UPDATE ON THE WORK OF THE CPM FOCUS GROUP ON SEA CONTAINERS AND INTERNATIONAL WORKSHOP ON REDUCING THE INTRODUCTION OF PESTS THROUGH THE SEA CONTAINER PATHWAY

(*Prepared by Secretariat with inputs from Chairperson of Focus Group on Sea containers)*

1. Background
2. At its June 2022 virtual meeting, the CPM Bureau formed the CPM FG on Sea Containers (FGSC) following the decisions of CPM.
3. At the same meeting the CPM Bureau appointed Mr Greg Wolff from Canada (registered replacement Bureau member for North America) as the CPM Bureau representative in the FGSC.
4. The CPM Bureau also noted the IC representative, Mr Dominique Pelletier, and SC representative Mr Hernando Morera GONZÁLEZ (Costa Rica) to the FG. In addition, representatives of IMO, WCO, and WBG were included in the FGSC. (see annex 1 of this paper).
5. According to the TOR[[1]](#footnote-2) the purpose of the FGSC is to review all relevant materials and recommendations, develop viable options that will contribute to phytosanitary risk management, and provide CPM with recommendations, including the option of development of an ISPM.
6. Since its establishment the FGSC has had two virtual meetings.
7. The first meeting was held on 25 August 2022 to elect the Chairperson and, considering the timeframe for the CPM FG, agree on the logistics, identify and prioritize activities. During the meeting it was agreed that members of FGSC will start collecting relevant information to be considered during the revision of CPM Recommendation #6 on Sea Containers (according to the task in the TOR). Additionally, the FGSC created sub-groups to: a). explore the potential value in the use of Authorized Economic Operators (AEO) programmes, and adding data elements to assist in tracking the cleanliness status of container units under the Data Model of the World Customs Organization (WCO); and, b). to work on the proposal to update the CTU Code with elements for prevention of pest contamination that will be submitted to UNECE informal group of experts.
8. Prior to the second meeting of the FGSC was held on 4-5 October 2022 most of CPM FG Sea containers members attended the *International workshop on reducing the introduction of pests through the sea container pathway* (Sea Containers workshop) that was held on 19-20 September 2022 in London, UK, preceding the International Plant Health Conference. The workshop was attended by 130 participants representing NPPOs, RPPOs international organizations and industry stakeholders such as container owners, shipping lines, container manufacturers, freight forwarders, packers, port authorities, marine terminal operators, shippers, importers, exporters.
9. Below is extract from draft report of the sea containers workshop:
10. *“Plant health risks presented by the sea container logistics pathway form one of the largest challenges currently facing the International Plant Protection Convention (IPPC). The performance of the global economy, and all national economies, depend on efficient movement of containers to ensure that supply chains function well. In addition, the number and range of stakeholders involved is also global in scale and extremely diverse, and the pathway itself is a non-agricultural pathway, resulting in important engagement and communications considerations.*
11. *The workshop demonstrated the importance of having open dialogue and involvement of concerned parties discussing that there is an unacceptable level of risk. While there was an agreement and understanding by the participants that there is not enough clarity over the risks presented by sea containers and clearly established level of risk, the conversation, the presentations, and the discussion move towards building on all of the work of SCTF and others have done towards what are the practical solutions that we can look at within an overriding understanding as well that whatever we do, we must be extremely careful not to cause unacceptable damage to the sensitive sea containers logistics pathways.*
12. *If the IPPC cannot develop effective guidance on reducing the plant health risks related to sea containers, and if that guidance is not widely accepted by all major trading partners, the impacts potentially arising from individual countries instead introducing independent import requirement could be immense, including significant impacts on trade and inspection resources.*
13. *It was evident that more progress was made at the two-day workshop than in the previous three years, and this is on no small part due to the physical engagement aspect, as the energy and synergy among participants was palpable, and all opportunities for side meetings, e.g., at breakfast, lunch and in the evenings were exploited. This resulted in clearly evident transparency, trust, cooperation, and innovation, and also afforded several opportunities for prompt, ad hoc analyses of emerging information.*
14. *In general, the broad and significant advancement that emerged during the workshop was the identification of a potential systematic approach that may combine several potential regulatory and non-regulatory approaches. An emerging approach began to develop, based on a series of measures that come together in a systematic way. Similar to the IPPC systems approach when several independent measures that individually cannot be effective but when combine them result in an acceptable risk reduction. Participants discussed about the potential of a systems approach in the case of sea containers. This might be a foundation or basis on which some additional measures can be applied to reduce the level of risk without damaging the logistics and operations.*
15. *Foundational components could include container redesign to eliminate wooden floors (cost implications felt to be neutral and no impact on logistics if introduced as part of normal replacement cycles), coupled with the potential for the use of insect-repellant paint (and/or light-coloured paint to facilitate inspection), and mandatory inspection for contamination when empty containers are circulated through container depos.*
