



Pesticides prescribed as blanket risk reduction measure in/on containers

- [1] Treating containers with a pesticide (e.g. insecticide) has been explored as a blanket prophylactic risk mitigation measure. While pesticides have a place in eliminating or controlling plant pests in or on cargo, containers and other things, a recommendation or requirement to use them as part of a prescribed program for all containers and cargo would not be feasible for several reasons.
- [2] **Product(s):** If a specific product is prescribed, not all countries (jurisdictions) would be able to use it due to constraints such as availability, pesticide use regulations, and cost. In many countries, pesticides are subject to registration and labelling regulations or requirements. These differ from country to country such that a pesticide that is registered for use in one country may not be registered in another. Furthermore, even if a pesticide is registered in all countries, the labelled uses may be different. Those differences include application rate, application method, what it can be used to control (e.g. specific pests, pest life stage) and use patterns (e.g. In field, crop, commodity, general cargo, warehouse, other spaces, conveyances). There are also concerns with residues – on or in the container, inadvertent absorption by or adsorption to cargo, whether plants, plant products or things that are not plants or plant products. This may lead to issues with Maximum Residue Limits (MRLs) in food or feed cargo. MRLs differ among countries and residues from a product not registered or accepted in a particular commodity is problematic for health and safety reasons and trade implications.
- [3] **Pest(s)/contaminant(s):** Treatment with a pesticide may not have the risk reduction impact that is anticipated if the pesticide is ineffective on the pest or contaminant in or on the container or on the pest life stage that is present at the time of application or during the time the pesticide is still active (e.g. residual products). For example, using an insecticide to treat the containers when the main contaminant is weed seeds or soil or snails will not be effective. Nor will using a product that is only effective on larvae or adults be useful when the contaminating life stage is a pupae or egg mass.
- [4] **Other considerations:** Worker and public health and safety is paramount. Potential impacts of exposure to containers and cargo that have been treated with pesticides must be taken into account. Use of pesticides as a routine measure in a cleanliness program may be subject to scrutiny by occupational health and safety, and environmental safety organizations. There are indeed environmental consideration. The volume of pesticides that would be needed if a blanket requirement for pesticide use was levied (i.e. on every container or even proportion of containers, year-round, world-wide) would be huge. The manufacture, transport and use of that volume of product(s) would exert a large toll on the environment. This would be irresponsible and expensive and unnecessary. There is also risk of developing pest resistance to certain pesticides due to frequent and long-term use of the same active ingredient and chemical groups. This would reduce efficacy of the pesticide(s) against pests in other use patterns (e.g. now have resistant populations of pest X in agriculture, forestry or environmental sectors) and create potentially greater problems if those resistant pests are moved around the world.
- [5] Overall, general prescribed use of a specific product or products as a global solution to reducing pests and contaminants is not practical. However, use of pesticides for specific pests or circumstances could be considered as an additional practice where feasible. This may require bilateral or multilateral agreements.