



Responses to Questions Posed by CPM-15 to the Sea Container Task Force

- [1] From May to December 2021, SCTF participants were encouraged to respond to the questions posed by CPM-15. The results of the initial SCTF discussion of the CPM-15 questions are captured in the minutes of the SCTF meeting on 19 May 2021 and provided in Section A of this Appendix.
- [2] Section B of this Appendix reflects the related considerations that have been discussed during various SCTF meetings and in the development of the final report.
- [3] The final consolidated summary of the responses is found in the relevant sections of the SCTF final report.

Section A: Extract from SCTF May 2021 virtual meeting

1.1. 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?

- [4] 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.
- [5] 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 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.

- [6] 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.
- [7] 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.

[8] 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.

[9] The SCTF concluded:

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

1.2. 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?

[10] 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.

[11] 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.

[12] 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.

[13] 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.

[14] 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.

[15] 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?

[16] The SCTF concluded:

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

1.3. 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?

- [17] 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.
- [18] 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.
- [19] 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.
- [20] 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.
- [21] 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.
- [22] 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 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.
- [23] 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.
- [24] 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.
- [25] 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.
- [26] 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.
- [27] The SCTF concluded:
- (7) Promoting the CTU Code can benefit the work of SCTF.

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

1.4. 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?

[28] 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.

[29] 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.

[30] The SCTF concluded:

- (14) Pathways for sea container contamination should be examined and taken into consideration.

1.5. 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?

[31] 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?

[32] 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.

[33] 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.

[34] The SCTF concluded:

- (15) Apps may be effective in communicating guidance on sea container cleanliness.

1.6. 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?

- [35] One participant said that regulation of pest contamination risk was lax, despite extensive incentives for its management. Only regulatory measures would change behaviours.
- [36] 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.
- [37] 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.
- [38] 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.
- [39] The SCTF concluded:
- (16) Understanding support for regulatory action is important to inform the work of SCTF.

1.7. 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?

- [40] 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.
- [41] 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.
- [42] 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 incentivized to comply because they rely on just-in-time supply chains where delays and detentions have major implications.
- [43] The SCTF concluded:
- (17) Engaging with major retailers is a missing piece of the puzzle.
- (18) An overall systems approach may be the most effective strategy, with some parts voluntary and some parts mandatory.

1.8. 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?

- [44] Although packers are a diverse group that is hard to reach, effective communication with them is likely to have the most impact.
- [45] One possible strategy would be for a container to have phytosanitary inspection at the same time as its safety inspection.
- [46] The SCTF concluded:

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

1.9. 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?

- [47] 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.
- [48] 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.
- [49] The SCTF concluded:
- (20) Compile list of available phytosanitary control measures and assess their strengths and weaknesses.

Section B: Additional responses by individual SCTF members

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?

- Greater awareness raising;
- Outreach material developed and distributed
- Development and publication of IPPC Guidelines on Sea Container Surveys to help regions to undertake sea container inspections and record inspection outcomes in a consistent and measurable manner
- Partnerships developed between government and industry
- Only some regions have provided input. Some regions are not engaged or aware.
- Representatives of the North American Sea Container Initiative, New Zealand, Australia, World Shipping Council, Global Shippers Forum and World Bank Group - both alone or together - have hosted or participated in various webinars (e.g. to Quarantine Regulators Meeting, *Grupo Interamericano de Coordinación en Sanidad Vegetal*) to provide education and receive feedback from other contracting parties and industry as to their successes, obstacles, and constraints in managing the risk from this pathway. Lack of legislative authority and resources for developing and implementing risk mitigation programs for this pathway along with the on-going need for information and technical knowledge to better understand the supply chain logistics and phytosanitary risks were the main points raised during the feedback session of those webinars.
- 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.

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' views and experiences on this?

- Comparative to what? This needs to be defined.
- That this pathway represents a phytosanitary risk is clear. Feedback from contracting party and industry participants at various webinars hosted by some SCTF representatives indicated that pests have been detected in, on containers and/or their cargoes e.g. aircraft wings.

- However, the magnitude remains unclear and there does not seem to be common patterns except with some cargo (e.g. tile and stone, things stored outdoors). Risk increases with exposure to pest conditions and other factors such as travel route, dwell time, packing location and packing time, and season. Previous cargo and conditions can affect container's overall "phytosanitary health".
- Emerging risks such as khapra beetle have illustrate the risks posed by sea containers and the complexities in managing these pest risks. Khapra beetle risks have also demonstrated the difficulties associated with traditional risk management approaches by individual countries at their borders, and emphasized the need for coordinated global solutions to minimize the risks of such pests spreading through international supply chains. The appendices provide detailed information on the khapra beetle issue in Australia as an example of container s as a pathway for movement of pests worldwide.
- A robust assessment of the levels of risk presented by this pathway is considered essential.
- 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.
- 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. More available data on the cost-benefit of phytosanitary control measures may allay industry concerns.
- 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.
- 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. 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.
- 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. Engaging with packers was of paramount importance, despite such challenges. Another important group to engage is large-scale shippers, such as major international retailers.

