



# Addressing the Sea Container Pathway

A Side Session at the Commission on Phytosanitary Measures

Thursday, 4 April 2019 Rome



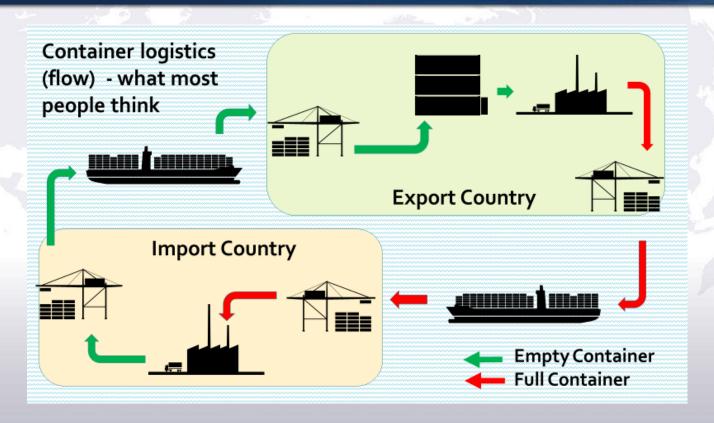


Lars Kjaer World Shipping Council

James Hookham Global Shippers Forum

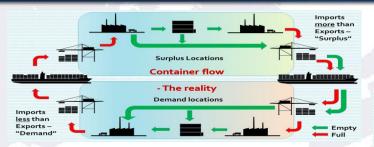


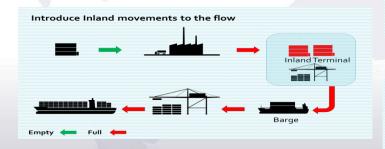
### **Container logistics: The Myth**

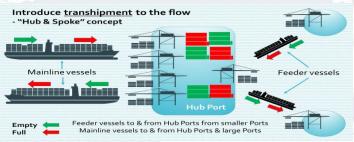


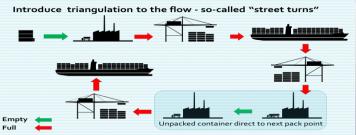


### **Container logistics: The Reality**



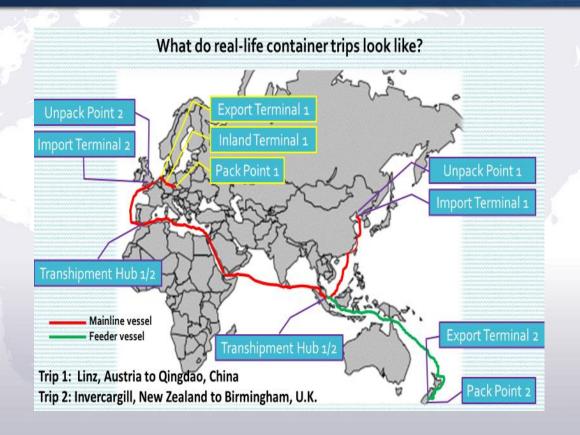








### **Container logistics: The Reality**





#### **Container logistics: Summary**

- Container flows are complex
- Involve:
  - multiple border crossings
  - multiple handovers of control
  - o multiple modes of transport
  - o multiple actors
- Shipping company has little direct control over or access to containers during container trips
- Exception: Container depots, but...
  - Not always part of every container trip



#### **CTU Code**

- Industry took the initiative to develop CTU Code
- Collaborative effort between industry stakeholders, IMO, UNECE and ILO
- CTU Code approved by all three UN bodies 2013-2014
- Consists of Code, Annexes and Informative Material
- Voluntary instrument constituting Best Practices. May be incorporated or referenced in national law.
- IMO Circular on Due Diligence (MSC 1/Circ. 1539





## CTU Code and Pest Contamination (1)

#### **Table 1: Summary of contents**

Chapter		Referenced annexes		Related informative material <sup>1</sup>	
1	Introduction			IM1	Consequences of improper packing procedures
2	Definitions				
3	Key requirements				
4	Chains of responsibility and information	A1 A2	Information flow Safe handling of CTUs	IM2	Typical documents related to transport
5	General transport conditions	А3	Prevention of condensation damages		
6	CTU properties	A4	Approval plates	IM3	CTU types
7	CTU suitability	A4	Approval plates		
8	Arrival, checking and positioning of CTUs	A4 A5 A6	Approval plates Receiving CTUs Minimizing the risk of recontamination	IM4	Species of concern regarding recontamination
9	Packing cargo into CTUs	A7 A8	Packing and securing cargo into CTUs (supplemented with appendices 1 to 5) Access to tank and bulk tops, working at height	IM5 IM6 IM7 IM8	Quick lashing guides Intermodal load distribution Manual handling Transport of perishable cargo
10	Additional advice on the packing of dangerous goods				
11	On completion of packing			IM9	CTU seals
12	Advice on receipt and unpacking of CTUs	A5 A9	Receiving CTUs Fumigation	IM10	Testing CTUs for hazardous gases
13	Training in packing of CTUs	A10	Topics for consideration in a training programme		



# and Pest Contamination (2)

"All persons involved in the movement of CTUs\* also have a duty to ensure, in accordance with their roles and responsibilities in the supply chain, that the CTU is not infested with plants, plant products, insects or other animals...".