16. *The aspect of container design does continue to stand out to something that can be done relatively easily but still with some questions. It was demonstrated that costs are similar for container redesign, namely removing containers with wooden floors. It is still a question for manufactures if the cost of that construction is similar, and how many years will be needed (replacement schedules are every 17 years) to gradually phasing out containers with wooden floor. But taking into account its minimal impact on logistics, this option can be considered.*
17. *The other examples of work and proposals on container re-design such as underneath the containers, shapes, avoiding the use of specific structures can facilitate the removal of insects and soil adhering to them.*
18. *At the same time, the presentation on the use of insect-repellent type of paint demonstrated that there is still work to be done. The painting of the containers to reduce the risk of contamination does not look feasible in the near future. However, there was some discussion about at least the color of the paint, which can help inspectors identify contamination more easily. Although participants agreed that it would be hard to standardize due to companies’ marketing strategies, this may be proposed as a recommendation. It was also noted that the use of pesticides created complications on all jurisdictions and this cannot be understated.*
19. *These foundational aspects could be accompanied by ad hoc/as required risk-based, targeted inspections and cleaning at containers depos, the use of augmented electronic documentation, and enhanced “custodial responsibility” that would be promulgated through complementary communications. It was agreed that concerned parties should look at solutions where the party taking over the container relies on the previous party having done the cleaning, and if that is not the case, report non-compliance back to that previous party. Therefore, it is important to address how we encourage the application of risk reduction measures, how to hold accountable all concerned parties and overcome resistance from uses, and how to making it normal practice without affecting the sea containers logistics chain.*
20. *Low impact stage on containers logistics like container depots can be used for potential mandatory inspections. However, this can be considered carefully in terms of frequency of entering the depots for each container. While the frequency is still to be clarified and discussed the important point is that when containers go into a container depot they have been taken out of the logistics system and detailed inspection for any contamination can be done at this stage without damaging logistics. This can be potentially a foundational aspect. Container depots in many cases act as the end and start point of a container's movement. Therefore, inspecting empties at container depots may have the least negative impact on container flows and logistics. This should be considered as potential systems approach where the receiving party will hold the previous party responsible for "unclean" containers.*
21. *Emerging technology is also expected to advance rapidly and may form part of a systematic approach and, in this regard examples of a series of cameras fixed to the cranes moving containers from the vessel to the Port Terminal were demonstrated. Cameras at mounted on cranes at ports, coupled with the use of artificial intelligence and machine-learning, that allows all six exterior sides of the containers to be assessed for contamination before it enters port operations. Real-time information from these cameras could be fed into an IPPC database from which other ports could identify if clusters of contamination from one line/origin are emerging and help target inspections more effectively. By the time that containers are ready to move into the port, it can be identified whether they should be pulled away, because there is a concern, or whether they can continue to move, because they demonstrated low risk.*
22. *Importantly, the workshop concluded that empty containers are part of the challenges and do represent risks of pest contamination and there is no overall plant health risk-related difference between empty and packed containers and that there can be recurrence of contamination due to the many points along the supply chain with the understanding that the packing stage is the area where the infestation is most likely to happen. A major concern that has been evident for several years is the immense sensitivity that exists in relation to container logistics and related supply chains, as has been demonstrated through the covid-19 pandemic. Although it appears that some inspection and cleaning can take place in certain points in the logistics systems with minimum impact on logistics, this in itself is not reduce risks of contamination sufficiently.*
23. *Participants also agreed that the problem of pest contamination of sea containers and their cargoes may originate in landlocked countries. The proposal how to address the issue of sea containers contamination should not be limited to the countries hosting sea ports.*
24. *Participants discussed on how to apply incentives, e.g. reduced frequency of inspection. The question arose on whether this all can be in a CPM recommendation, guidance or standard, and these are questions that the CPM FG will be considering.*
25. *Some participants raised a concern that, while the IPPC’s mandate is limited to plant health only, there will also be animal health and food safety concerns and it is important to avoid conflicting or duplicated requirements for NPPOs and industry to implement. This will be raised through the IPPC Secretariat with the OIE and Codex to ensure that any guidance developed by the IPPC will be considered and to coordinate work where appropriate – again, the intent being to minimize negative impacts on logistics.*
26. *Workshop participants communicated a need to organize a follow-up workshop in June/July 2023 to discuss the progress made by the IPPC Focus Group on Sea Containers as a key step towards the IPPC taking key decisions on IPPC guidance in 2024.*