3. Is the industry using any part of the International Maritime Organization (IMO) container cleanliness code (i.e., IMO/ILO/UNECE Code of Practice for Packing Cargo Transport Units (CTU Code) to improve things? Are there any data on the level of uptake of the CTU Code over the last 5 years? What role does the CTU Code play in addressing NPPOs concerns with preventing the spread of pests? Does this CTU Code have any potential valuable role in the future from a phytosanitary standpoint?

- The CTU code was a logical place to start when SCTF was established as it is a code of practice related to the CTU supply chain that showed promise for strengthening awareness of and consistency in implementation of container cleanliness. Feedback from the engagement conducted by some regions and organizations indicated that there is a low awareness of the CTU code and its application for reducing pest and contaminant risks in the container pathway.
- There is still interest in adding to the cleanliness aspect of the CTU code and related work regarding container inspections is being completed by the IMO.
- Other tools that have been developed by industry include: Joint Industry Guidelines for Cleaning of Containers, the CTU Quick Guide, and a packing checklist.
- Approximately 262/220 million movements of sea containers take place every year, about 60% half of which will be packed with goods.

- The true measure of the degree to which containers are safely packed and protected from pest contamination is not the levels of uptake or awareness of the CTU Code as such, but the number and frequency of container movements that meet its standards.
- 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.
- Updates to the CTU Code could facilitate a contribution by maritime authorities to sea container cleanliness through inspection programmes.

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

- The general term “industry” can be taken to mean all parties involved in the supply chain who use a container along its journey from being dispatched empty till final destination. It includes, packers, exporters, terminal operators, container owners and lessors, container manufacturers, warehouse operators, container operators, shipping lines, shippers, importers, unpackers among others. Parties in non-maritime transportation activities such as trucking companies, railroads and waterways are also important actors. Although there are certain key intervention points for phytosanitary checks and cleaning, everyone plays a role in reducing the risk of moving pests and contaminants around the world.
- The movement of containers and cargo through the global supply chain is complex. It is not a simple point A to Point B movement. A cargo transport unit can pass through multiple countries and travel on multiple modes of transport before it arrives at its final destination. Containers may be reused directly or go through a depot or be repositioned, all combinations are possible.
- There are many parties involved and many “touch points” to consider. Some of the parties are well informed of the importance of container cleanliness but others are less aware and equipped.
- The various parties in the supply chain who are aware of the issue recognize that they have an important role and some industry groups have presented proposals regarding measures for minimizing pest contamination.
- Industry has been very active in creating education and outreach materials that support the IPPC objective of minimizing phytosanitary risk in the container pathways. Good Phytosanitary Practice Program (e.g. Italian tile to U.S.) is an example of an industry-led initiative to ensure cleanliness of cargo and containers to reduce the need for treatment or rejection of shipments at destination.
- A considerable amount of effort and time has been contributed by the representatives of Industry on the Task Force in elaborating the complex nature of international trade and the different ways that sea containers are transported, used, and handled as they pass through global supply chains.
- Shippers, as major drivers of sea container movement, can play a useful role in requiring action on pest control and cleanliness from their suppliers.
- 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. Pathways for sea container contamination should be examined and taken into consideration.

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?

- To determine whether additional guidelines and practices are needed, it is essential to see what is already being done and who have been reached, and what gaps there may be and how best to engage and provide missing info (consider format, etc.). This is something that should be considered for further action within and among contracting parties or by the envisaged Focus

- Group should it be e(they are best placed to find out what the needs are in their countries commensurate with practices, legislation and resources).
- The principal activities in the sea container supply chain where contamination of containers or their cargoes is described in “the IPPC Sea Container Supply Chains and Cleanliness: An IPPC Best practice Guidance on Measures to Minimize Pest Contamination”.
 - The IPPC Guidance document entitled “IPPC Sea Container Supply Chains and Cleanliness: An IPPC Best practice Guidance on Measures to Minimize Pest Contamination” was developed by the SCTF and approved by the IC. These documents identify the key parties involved in the international container supply chain, and describe their roles and responsibilities for minimizing visible pest contamination of sea containers and their cargoes as well as best practices they may follow to meet that objective.
 - The challenge was how to best communicate that guidance to the disparate and multi-language 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?
 - 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. Apps may be effective in communicating guidance on sea container cleanliness.

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?

- There are examples of incentives that are already in place for related activities that could be further explored as tools to reduce the introduction of pests and contaminants in the container pathway. For example, in North America, border services agencies have established Authorized Economic Operator (AEO) programs such as Customs Trade Partnership Against Terrorism (CTPAT) in the United States and Partners in Protection (PIP) in Canada for importers, exporters, carriers and others in their supply chains that enhance border and trade chain security and contribute to *expedited border clearance*. Supply chain participants in those programs must meet minimum security criteria. The CTPAT criteria have an agricultural security component which includes pest and contaminant considerations. Reduced inspection frequency at the border leading to fewer delays and expedited border clearance for pre-approved businesses recognized as low risk is an incentive for supply chain parties to ensure that containers and cargo are clean.
- The container hygiene programs in New Zealand and Australia also provide incentives to industry
- There may be existing or potential industry-led incentives to explore.
- Types of incentives need to be further explored and, that is dependent on contracting party and industry. Could perhaps be something that the envisaged Focus Group to undertake
- Important to find a balance between incentives and regulation, and this would achieve the most effective and efficient outcome.
- Understanding support for regulatory action is important to inform the work of SCTF.

