MINUTES OF THE SEA CONTAINERS TASK FORCE, IC SUB-GROUP

Virtual meeting, Wednesday, 19 May 2021, 22:00–00:00 (CET)

1. Opening of the meeting

1.1. Opening

[1] The IPPC Secretariat (Secretariat) opened the meeting and welcomed Mr Dominique PELLETIER as the new IC Lead for the IC Sub-group SCTF (SCTF). The SCTF joined together to thank Ms BLOEM for her work as the previous Lead for the SCTF.

1.2. Election of the Chairperson

[2] SCTF selected Mr Greg WOLFF (Canada) as Chairperson of the meeting. The Chairperson opened the meeting by drawing attention to core elements for SCTF to include, and exclude, in its proposals and recommendations to CPM.

2. Adoption of the Agenda

[3] As had been agreed at the previous meeting, SCTF would hold monthly meetings (with the exception of August 2021), focused on specific core questions raised in CPM 2021/INF/13[1] (. The Chairperson suggested that the agenda for this meeting would consider core questions 1 through 9. SCTF agreed and the agenda was adopted as presented in Appendix 1.

3. Administrative matters

3.1. Participants

[4] All SCTF members[2] and observers were present with the expectation of Mr Frederick MAKATHIMA (NPPO of Kenya) and Ms Özlem SOYSANLI (WCO representative). Mr Brent LARSON and Mr Artur SHAMILOV from the IPPC Secretariat were also present.

4. Addressing core questions raised at CPM-15 (2021) in Update from the Sea Containers Task Force - Proposal for a Path Forward for the Sea Container Task Force (CPM 2021/INF/13)

4.1. What have been the main accomplishments that regions have seen over the past five years in their respective efforts to address the issue of pest risk associated with sea containers? What have the regions learned about what works and what does not?

[5] The Chairperson had called for written submissions of salient information and viewpoints to be included in the final report to be presented to CPM, explaining that submissions would be collected throughout the year until the report was finalized in December 2021. The Chairperson also urged the SCTF to focus on key items, as it may not be able to address every issue given the tight timeline.

[6] The SCTF meeting participants discussed the appropriateness of including cargo in the measures to be proposed by the group. Some types of cargo already undergo risk assessments, and there are import requirements in place to mitigate risks; with some participants suggesting that further regulation in that

[1] CPM 2021/INF/13: http://www.ippc.int/en/publications/89566/

[2] SCTF membership list: https://www.ippc.int/en/publications/85435/

area was not necessary or may be counterproductive to SCTF proposals. It was pointed out that not all types of cargo have import requirements, and that cargo may also be contaminated during the packing stage in particular. One participant drew attention to the Report of the Second Meeting of the IPPC Sea Container Task Force from November 2018, which states:

> *The participants noted that risk profiles of cargoes can contribute to the pest risks associated with sea containers. In addition, the type of commodity and the handling and storage of certain commodities prior and during packing can influence and result in the contamination of containers. The experience accumulated with wood packaging material presents a good example for clarifying how to approach cargo/sea container contamination risks and management. Packing is the highest risk stage for contamination of sea containers. Essentially, with respect to the work of the SCTF, risks related to cargo should be considered up to and including the packing stage in that the cargo and/or its method of handling/storage may itself be a source of potential contamination of containers, i.e., once the container is packed and in transit the potential contamination of the container itself is the risk pathway being considered. It was stressed that, for risks directly related to agricultural cargo (and some non-agricultural cargo), individual country import requirements and some IPPC standards already exist and we must be careful not to introduce an unworkable degree of complexity into the SCTF's work by focusing on cargo after the packing stage has been completed.*

[7] The Chairperson turned to the main accomplishments of the SCTF thus far in regards to communications and surveys. Participants explained that the work of SCTF had led to increased awareness of issues of sea container contamination.

[8] The difficulty in reaching all parties along the complex network of sea container stakeholders was stressed by several participants. Better outreach is necessary if outcomes are to be substantive.

[9] The implementation of national surveys had been interrupted by the COVID-19 pandemic, although some countries had been successful in carrying them out, and these were useful in informing outreach strategies and in understanding how risks were identified and managed.

[10] The SCTF concluded:

- *Written submissions to be included in the final report of the SCTF can be submitted through to December.*
- *More and better outreach is needed if SCTF outcomes are to be substantive.*

4.2. What have we learned over these past five years about sea containers and the comparative level of risk they pose in terms of harbouring and spreading pests? Is the situation better or worse than five years ago? What are CPM members' view and experience on this?

[11] Compared to five years ago, there had not been much change in the situation. This is because there are no measures, either for countries or for industry, in place to manage sea container risk.