27. *Finally, participants were informed that the CPM FG will discuss the outcomes of the workshop and what type of IPPC guidance can be developed e.g. developing a standard, guidance or revising the relevant CPM recommendation.*
28. *Participants of the workshop were invited to submit their additional ideas and feedback on the workshop discussion to the Secretariat. Several countries provided their feedback (see annex 2 of this paper)”.*
29. Following up from the workshop, the second meeting of CPM FG on Sea containers was held on 4-5 October 2022. The FGSC discussed the information exchanged during the workshop presentations and discussions as well as the conclusions of the workshop. The workshop outcomes will help to identify potential regulatory and non-regulatory options necessary for efficient and effective management of the phytosanitary risks associated with the movement of sea containers.
30. The FGSC noted from the conclusions of the workshop that there is no difference between empty and packed containers in terms of overall phytosanitary risk and that there can be recurrence of contamination due to the many points along the supply chain. (Although it should still be noted that the origin of any contamination is very much influenced by conditions at the point of packing, and that any such contamination can occur more than one packing and unpacking cycle previously.) Therefore, although focusing on points of packing is important, it would not alone achieve necessary risk reduction, i.e., contamination of empty containers is a fundamentally important risk factor.. The FGSC also discussed that information presented at the workshop demonstrated that inspection and cleaning can take place in some locations of sea containers logistic operations, as a regular practice, with minimal impact on timeliness of container movement (e.g. container depots), and that there are a number of voluntary programmes as well as compliance enforcement programmes which reduce inspection rates and delays in the supply chain.
31. FGSC members agreed with the conclusion of the workshop that communication is extremely important. Without making people aware of the issues and how they can contribute to the solutions, it is not possible to achieve the goal. It is essential to continue to raise awareness to broader audiences, including stakeholders that are not involved in trade of plants and plant products. It also became clear that an effective risk mitigation program should be designed in a way that has limited impact on container logistics and be comprised of multiple independent solutions gradually phased-in over multiple years (akin to systems approach principles).
32. The FGSC discussed that the IPPC appears to be leading in this regard and that addressing plant health risks inherent in the sea container pathway may also address other contaminants. Nevertheless, it will be important to work with the OIE and Codex to ensure that the solutions proposed by the FGSC would be considered and accepted for animal health and food safety concerns for a streamlined, predictable and feasible approach to the issue, or at least to coordinate work and avoid any conflicting guidance from emerging. The first step would be for Secretariat-to-Secretariat engagement to ascertain what, if any, related work od proceeding in the OIE and/or Codex. It may then be appropriate to invite an OIE and/or Codex representative to some or all FGSC meetings.
33. The FGSC agreed to discuss the potential for identifying single common points for mandatory inspection (e.g. container depots), as well as the voluntary instruments and quality system approaches that can be applied in order to have full awareness of the issue for further consideration. The draft report of the workshop will be provided to SPG and subsequently posted on IPP workshop [page](https://www.ippc.int/en/core-activities/capacity-development/sea-containers/international-workshop-on-reducing-the-introduction-of-pests-through-the-sea-container-pathway/).
34. Finally, the FGSC agreed with the recommendation of workshop participants to organize a follow-up workshop in June/July 2023 to discuss the progress made by different stockholders and collect additional input to the FGSC proposal on how to reduce the introduction of pests through the sea container pathway to be submitted to CPM-18 (2024). This workshop is seen as an essential step towards preparing recommendations for CPM 18, in order to avoid concerns being raised at a late stage by reviewing proposals with stakeholders. It was proposed not least due to the success experienced at the 2022 workshop.
35. The next meeting of the FGSC will take place on 27-28 October 2022 and will be organized in hybrid mode with physical presence of some members in FAO HQ (German room). The main goal of the meeting to start the revision of CPM Recommendation on Sea containers (R-06).
36. Recommendations to the SPG
37. The SPG is invited to:
38. *note* the update.
39. *note* and comment on the prospective components of the emerging systematic approach identified state 2022 workshop and suggest any additional ideas for inclusion;
40. *note* that the focus group will prepare a draft revision of the existing sea containers recommendation (R-006) and provide any suggestions for aspects that could be considered for inclusion;
41. *note* the concerns raised by several NPPOs about the lack of risk-based date relating to sea containers and arrange where possible to provide any related information that may be available to the focus group;
42. *note* that the IPPC Secretariat will engage with contacts at the OIE and Codex to determine what concerns, plans and/or work may exist in relation to sea containers and animal health and food safety, and that leads from one or both organizations may be invited to observe certain focus group meetings;
43. *note* that intention to hold a second workshop on sea containers in mid-2023 and plan to send participants as appropriate;
44. *consider* the value of planning to establish in 2024 a sea containers implementation focus group, to report to the implementation group, to facilitate implementation of the focus group recommendations that will be presented to the CPM in 2024.

