document 7 where it will be impossible to identify the “Shipper” as per the current situation.

Comments on document 8 – Chains of responsibility and information

As a general note, we are not in favour of expanding the text with responsibilities that are not directly related to the packing of the CTU, securing of the CTU or the cargo within it or proper handling of the CTU during transport. E.g. we believe the responsibility for the road haulier to ensure that the driver follows applicable regulations for rest and fatigue is outside the scope of the Code.