[12] Several members pointed to the lack of data and statistics in this area. If the impact of control measures or treatments could be quantified, this could allay concerns from industry regarding the cost of such measures.

[13] The complexities of sea container logistics create obstacles for an effective model. Containers move frequently within and between regions, and may carry a range of cargo. There are some parallels with ISPM 15 (*Regulation of wood packaging material in international trade*), which was shown in studies to lead to a reduction of risk. The challenge is that the risk for wood packing material occurs primarily at the time of production and a single treatment is effective to reduce the risk. In the case of sea containers, risk can occur at any time, and thus requires regular periodic treatment. One member drew

attention to the possibility of contamination in the time between when a container is cleaned and packed and when it reaches the terminal. Any recommendation should take this factor into consideration.

[14] Also requiring consideration in any recommendation is the considerable risk posed by empty sea containers. Any cleaning of containers takes place before they are packed, not before they are exported. This means empty containers may be returned by consignees without being cleaned, and may then carry contamination when they are exported.

[15] A number of participants spoke of the need for both periodic treatment of containers and regular inspections. Periodic treatment is needed to manage residual risks left by cargo, while regular inspections are necessary to manage opportunistic pests. There was support from a number of participants for a model that would couple inspections with periodic treatment. One participant called on interested SCTF participants to work offline on developing this approach as a possible workable model.

[16] It was emphasized that no model could achieve 100 percent risk reduction. A number of questions were also raised on such a model: What would be acceptable risk taking into account cost–benefit? Who would bear the cost of the treatment and inspection programme? Who would bear the cost of monitoring such a programme?

[17] The SCTF concluded:

- *More available data on the cost–benefit of phytosanitary control measures may allay industry concerns.*
- *Contamination risk between the time of packing and export should be taken into consideration.*
- *Risks associated with empty sea containers should be taken into consideration.*
- *One possible model is to pair periodic treatment and regular inspections.*

4.3. Is the industry using any part of the IMO/ILO/UNECE Code of Practice for Packing of Cargo Transport Units (CTU Code) to improve things? Are there any data on the level of uptake of the CTU Code over the last five years? What role does the CTU Code play in addressing NPPOs' concerns on preventing the spread of pests? Does this CTU Code have a potential valuable role in the future from a phytosanitary standpoint?

[18] A number of participants felt the CTU Code had not raised awareness of pest contamination. They pointed, for example, to the lack of mention of phytosanitary control issues in shipping industry publications. In an industry survey conducted in one country, respondents did not mention the CTU Code when answering about their training or cleaning processes. In another country, container freight stations made use of the CTU Code in reference to packing operations but did not sufficiently implement its pest-control measures.

[19] Conversely, many participants said that the CTU Code had indeed raised the awareness of the issue of pest contamination. Industry bodies are aware of pest contamination issues and of their importance. Learnings and recommendations from the CTU Code are implicitly adopted by many stakeholders as they manage pest risk similarly to food hygiene standards, with widespread understanding of the need to observe those standards.

[20] Promoting the CTU Code is beneficial to SCTF because it covers all relevant parties of the container transport chain and can strengthen weak links that may cause quarantine risks in this transport chain.

[21] The CTU Code is undergoing a process of amendments at present. One participant called on contracting party representatives on SCTF to provide input in relation to pest contamination of sea

containers and their cargo to inform the revision process. Updates to the CTU Code could facilitate a contribution by maritime authorities to sea container cleanliness through inspection programmes.

[22] While awareness of the CTU Code is greater than it was five years ago, it is not evident that awareness has reached all operators involved in the supply chain. A number of participants spoke of the particular difficulty reaching packers, which is a heterogenous group lacking global representation. Engaging with packers was of paramount importance, despite such challenges.

[23] Another important group to engage is large-scale shippers, such as major international retailers. A possible recommendation would be for shippers to put pest-control or cleanliness requirements into their shipping contracts. This action would also reach packers directly. A similar strategy had already been adopted by some shippers to in response to ISPM 15. In order to reduce their liability and the risk of shipments being rejected because wood packing material was not ISPM 15-compliant, they incorporated the necessary requirements into their contracts with their suppliers.

[24] One participant noted that there was positive movement in terms of increased dialogue with shippers and packers, but efforts to that end would not be fully felt before the SCTF mandate expired.

[25] Planned workshops targeting retailers and logistics companies, as proposed at the Third Meeting of the IPPC Sea Container Task Force in 2019, had been disrupted by COVID-19. Including packers in these activities was important moving forward. The importance of such a workshop in informing the decisions of CPM was noted by one participant.