Annex 1: Final composition of CPM FG on Sea Containers

| **N** | **Name** | **NPPO, RPPO, Industry, International Organization** |
| --- | --- | --- |
| 1 | Mr Matias Gonzalez Buttera | Argentina |
| 2 | Ms Wendy Asbil | Canada |
| 3 | Ms Guanghao Gu | China |
| 4 | Mr Martijn Schenk | Netherlands |
| 5 | Ms Sina Waghorn | New Zealand |
| 6 | Mr Fredrick Koome Makathima | Kenya |
| 7 | Ms Shaimaa Ibraheem Badr | Egypt |
| 8 | Mr Rama Karri | PPPO (Australia) |
| 9 | Ms Wendolyn Beltz | NAPPO (United States of America) |
| 10 | Mr Greg Wolff | CPM Bureau representative |
| 11 | Mr Dominique Pelletier | IC representative |
| 12 | Mr Hernando Morera González | SC representative |
| 13 | Mr Lars Kjaer | CCIAG |
| 14 | Mr Uffe Vendelin Ernst-Frederiksen | CCIAG |
| 15 | Ms Taeyeon Kim | WCO |
| 16 | Mr Shane Sela | WBG |
| 17 | Mr Bingbing Song | IMO |

Annex 2: Feedback from sea containers workshop participants

**Sweden:**

1. • When it comes to the issue of sea containers, it is important to create a clearer picture of the risk of sea containers as a way for plant pests to spread and the WS was a valuable step in this direction. A clear science and risk-based justification is a prerequisite for trying to bring about a fruitful discussion about different solutions. The WS presentations from Kenya, Australia and New Zeeland showed examples that plant pests can travel by sea containers. However, we feel that despite the vast number of sea container movements worldwide, evidence of outbreaks of plant pests linked to sea containers (other than those containing regulated products), is lacking.
2. We appreciated the strong representation from the industry at the WS and their willingness to participate in the future development on the sea container subject. We believe that involving representatives from industry is not only desirable but also necessary, not least in order to make use of their expertise around the complex logistics of sea containers. Furthermore, the industry’s perspective is important as we believe that any new initiatives must be both risk proportionate and also feasible for the industry to implement. Initiatives that are too costly and/or cumbersome to implement run the risk of being ignored by stakeholders.
3. Based on the current state of knowledge, we believe that alternatives that are based on further involving the industry are the more promising. For example, the revision of the CTU code. We also look forward to the outcome of the revision of the CPM recommendation on sea containers. We are fully aware that phytosanitary issues and the broader question of biosecurity are intertwined. However, in order to progress we think that the CPM recommendation should be restricted to plant health and should not expand to other areas as the text of the IPPC is strictly about phytosanitary issues. Furthermore, we think it is important that new international measures will not require NPPO’s to inspect and issue phytosanitary certificates for every container movement. Many NPPO’s will simply not have the resources to do this and it would inevitably lead to delays in trade flow with negative implications for the economy.