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

- Concern that if don't need to do something, it will not be done;
- How to enforce; what are options: “two strikes”, “three strikes” approach?
- Fraud and other forms of corruption (e.g. saying something has been cleaned when it hasn't), etc.
- The need for continuous outreach and engagement with industry in all countries.

- Reporting/awareness of issues so they can be managed (mitigated, corrected) (I.e. communication and notification mechanisms between and among NPPOs and between NPPOs, border services and industry).
- A successful voluntary approach may rely on industry investing in biosecurity risk management and being able to demonstrate compliant performance to minimize regulatory actions.
- Awareness-raising activities may assist companies to incorporate biosecurity requirements into their existing quality control practices and assist in minimising biosecurity risks. However, providing enough technical and up to date information to help industry identify emerging risks can be challenging. It is also difficult to provide targeted material to the relevant responsible parties within the increasingly complex and differing supply chain networks.
- As there are a number of parties involved in minimizing sea container risks and contamination can occur at various touch points, the success of voluntary options are reliant on contributions from all supply chain stakeholders.
- The difficulty in reaching all parties along the complex network of sea container stakeholders.
- More and better outreach is needed if SCTF outcomes are to be substantive
- 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.
- Effective communication of voluntary measures as a major constraint.
- 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.

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

- It is not clear what “phytosanitary alignment” means.
- Packing and unpacking similar to exporter/importer responsibilities (i.e. exporter responsible for ensuring shipment is pest and soil-free; importer responsible for reporting pests and soil and covering costs to clean-up and ensure that the unpacked container is free from pests).
- Addressing the complexity of contaminating pest risks due to varying biology, global distributions and supply chain management practises requires a comprehensive approach to integrate the measures. While recognizing the complexity of the containerized supply chain and the differing roles and responsibilities an integrated approach would need to involve a suite of integrated pre-border, border and post-border measures that focuses primarily on increasing the management of hitchhiker risk offshore before shipping containers and cargoes arrive in the country of import.
- This approach would ensure that the contaminating pest risk is kept offshore where possible and enable streamlined border movements of cargo for the importing industry.
- Managing risks offshore, where possible enables effective management of specific risks such as mobile pests.
- A possible model would see a phytosanitary inspection happen concurrently to a container’s safety inspection.

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?

- Need to engage the contracting parties to find out.
- There will be a variety of things countries can do, but it will depend on the country. For example, in North America, the NASCI continues to engage industry (parties that use or transport

containers), border services agencies, IMO representatives, invasive species councils, state and provincial governments, other regional organizations (North American Plant Protection Organization, GICSV, Caribbean Plant Health Directors Forum, Quarantine Regulators Meeting), create and distribute outreach materials, respond to reports of pests and contaminants on the conveyance and cargo pathways and ensure that our respective NPPOs train staff to be aware of and deal with phytosanitary threats on the pathways.

10. If we pursue the development of IPPC guidance on sea containers, what would be the most critical and essential elements that need to be addressed?

- Practical, feasible, effective to achieve common outcome with perhaps different ways of getting there.
- who has regulatory authority and who does not
- regulated cargo versus non-regulated cargo;
- resource capacities
- What options for third party delivery may exist; who would monitor or audit third party authorization? This would need to be explored carefully
- Compliance standards, non-compliant actions and who is accountable for non-compliances?
- An IPPC Recommendation on sea container cleanliness should take into account the work of the Task Force and frame its recommendations in the context of the following factors:
 - The roles played by the different parties in the international movement of intermodal freight containers by sea.
 - The complex scope and the scale of the international movement of goods in sea containers, which complexity includes:
 - the different types of goods and commodities moved
 - the number of sea container movements made each year
 - the ways that sea containers are moved between users without returning to a depot
- The nature and types of different forms of pest contamination that may result in the transfer of invasive species between countries and the potential economic and biosecurity impacts that could result.

11. Should hosting an international workshop (or special CPM session) be considered aimed at exchanging regional lessons and experiences gained over these past five years, assessing the industry's role, evaluating the role of the IMO as a potential partner, and identifying the outstanding issues and critical elements?

- The hosting of an international workshop received strong support in the Task Force as an opportunity to explain the group's findings and recommendations; hear and discuss other inputs from sectors and regions not represented on the Task Force; and to promote wider awareness and understanding of the issue of pest contamination of sea containers and the measures already available from IPPC and other sources to mitigate it.
- An outline for an in-person Workshop was developed by the Task Force, which included topics that should be covered, formats for presentation and discussion and practical considerations, such as potential venues.