[26] COVID-19 has had a significant impact on the shipping industry, and it is important to keep in mind that pre-COVID data may not be reflective of the current situation.

[27] The Chairperson noted that recommendations to CPM must not have unacceptable impact on trade. Supply chain logistics are time-sensitive and highly complex. Any measure that added to supply chain processes had a potential to impact fluid trade. Measures put forward by SCTF must be cognizant of this.

[28] The SCTF concluded:

- *Promoting the CTU Code can benefit the work of SCTF.*
- *Contracting Party members of SCTF are called on to provide input on the process of revising the CTU Code.*
- *Increased outreach to packers is necessary.*
- *Shippers, as major drivers of sea container movement, can play a useful role in requiring action on pest control and cleanliness from their suppliers.*
- *Proposed international workshop should be held, and should include packers.*
- *SCTF recommendations must not have an unacceptable impact on trade.*
- *Final report to CPM must underscore the complexities of supply chain logistics.*

4.4. What have we learned about the various industry components, logistics chains, and their willingness and capacity to partner with NPPOs in addressing the pest risk issue?

[29] The Chairperson pointed to the importance of considering the pathways leading to sea container contamination. One participant noted two pathways in particular: contamination from the environment and contamination from cargo. Contamination from cargo could be addressed with internal guidelines from carriers. Substantive exposure to risk occurred during the intermodal period between packing and export. Another participant said that shipping companies were willing and able to clean containers. In the countries or regions where there were depots, consignees were more motivated to clean containers after unloading before they were returned.

[30] One key industry component that seemed overlooked was empty containers, which were especially problematic for certain countries. Although consignees are contractually obligated to clean a container

after it is unpacked, empty containers are sometimes not returned to a depot and are sent instead directly to shippers or to a maritime terminal for re-export.

[31] The SCTF concluded:

- *Pathways for sea container contamination should be examined and taken into consideration.*

4.5. Given there are many players in the supply chain who can contribute to cleanliness, is there a need to consider additional guidelines and industry practices targeted at these various entities?

[32] A number of participants said that existing guidelines or regulations were sufficient, for example the CTU Code and *Sea container supply chains and cleanliness: An IPPC best practice guide on measures to minimize pest contamination*. The challenge was how to best communicate that guidance to the disparate and multilanguage stakeholders involved in sea container logistics around the world. What was the best way to disseminate information? How could information be targeted to the appropriate audience?

[33] A number of participants spoke about the potential and suitability of new media to address this challenge, smartphone applications in particular. Smartphone applications are already in development for use in the shipping industry, and could be developed to target frontline workers, such as packers. Smartphone applications also have the potential to resolve data-deficiency issues by providing stakeholders a ready way to complete surveys on cleanliness.

[34] It was noted that packers in particular may not have access to smartphones, and that non-language materials may be necessary to reach this audience because of literacy concerns.

[35] The SCTF concluded:

- *Apps may be effective in communicating guidance on sea container cleanliness*.

4.6. Do incentives work? Or do NPPOs and governments need to rely more on applying regulatory actions at their borders to reject shipments and force industry to alter its behaviour?

[36] One participant said that regulation of pest contamination risk was lax, despite extensive incentives for its management. Only regulatory measures would change behaviours.

[37] Conversely, a number of participants said a hard regulatory approach would have an impact on sea container logistics by slowing trade and increasing costs. Regulatory systems also required substantial resources; this might pose a challenge for countries.

[38] Some participants said that it was important to find a balance between incentives and regulation, and this would achieve the most effective and efficient outcome. One participant noted the usefulness of the “compliance triangle” in this regard. High-cost, targeted, hard measures are applied to those who chose not to comply; those who do not want to comply, or try to comply but don't always succeed, are deterred by broader measures and are helped to comply; and things are made easy for those willing to do the right thing using measures such as education, advice and engagement, which have the lowest cost.

[39] One participant said that a voluntary system can incentivize industry by reducing barriers, and pointed to the success of a voluntary system in their country.

[40] The SCTF concluded:

- *Understanding support for regulatory action is important to inform the work of SCTF.*

4.7. What are the major constraints that may limit the success of an effective voluntary programme which would induce the industry to increase the cleanliness of containers?

[41] One participant said that inadequate depots and poor sanitation in some countries were a key limiting factor, as repositioning containers were polluted during storage or exported directly without cleaning.

[42] Many participants identified effective communication of voluntary measures as a major constraint. It is difficult to communicate with packers and small-scale importers, and these two groups may wilfully or inadvertently disregard incentives, or regulations, that are in place to manage pest risk.