**Estonia:**

1. The workshop clearly demonstrated that the willingness to find solutions all together exists, even though the solutions may not be easy or readily available.
2. It was said that the sector needs one strong partner to cooperate to find solutions. Since it does not only concern plant health and IPPC (because in addition to plant pests, any living organisms can spread with containers), the next steps would require some input from the environmental and veterinary side as well.
3. Placing the control responsibility on NPPOs is too much, as the subject is broader than just the scope of the IPPC. The main responsibility should fall to the sector through the systems approach.
4. In addition, broad-based awareness raising is needed in the container supply chains, this will be crucial to the success of the risk reduction measures.

**Czech Republic:**

1. It is clear there is not enough survey data on the occurrence of plant pests connected to the sea containers pathway. More scientific evidence is needed to justify any measures taken. For the NPPO of the Czech Republic the scope of possible measures is limited to the plant health only (in line with the scope of the IPPC, excluding biosecurity issues). Any measure that is taken should be proportional to the risk and should be risk targeted. Physical inspections of all sea containers seem to be unfeasible and might be an irrelevant burden for NPPOs that lack capacity to carry out these inspections. Awareness raising is crucial and should start as soon as possible on all levels of the logistic system.
2. It is very important that the industry gave a clear signal that is aware of the risks connected with sea containers and is willing to cooperate. We think that we should take advantage of their willingness and try to find a suitable solution together. Industry self-certification schemes might be a good way forward. The solution might be based on voluntary measures taken by the industry, supplemented by a system of audits. We should keep in mind how complex the sea container logistic is in order to avoid any disruption of international trade. The reasons as well as the measures must be clear to all players involved in the system of sea containers logistic. Container design should also be improved, for example excluding wooden floor. We should also keep in mind that if the IPPC comes with an ISPM that is not feasible for the industry and/or the NPPOs, it could have a negative impact on the IPPC.

**Germany:**

1. In the presentations and the discussion, the following terms were used, partly synonymously but also deliberately differently, to describe the target object (harmful organisms on plants): pests, contaminants, biosecurity risk, phytosanitary risk, invasive species and hitchhiker. With these terms, there is at least an intersection that describes a plant pest organism that falls under the umbrella of the IPPC. However, many organisms that do not fall under the jurisdiction of the IPPC were also addressed. This means that the workshop panellists still do not have a common basis for discussion and understanding. Due to the breadth of the examples discussed, and especially due to the approach called for by some participants to include the entire "biosecurity risk", it seems necessary, in my opinion, as a result of the workshop to contact the organisations representing the other areas outside the IPPC (CBD, OIE and others). This was also made clear at the end of the workshop by the industry statement that they expect one regulation for the economy and not one from each sector. However, in my opinion, the work of the SCFG must be limited to the original IPPC competences.
2. In the course of the discussion on the technical, scientific justification of phytosanitary measures regarding sea containers, data from China, Australia and Kenya in particular were presented. It was unclear to me to what extent these data were representative for the world or related to specific regions, such as tropical countries in the case of the Kenyan presentation. It is therefore important, in my opinion, to produce a better risk assessment for global trade and the phytosanitary risk of sea containers, knowing that the discussion on this has been going on for some years. This may also have implications for the systems approach discussed at the end of the meeting. It is certainly undisputed that due to the biology of some plant pests there is a (theoretical) risk of introduction and/or spread as hitchhikers (e.g. *Lycorma delicatula, Halyomorpha halys, Lymantria* spp. etc.). Nevertheless, in my opinion, there is a lack of hard facts and a conclusive risk assessment that would justify a prescriptive ISPM comparable to ISPM 15. In particular, data on the establishment of plant pests after potential introduction with sea containers have not been presented in the discussion so far. It does not seem trivial to consider the precautionary principle here in an appropriate manner. This risk, which is generally recognised to be increasing due to growing trade, climate change, etc., could be taken into account by general (voluntary) measures by industry in the logistics chain in the sense of the systems approach mentioned above. More specific measures based on concrete risks (e.g. Khapra beetle for Australia) could complement this where necessary, without being mandatory for the whole world. A multi-stage procedure primarily based on voluntary commitments by industry and consistent application of existing "guidelines" (CTU Code etc.) as basic measures, supplemented with specific measures in concrete cases, could provide a good basis for a systems approach.
3. During the workshop, industry acknowledged that there is a phytosanitary risk for sea containers within certain limits, but also called for quantification of that risk. At least the industry representatives represented also signalled that they are willing to do their part to reduce this risk. In addition, quick action was demanded if there is a confirmed risk. However, this was linked to expectations: as little or no influence as possible on sea container logistics as a whole, regulations that are easy to understand and to implement, one regulation for all sectors (plant health, veterinary sector, biodiversity in general) and easily accessible information (e.g. via an app) as opposed to the usual paper form and long documents (e.g. CTU Code with 300 pages including appendices).
4. Some discussion options for the SCFG that I took away from the workshop could be:

