



**COMMISSION ON PHYTOSANITARY MEASURES
SEVENTEENTH SESSION**

**UPDATE FROM THE CPM FOCUS GROUP ON SEA CONTAINERS AND THE SEA
CONTAINERS WORKSHOP**

AGENDA ITEM 13.2

(Prepared by Chairperson of Focus Group on Sea containers)

Background

- [1] At its June 2022 virtual meeting, the CPM Bureau formed the CPM FG on Sea Containers (FGSC) following the decisions of CPM.
- [2] 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.
- [3] 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 (membership provided in annex 1).
- [4] According to the TOR¹ 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 the CPM with recommendations, including the option of development of an ISPM; in addition the FGSC was charged with preparing a draft revision of the existing CPM Recommendation No. 6.
- [5] The FGSC met several times during 2022, twice virtually and in once in-person. The draft report of the workshop will be posted on IPP focus group [page](#).
- [6] The first meeting was held on 25 August, 2022, to elect a standing Chairperson, agree on logistics of meetings, and identify and prioritize activities. 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.
- [7] Subsequent to the IPPC Sea Containers Workshop held in September 2022 in London, UK, the second meeting of CPM FG on Sea containers was held on 4-5 October. Most FGSC members had attended the workshop. 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.
- [8] 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 also a fundamentally important risk factor. The FGSC also discussed that information presented at the workshop demonstrated that inspection and cleaning can take

¹ https://assets.ippc.int/static/media/files/publication/en/2022/07/CPM_ToR_FG_SeaContainers.pdf

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.

- [9] As noted during the workshop, effective communication is extremely important to achieving risk reduction for the sea container pathway. Without making all involved aware of the issues and how they can contribute to the solutions, it is not possible to achieve the goals of risk reduction. 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 must be designed in a way that minimizes any negative impacts on container logistics and be comprised of multiple independent solutions (akin to systems approach principles).
- [10] The FGSC discussed that, although the IPPC is responsible for management of plant health risks for sea containers, it is evident that addressing plant health risks inherent in the sea container pathway may also address other contaminants. Therefore it will be important to engage with the World Organization for Animal Health (WOAH) to ensure that any solutions proposed by the FGSC would be considered and accepted for animal health concerns for a streamlined, predictable and feasible approach to the issue, or at least to coordinate work and avoid any conflicting guidance from emerging². The first step would be for Secretariat-to-Secretariat engagement to ascertain what, if any, related work is proceeding in the WOA. It may then be appropriate to invite a WOA representative to some or all FGSC meetings.
- [11] The FGSC agreed on the importance of attempting to identify common points for potential mandatory inspection with the lowest expected impacts on logistics (e.g. container depots because when there, containers are out of immediate usage logistics cycles), 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.
- [12] 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 stakeholders 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. In addition, the workshop will be an important component of consultations on the draft revision to Recommendation No. 6, should CPM approve it for consultation. The workshop was proposed in large part due to the successes and advancements experienced at the 2022 workshop.
- [13] The third meeting of the FGSC took place on 27-28 October, 2022, in Rome, with participation of some members online. The main goal of the meeting was to start the revision of CPM Recommendation on Sea containers (R-06). To be presented under agenda item 11.

² It is understood that Codex has already provided guidance related to chemical residues and cleanliness relating to food shipped in sea containers.

International workshop on reducing the introduction of pests through the sea container pathway (Sea Containers workshop)

- [14] The workshop 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.
- [15] The workshop demonstrated the importance of having open dialogue and involvement of a variety of stakeholders discussing how to address the present levels 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.
- [16] 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 and potentially conflicting import requirements could be immense, including significant impacts on trade and inspection resources.
- [17] 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 several opportunities for side meetings on the margins of the workshop 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.
- [18] 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 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.
- [19] 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-repellent paint (and/or light-coloured paint to facilitate inspection), and mandatory inspection for contamination when empty containers are circulated through container depots.
- [20] These foundational aspects could be accompanied by ad hoc/as required risk-based, targeted inspections and cleaning at containers depots, 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 users, and how to making it normal practice without affecting the sea containers logistics chain.
- [21] Points in container operations with the lowest expected impacts on logistics, such as container depots could potentially be used for mandatory inspections. However, this must be considered carefully in terms of frequency of appearance in 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 when it is empty and includes a period for structural inspection. Therefore, inspecting empties at container depots may have the least negative impact on container flows and logistics. This should be considered as part of a potential systematic approach under which the receiving party will hold the previous party responsible for ensuring that containers are clean.

- [22] 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. This is based on 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, even in other countries, 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.
- [23] Importantly, the workshop concluded that empty containers form an important part of the challenges, representing risks of pest contamination, and that 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.
- [24] A major, well known concern that was reconfirmed at the workshop is the immense sensitivity that exists in relation to container logistics and related supply chains, as has been demonstrated very clearly through the covid-19 pandemic. Although it appears that some inspection and cleaning can take place in certain low-impact points in the logistics systems with minimum impact on logistics, this in itself does not appear to have the potential to reduce risks of contamination sufficiently.
- [25] Participants also agreed that the problem of pest contamination of sea containers and their cargoes may originate in and/or present risks to landlocked countries. The proposal how to address the issue of sea containers contamination should not be limited to the countries hosting sea ports.
- [26] Workshop participants communicated a need to organize a follow-up workshop in 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. This workshop is being arranged to take place in Brisbane, Australia, 17-21 July, 2023.
- [27] Participants at the workshop were invited to submit their additional ideas and feedback on the workshop discussion to the Secretariat. Several countries provided their feedback (provided on the workshop web page).
- [28] The draft report of the workshop will be posted on IPP workshop [page](#).

Recommendations to the CPM

[29] The CPM is invited to:

- (1) *note* the update.
- (2) *note* and comment on the prospective components of the emerging systematic approach identified as part of the 2022 workshop and suggest any additional ideas for consideration;
- (3) *note* the [concerns raised by several NPPOs](#) about the lack of risk-based data relating to sea containers and arrange where possible to provide any related information that may be available to the focus group;
- (4) *note* that the IPPC Secretariat will engage with contacts at the WOAHA to determine what concerns, plans and/or work may exist in their organization in relation to sea containers and animal health, and that leads from WOAHA may be invited to observe certain focus group meetings;
- (5) *note* the arrangements being made to hold a second workshop on sea containers in Australia mid-2023 and plan to send participants as appropriate;.

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