(CTU code, Chapter 4 "Chains of Responsibility and Information", para. 4.1.4)





## IPPC Commission Recommendation 10/2015/01

IPPC Commission "Recommendation CPM-10/2015/01 on Sea Containers" (2015)\*:

- Confirms that 'the packing of sea containers with cargo is the most likely stage in the sea container supply chain at which contamination can occur'.
- Encourages National Plant Protection Organizations (NPPOs) to, inter alia, support the implementation of the relevant parts of the CTU Code.
- ❖ Sets out the principle that any measures to mitigate pest contamination risks should be justified, practical and proportionate.

<sup>\*)</sup> Now referred to as R-06 (https://www.ippc.int/en/publications/84233)



## **Joint Industry Guidelines**

Prevention of Pest Contamination of Containers: Joint Industry Guidelines for Cleaning of Containers



Prepared by:











## **Important** definitions

#### "Pest contamination":

Visible forms of animal, insects or other invertebrates (alive or dead, in any lifecycle stage, including egg casings or rafts), or any organic material of animal origin (including blood, bones, hair, flesh, secretions, excretions); viable or nonviable plants or plant products (including fruit, seeds, leaves, twigs, roots, bark, intact or broken wood packing material, including dunnage); or other organic material, including fungi, or soil or water; where such products are not manifested cargo within the container.

(Source: CTU Code)

#### "Visible":

Detectable by the human eye without the aid of any supporting instruments or aids such as magnifying glasses and microscopes, This applies to both the exterior and interior of the container.

However, safety and other operational constraints in depots and terminals may limit inspection for visible trace soil and other pest contamination on understructures and roofs.

(Source: Joint Industry Guidelines)



# Container cleanliness and Joint Industry Guidelines

- Any empty container used for the carriage of dry, special or reefer cargo should, when dispatched from a container depot under the control of the shipping company, be "clean".
- "Clean" means that the empty container's exterior and interior and, for reefer containers, ventilation inlet grilles and floor drain holes, should, at the time of dispatch, have no visible presence of any of the following:
  - Soil
  - Plants/plant products/plant debris
  - Seeds
  - Moths, Wasps, Bees
  - Snails, Slugs, Ants, Spiders
  - Mould and Fungi
  - Frass (insect and bird droppings or waste)
  - Egg sacs
  - Animals, animal parts/ blood/excreta and reproductive components or parts thereof
  - Other contamination that shows visible signs of harbouring pests.



#### Container cleanliness and Joint Industry Guidelines

(continued

- ✓ Contain recommendations on cleaning methods for various types of visible pest contamination.
- ✓ In cases of doubt, local National Plant Protection Office or Quarantine Office should be contacted.
- ✓ Do not replace local regulatory pest contamination measures and requirements.
- ✓ Do not replace individual container operators' cleaning guidelines.
- ✓ Are additional to industry guidelines regarding nonpest contamination of containers.

## Scope of the CTU Code



- 1. Dangerous Goods
- 2. Overweight or uneven weight distribution
- 3. Badly restrained loads
- 4. Pest contamination
- 5. Bulk loads
- 6. High-risk loads

## Developing the CTU Code



- Establish a revision cycle for the CTU Code with sponsors to ensure it remains up to date. Establish communication channels for key developments between updates
- Expand guidance on the minimizing pest contamination in cooperation with the IPPC Sea Container Task Force, national PPOs, and the CPM
- Revise urgently advice and guidance on packing of certain Dangerous Goods, in view of recent ship-board fires

## Promoting the CTU Code



- Compile summary documents for shipping lines and shippers own front-line staff to brief contracted container packers on desired safety & environmental standards
- 2. Consider the development of a **mobile phone app** to provide guidance to packers, based on CTU Code recommendations
- 3. Development of an **awareness-raising campaign** amongst container packing entities of their responsibilities under the CTU Code, including avoidance of pest contamination

Aim to deliver first output by September 2019

## Best Practice vs Regulation



- Best practice delivered through contractual relationships and procurement specifications
- Potent means of securing response to wider range of container packing issues
- Regulation requires education, enforcement & sanctions
- Burden falls on state agencies to adopt, implement & enforce any new regulation
- The task of identifying and educating the target audience remains the same
- Regulation will force the problem into the shadows. Best practice encourages visibility





## Questions and comments





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