* Looking for the point in the container logistics chain that is the most effective treatment option for the container itself. For example, HCS presented that 95% of all containers in Germany go through a container depot - a supposedly ideal approach for general phytosanitary measures. To what extent this is the case in all countries of the world is unclear. However, it does not seem efficient or economical to try to manage the risk of contamination of sea containers with plant pathogens at every point in the logistics chain.
* In addition, core points up to container shipment must certainly be included, where the risk of contamination is greatest. This is essentially the case with loading.
* Another concept discussed was the joint industry task of ensuring that only clean containers are passed on to the next stage of the logistics chain and that the receiving company is responsible for ensuring that this is the case. This could be done under industry ownership.
* The above point should also be seen in the context that in my estimation, based also on the discussion at the workshop, most NPPOs of the IPPC contracting states do not have the personnel capacities to carry out phytosanitary inspections of sea containers - no matter at which point in the logistics chain.
* According to the industry, the CTU Code is obviously not currently taken into account by all companies involved in the container business, also because there are other standards (e.g. International Convention for Save Containers). In order to achieve widespread application of the CTU Code, an "awareness campaign" is necessary in addition to the updating discussed.
* In the course of the discussion on the CTU Code, the need for revision in relation to plant health also became clear, as did more modern ways of providing the information, which must then be available in the respective national language (keyword: mobile phone-based app).
* Different options for new designs of containers were presented, whereby from my point of view mechanical/technical/structural solutions are to be preferred, including the colour of the containers or the paint finish (keyword: lotus effect). In my opinion, the comparison of phytosanitary treatments such as fumigation with ISPM 15 is misleading. With ISPM 15, as long as no changes are made to the wooden packaging, only one phytosanitary treatment is carried out, which is valid for the service life of the packaging. And even for this, the IPPC was heavily criticised in the early 2000s for using MBr in the case of fumigation. Currently, there is an initiative in a large number of IPPC contracting parties worldwide to reduce the use of chemically synthetic pesticides. Regular fumigation of containers in circulation, or even regular application of insecticidal paint, runs counter to these initiatives and should be weighed up very carefully in the discussion with regard to risks and benefits, also in relation to the public image of the IPPC.

**The Netherlands**

1. The presentations showed that together we have already learned and achieved a lot, but also that additional steps are needed. Such steps must take into account both the complexity of the container logistics and the potential impact of any changes to the logistic process. With this comes the responsibility to take proportional steps. I  welcome the opportunity to send in some remarks.
2. First of all, I must say that I was impressed by the amount of information shared by the industry stakeholders and their willingness to take action. I understand the conditions that come with this willingness. I believe the two most important ones are:

* Minimal impact on sea container logistics, and
* Measures taken by the industry should be sufficient for all fields of interest (Plant Health, veterinary and food security).

