



CARGO INTEGRITY GROUP

Joint statement by partners in the Cargo Integrity Group on the avoidance of visible pest contamination of freight containers and their cargoes

Addressed to the national and international plant protection agencies and other agencies responsible for facilitating international trade

The partners in the Cargo Integrity Group are the Container Owners Association (COA), the Global Shippers Forum (GSF), the International Cargo Handling Co-ordination Association (ICHCA), the TT Club and the World Shipping Council (WSC).

We work as a group on improving awareness of the need for the safe and secure packing, handling and transport of cargo transport units, including intermodal freight containers, and promoting use of the guidance contained in the 'Code of Practice for the Packing of Cargo Transport Units' published by the IMO, the UNECE and the ILO (the CTU Code).

We jointly make the following statement on behalf of our respective memberships:

1. We share a collective ambition that international trade be conducted in a safe, secure and environmentally sustainable manner and are working to develop, improve and raise awareness of applicable standards and practices that contribute to that goal.
2. We recognise the risks to natural resources, forestry and agricultural industries, and to national economies reliant on them, arising from the transfer of invasive pests between different natural ecosystems. We further recognise that the international movement of goods can present a potential route for the transfer of such pests between countries. However, this is just one of many potential means of transfer and the vast majority of trade takes place in environments where these risks do not arise or are insignificant.
3. Liner ships transport approximately 60 percent of the value of seaborne trade or more than USD 4 trillion worth of goods annually, through multiple interactions between different parties around the world. Addressing the risks of transfer of invasive pests requires an understanding of the workings and interdependencies of these supply chains to ensure they remain effective and efficient for the conduct of world trade. This is especially true given the traumatic impacts of the recent global public health emergency on national economies.
4. Our collective goal remains to raise awareness of these risks amongst the parties involved in the preparation, packing, handling, storage and transport of containerised goods and to support and encourage preventative action to avoid the movement of goods or containers contaminated by visible pest infestation. To that end we have developed a range of communications in multiple formats and languages.
5. In addition, we are active participants in collaborative efforts partnering with governments in the IPPC's Sea Container Task Force (SCTF) and the North American Sea Container Initiative (NASCI). Our efforts here have been to develop and support programmes to raise awareness of the risk of pest contamination of sea containers and the availability of advice and guidance on its avoidance. These are significant communications challenges that continue to be hindered by the global health emergency.
6. We are opposed to a new global requirement that all freight containers and their cargoes must be certified clean as a condition for ship loading because there is no risk-based evidence to support such a monumental change. The compliance and enforcement costs of such measures would be disproportionate to the benefits obtained from mandatory certification of every container and its cargo. We estimate these additional costs to be in the order of USD 20 billion a year and that this



burden would fall disproportionately on exporting countries. Spreading scarce resources across the totality of the approximately 230 million containers moved internationally each year, not supported by science and proper risk assessments, would be unproductive and not accomplish the desired outcome.

7. Furthermore, a requirement for mandatory certification of container cleanliness would not provide assurance against visible pest contamination as re-infestation could occur at subsequent points in the supply chain. Mandatory controls instituted at one point in the movement of goods would likely breed complacency and a presumption of compliance elsewhere in the supply chain. Constant vigilance on the part of all stakeholders involved should be the desired outcome.
8. Where mandatory measures are evidenced as justified, according to proper risk assessment, they should be limited to movements of specified types of goods between named countries and target specific pest species. The development of any such controls must be undertaken in full consultation with other appropriate bodies, in particular the international agencies responsible for the governance of world trade and for the regulation of different modes of transport, as well as supply chain stakeholders.
9. The partners in the Cargo Integrity Group call upon the international plant protection community to:
 - a. Recognise the commitment and goodwill of the partners in the Cargo Integrity Group to addressing the risks of visible pest contamination of freight containers and their cargoes in international trade;
 - b. Recognise the immense on-costs to governments and industry of implementing, resourcing and enforcing a global requirement that all containers must be inspected and certified clean as a condition for export by ship;
 - c. Recognise the sensitivity of world trade to the disruptive effects of intrusive measures to inspect, certify and communicate the cleanliness of sea containers;
 - d. Focus their efforts and available budgets instead on targeting actions against specific high-risk pests in specific trade lanes where demonstrable threats to natural resources and economic interests are identified and quantifiable;
 - e. Seek further funding to support and sustain a greater awareness of the risks of transfer of invasive species commensurate with the scale of this task; and
 - f. Work co-operatively with industry partners to leverage the impact and effectiveness of the resources and knowledge so far developed in pursuit of these goals.

The partners in the Cargo Integrity Group remain committed to working with national and international agencies in pursuit of the shared goals of improved standards of packing of cargoes in cargo transport units and the avoidance of contamination by invasive pests.



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