[43] One participant informed that voluntary schemes can be effective, as they allow industry to dedicate resources as they see appropriate. For a voluntary scheme to be effective, however, the return on invest must be sufficient to incentivize participation. In this regard, major retailers are the most incentivize to comply because they rely on just-in-time supply chains where delays and detentions have major implications.

[44] The SCTF concluded:

- *Engaging with major retailers is a missing piece of the puzzle.*
- *An overall systems approach may be the most effective strategy, with some parts voluntary and some parts mandatory.*

4.8. Is there any opportunity and value for alignment of specific activities that contracting parties should consider? Specifically, what are the points in the logistics chain that have the greatest potential value in terms of phytosanitary alignment?

[45] Although packers are a diverse group that is hard to reach, effective communication with them is likely to have the most impact.

[46] One possible strategy would be for a container to have phytosanitary inspection at the same time as its safety inspection.

[47] The SCTF concluded:

- *A possible model would see a phytosanitary inspection happen concurrently to a container's safety inspection.*

4.9. What are the various activities or practices that could be implemented by contracting parties which is consistent with their operational capacity and national legislation, to achieve the common outcome of minimizing phytosanitary risk?

[48] One participant asked if there were recent data available on pest contamination that could inform the work of SCTF. Another participant said that recent data had been provided to CPM.

[49] A number of participants suggested cataloguing all measures available for phytosanitary control of sea containers. This would be useful for assessing the pros and cons of each measure and for making recommendations.

[50] The SCTF concluded:

- *Compile list of available phytosanitary control measures and assess their strengths and weaknesses.*

5. Any other business

6. Date and arrangements of the next meeting

[51] The participants of SCTF agreed to have next virtual meeting on 22 June 2021, with the Secretariat advising on timing as soon as possible. The next meeting would focus on the potential value of an international workshop.

7. Close of the Meeting

[52] The Chairperson thanked the participants for their contributions and the Secretariat closed the meeting.

APPENDIX 1

AGENDA

SEA CONTAINERS TASK FORCE (SCTF)

Wednesday, 19 May 2021, 22:00–00:00 (CET)

Agenda Item		Document No.	Presenter
1.	**Opening of the Meeting**		
1.1	Opening		Secretariat
1.2	Election of the Chairperson		Secretariat
2.	**Meeting Arrangements**		
2.1	Adoption of the Agenda		Chairperson
3.	**Administrative Matters**		
3.1	Participants	https://www.ippc.int/en/publications/85435/	SHAMILOV
4	**Addressing core questions raised at CPM-15 (2021) in *Update from the Sea Containers Task Force - Proposal for a Path Forward for the Sea Container Task Force***	CPM 2021/INF/13 [3]	
4.1	What have been the main accomplishments that regions have seen over the past five years in their respective efforts to address the issue of pest risk associated with sea containers? What have the regions learned about what works and what does not?		Chairperson
4.2	What have we learned over these past five years about sea containers and the comparative level of risk they pose in terms of harbouring and spreading pests? Is the situation better or worse than five years ago? What are CPM members' view and experience on this?		Chairperson
4.3	Is the industry using any part of the IMO/ILO/UNECE Code of Practice for Packing of Cargo Transport Units (CTU Code) to improve things? Are there any data on the level of uptake of the CTU Code over the last five years? What role does the CTU Code play in addressing NPPOs' concerns on preventing the spread of pests? Does this CTU Code have a potential valuable role in the future from a phytosanitary standpoint?		Chairperson
4.4	What have we learned about the various industry components, logistics chains, and their willingness and capacity to partner with NPPOs in addressing the pest risk issue?		Chairperson
4.5	Given there are many players in the supply chain who can contribute to cleanliness, is there a need to consider additional guidelines and industry practices targeted at these various entities?		Chairperson

[3] CPM 2021/INF/13: http://www.ippc.int/en/publications/89566/

Agenda Item		Document No.	Presenter
4.6	Do incentives work? Or do NPPOs and governments need to rely more on applying regulatory actions at their borders to reject shipments and force industry to alter its behaviour?		Chairperson
4.7	What are the major constraints that may limit the success of an effective voluntary programme which would induce the industry to increase the cleanliness of containers?		Chairperson
4.8	Is there any opportunity and value for alignment of specific activities that contracting parties should consider? Specifically, what are the points in the logistics chain that have the greatest potential value in terms of phytosanitary alignment?		Chairperson
4.9	What are the various activities or practices that could be implemented by contracting parties which is consistent with their operational capacity and national legislation, to achieve the common outcome of minimizing phytosanitary risk?		Chairperson
5.	**Any other business**		Chairperson
6.	**Date and arrangement of the Next Meeting**		Chairperson
7.	**Close of the Meeting**		Chairperson / Secretariat