1. For the second point, I think coordination is needed between the IPPC and its sister organizations like the OIA, Codex and the CBD (?). I’m not sure whether this falls within the mandate of the Focus Group, but I would suggest that the secretariat of the IPPC contacts these organizations to explore the possibility for harmonized actions.
2. Another valuable outcome of the workshop is that the we seem to have a common understanding that the part of the CTU code on plant pests needs to be improved, while the uptake of the CTU code could be improved as well. The improvement of the CTU code cannot be done without involving the IPPC in the process to ensure that the code contributes effectively to minimizing the risk of spreading plant pests.
3. I was very impressed with the studies undertaken by various countries on e.g. the presence of insects and other contaminants. Such studies should be encouraged so that we may have a more complete overview of the potential risks posed by the sea container pathway. These studies should be encouraged to take into account the probability of transfer and explore whether the environmental requirements needed for establishment of a pest are met. However, studies that quantify insects in at a general level do provide a good indication of the cleanliness of a container, but do not allow for conclusion on whether er the identified specimens are indeed plant pests and whether these constitute an actual risk. Hence, the Australian study on Khapra Beetle may serve as a good example for a targeted and pest-based approach.
4. For the NPPO of the Netherlands, it is essential that the scope of the activities of the focus group remains limited to Plant Health. This does not mean that our inspections can only take place on plants and plant products. So called inanimate products or vehicles may also fall under the supervision, but we can only take measures on Plant Health issues. The scope of the IPPC is limited in the same way and I am thus of the opinion that IPPC recommendation and other IPPC documents should remain within the scope of the Convention (Plant Health). That makes it even more necessary to get other organizations involved if we want to honor the conditions set out by industry during the workshop.
5. I am also of the opinion that any recommendations, proposed measures or other action should be proportional to the risk and that measures should be risk- and science based.
6. The third important aspect that I would like to emphasize is the condition that any possible future international measures should not overburden the NPPOs. A situation where every international movement of containers is to be accompanied by a guarantee of an NPPO (e.g. a phytosanitary certificate based on an inspection) should be avoided at all cost. Not only is this unfeasible for the vast majority of NPPOs, but this would also cripple container logistics with potentially devastating effects on trade and economy.

*What is possible?*

1. I can imagine a future system that has the characteristics of a systems approach with several elements in two layers:

*I Baseline actions*

1. Voluntary actions taken by the industry (the basic requirements of which will have to be agreed upon in dialogue with the international organizations mentioned above). The responsible actors are the container owners, the shipping lines and the container depots. NPPOs have no, or only a very small role in the supervision of these measures.
2. The actions in this section include (but are not limited to):

* Container design (the first action could be an incentive to gradually replace containers with wooden floors by containers with steel or composite floors). This is a long term action.
* Cleaning of containers at a convenient point in the logistical flow of sea containers, like the container depots. How containers should be cleaned to reduce the risk (= the chance that a pest is still present and viable after cleaning) to an acceptable level, should be further investigated. The different actors along the logistics chain must take responsibility to ensure that once a container has been cleaned (inside and outside), this status is maintained throughout the entire process.

1. These baseline actions should improve the (veterinary, phytosanitary, biodiversity human) health status of containers. However, such actions may not address all the risks deemed important.

*II Targeted measures*

1. Specific risks that remain after the baseline actions might be addressed by targeted measures aimed towards specific pests. These measures should normally be the responsibility of the shippers (importers, exporters or their agents) and may take place under supervision of an NPPO. Targeted measures must be risk- and science based and could target sea containers coming from a certain region or country or containers that have carried certain commodities (since their last cleaning) and thus pose a risk of carrying a specific pest. For some of these measures more data on containers, where they have been and what they have carried might be needed. It goes without saying that the baseline measures must be designed in such a way that specific measures can be kept to a minimum.
2. Targeted measures may include:

* Cleaning or disinfection after having carried certain goods from certain countries
* Cleaning before carrying certain goods to certain destinations
* Monitoring upon import or prior to export of containers with certain characteristics.

1. Some of these baseline actions and targeted measures may take a long time to implement because the required tools are not available (data) or because they take a long time to realize (if today industry would start with gradual replacing containers with wooden floors for containers with steel floors, this would not be completed before 2039). The question remains what can be done on the short and medium term.
2. Awareness raising and steering towards a better uptake of the (to be improved) CTU code are important and can be initiated relatively fast. Another short term activity is the adaptation of the CPM recommendation on sea containers. In my opinion, the updated recommendation should stay within the scope of the IPPC, thus focusing on plant pests only.

**Denmark:**

1. During the workshop, many examples of pest risks related to the sea container pathway were presented. This shows that limiting the scope corresponding to the scope of the Convention is necessary; that is, the IPPC cannot take responsibility within other areas of expertise (e.g., biosecurity)..
2. Presentations addressed the need for collecting data on sea container transport to serve as a basis for the approach applied and a baseline to allow evaluation of the progress made. Data would allow for evaluating the actual risk presented, as well as aligning the measure proportionaily. To achieve this, region wide research projects should be initiated. Both the type of products transported as cargo, the geographical locations and their port facilities visited, affect the inherent risk. Presentations by Kenya, Australia, New Zealand and Canada and the US show the importance of data collection to employ a risk-based approach, supported by scientific data, to avoid unnecessary burdens.
3. After the workshop, it is obvious to all participants that the logistics of transport via sea containers is complex and time sensitive. Initiating strict measures would be both burdensome and damaging to international trade. To initiate a measure not manageable or effective could also reflect negatively on the integrity of the IPPC as standard setting body.
4. One of the reasons for arranging the workshop is that different RPPOs and NPPOs face different challenges. Possibly, the cumulative effect of more voluntary industry measures would be the best way to minimize pest spread via sea containers, since not one single measure will be able to achieve this on a global scale. The Sea Containers Task Force developed and collected a variety of material during their work on the subject, including an IPPC Recommendation, as well as guideline on the subject. Updating these, to include new knowledge would serve as valuable guidance.
5. Measures must be effective and practicable; otherwise, they will not be implemented, leaving us with status quo and words on a piece of paper. Therefore, cooperation with industry stakeholders must be a part of the solution. The CTU Code, the industry’s code of conduct, including guidance on sea container cleanliness, will expectedly be revised in 2023. Tt is necessary that the IPPC be involved in this work. We heard at the workshop, that it is important to make sure, that the revised CTU Code is fit for purpose, also in respect of minimizing pest spread. To improve the uptake and usability of the document, updating the short version of the guide or making a two-pager with key messages could prove advantageous. To raise awareness would also highlight the responsibility of each of the stakeholders in the trade and transport chain, outlined in the model of the Verified Pest Prevention proposal included in the report of the Sea Containers Task Force. Likewise , we welcome building on the voluntary programmes run by specific industry sectors, illustrated by the presentation from the Italian tile industry exporting to the US. This allows industry to brand themselves on the results achieved from following the programme, thus proving its worth, creating motivation and commitment.
6. Lastly, we found it very interesting and promising to hear about ideas on sea container design and coating. We should follow and incorporate new technologies within this field.
7. Based on these observations, Denmark favours:

* Limiting the scope of the subject to plant health, the scope of the IPPC.
* Measures that are risk and science based, supported by data, aligned with the actual risk. Preferably, baseline data should be followed up by measuring progress.
* IPPC recommendation/guidance in cooperation with industry measures to secure co-ownership and motivation, including building on new technology for sea container design

**British Coffee Association (Cleiton Papke):**

1. I would like to reiterate our support to the initiative to improve awareness to reduce the movement of pest in containers, working closely with our counterparts in the Coffee and Logistics Industries, reinforcing measures already in place and developing new best practices guidelines for loading and unloading containers.
2. Our takings and recommendations for the IPPC, SCTF and the new Focus Group.
3. Dissemination of awareness of pest movement on sea containers is essential and will be the most effective way to achieve sustainable results reducing the movement of pests.
4. Working with the industry creating best practices guidelines and educative materials on how to inspect sea containers and safely load and unload the cargo preventing hitchhiker pests.
5. Creation of a simple way to report non-conformances in order to detect trends, creating alerts for the interested parties, including the industry members in order to take extra care where applicable. (e.g. ePing alert from the WTOhttps://epingalert.org/ )
6. Work closer with the Cargo Integrity Group, the IMO, the UNECE and the ILO to improve the CTU and Quick Guides as well as free educative material.

1. <https://assets.ippc.int/static/media/files/publication/en/2022/07/CPM_ToR_FG_SeaContainers.pdf> [↑](#footnote-ref-2)