

Report to CPM-19

Submitted by World Shipping Council and Global Shippers Forum

Introduction

The World Shipping Council (WSC) and the Global Shippers Forum (GSF) are honored to participate in the work of the Sea Containers Focus Group (SCFG).

We are actively involved in the full spectrum of activities of the SCFG. As the global representative bodies of container shipping lines and of cargo owners respectively, we are in a position to communicate to, and engage with, the parties in the international containerized supply chains on the efforts by the CPM to minimize pest contamination in the container pathway, including the development of long-term measures to meet that objective. By the same token, we also are able to communicate to the SCFG, and by extension, the wider IPPC community about our efforts to raise awareness among our member and others regarding the need to minimize pest contamination of containers and their cargoes. As members of the Focus Group we are able to offer views on the possible implications on the international containerized supply chains of measures being proposed or considered.

We take these responsibilities seriously. We believe that active and constructive engagement with the SCFG and the IPPC will assist the organization in devising meaningful long-term measures while at the same time preserving the fluidity, efficiency and cost effectiveness of international containerized trade.

We set out below some of the activities we are actively engaged in. These are but a few such activities and we would welcome the opportunity to provide further updates during the CPM-19 session.

IMO/ILO/UNECE Code of Practice for Packing of Cargo Transport Units (CTU Code)

The CTU Code is a non-mandatory code of practice for the handling, packing and transport of cargo transport units (CTUs), including freight containers, in sea and land transport. It is jointly sponsored by the IMO, ILO and UNECE, and was developed by an expert group with active industry involvement. It provides guidance on all aspects of packing, securing and transport of cargo in containers and other CTUs, and as such addresses a plethora of issues of importance to packers, shippers, freight forwarders and shipping companies, amongst others.

There is no systematic empirical data on the uptake of the CTU Code by parties in the CTU supply chains. However, industry associations working together in the Cargo Integrity Group, including WSC and GSF, are undertaking significant efforts to raise awareness and usage of the Code, including by the issuance of a Quick Guide to the CTU Code as well as a Container

Check List (published in each of the official UN languages) to assist in the safe handling of containers and their cargoes, including measures to minimize pest contamination.

The CTU Code should be considered the authoritative global source of information for the handling, packing and transport of CTUs. It is available for free on the UNECE and IMO websites¹.

- *The CTU Code and pest contamination*

The current version of the CTU Code was published in 2014 and contains information about pest contamination of CTUs and examples of such contamination. The inclusion of pest contamination information in best practices guidelines for the intermodal industry was at the time a novel and welcome development that merits applause.

However, various NPPOs and RPPOs, as well as the IPPC's Sea Container Task Force, expressed some concerns about the pest contamination content in the current version of the CTU Code. These concerns are shared by the SCFG, which established a sub-group to develop more comprehensive pest-related information for inclusion in a revised edition of the CTU Code that is presently being developed.

A revised version of the CTU Code is poised to be officially approved by the UNECE in February 2025 with subsequent approval by the two other sponsoring UN organizations (IMO and ILO) expected during 2025-26.

- *New pest contamination provisions in the revised CTU Code*

The SCFG's sub-group on the CTU Code with the active participation by WSC and GSF was successful in obtaining agreement by a joint meeting of two UNECE committees on 16 and 17 December 2024, on its proposed amendments to the Code, with only minor editorial and stylistic changes. The new pest contamination provisions include but are not limited to:

- Usage of a definition of "pest contamination" that is identical to that included in the CPM Recommendation 06
- Insertion of a definition of "visible [pest contamination]" that is similar to the one used in IPPC publications and in the IMO's revised CTU inspection guidelines
- Inclusion of a new, dedicated chapter on pest contamination and the importance of implementing measures by parties in the containerized supply chains to minimize it. This new chapter to a large degree builds on, and reflects, the content in CPM Recommendation 06

¹ UNECE: <https://unece.org/transport/intermodal-transport/imoilounece-code-practice-packing-cargo-transport-units-ctu-code> and IMO: <https://www.imo.org/en/OurWork/Safety/Pages/CTU-Code.aspx>

- The new chapter stresses that minimizing pest contamination of containers and their cargoes is a shared responsibility that should be undertaken in conformance with the “custodial responsibility” approach
- Inclusion of pest-specific measures and responsibilities for the core parties in the containerized supply chains, namely, shippers, packers, freight forwarders, terminals and shipping companies, in the all-important chapter in the (revised) CTU Code defining roles and responsibilities of the parties
- Replacing current Annex 6 in the CTU Code with the “placemat” in CPM Recommendation 06. This also includes references to methods for the disposal of pest contamination.

The agreed changes and amendments for inclusion in the revised CTU Code provide actionable guidance to parties in the containerized supply chains on reducing risks of pest contamination. As such, they demonstrate and confirm the value and significance of awareness and education that are integral elements and objectives of CPM Recommendation 06 and the ongoing work of the IPPC’s SCFG.

Custodial Responsibility

‘Custodial Responsibility’ is a concept initially developed by WSC and GSF. It describes a series of non-regulatory commitments made by each commercial party involved in the international carriage by sea and associated land transport of goods in containers and which takes custody of the container at some point in its journey.

The responsibility placed on each custodian of the container is to take reasonable steps to ensure that the container, and any cargo it contains, are received from the previous party free of any visible pest contamination, and that reasonable efforts are made to prevent such contamination from occurring whilst the container and/or cargo is in that party’s custody. Responsibility for reducing the risk of contamination is therefore shared between all parties to a containerized shipment.

To do this, the Custodial Responsibility arrangements identify a series of checkpoints during the journey of a container shipment where the party having custody of the container undertakes to check that where access is safe and practicable, its external and interior surfaces, and any cargo it contains, are free of visible pest contamination.

These checkpoints occur at the following points in the journey of a containerized shipment:

1. Upon dispatch of an empty container to a shipper or packer from a container depot by the depot operator on behalf of the container operator.
2. Upon collection of an empty container by the transport operator delivering the container to the location where it is to be packed.
3. Upon receipt of an empty container at the packing location by the shipper or their designated packing (or container stuffing) contractor.
4. Upon completion of packing of cargo in the container and closure and sealing of the doors by the shipper or packer, but prior to dispatch.
5. Upon collection of the packed container at a packing location by the transport operator delivering it to a port terminal or other designated location.
6. Upon receipt of the packed container at a port terminal or other container handling location by the operator of that terminal.
7. Upon loading of a container aboard a ship by the port terminal operator.
8. During a sea voyage by the operator of the ship carrying the container.
9. Upon unloading from the ship at the destination port by the port terminal operator.
10. Upon collection of the container by the transport operator delivering the container to the location where it is to be unpacked.
11. Upon receipt of the container at the packing location by the consignee or their designated unpacking (or destuffing) contractor.
12. Upon opening of the container by the consignee or unpacker.
13. Upon completion of unpacking and emptying of the container and closure of the doors by the consignee or unpacker.

14. Upon collection of the emptied and, if necessary cleaned, container by the transport operator delivering the empty container to the container terminal or depot where it is to be stored awaiting further use.

At each checkpoint, the party undertaking the check is expected to hold the previous custodian of the container to account if pest contamination is found, and also to take the necessary measures to contain, remove or otherwise manage the contamination using recommended practices, following consultation with local plant protection offices, where appropriate.

The level of overall accountability for the cleanliness of containers and their cargoes under Custodial Responsibility is therefore driven by the desire of each party to avoid the significant costs and delays involved in cleaning a contaminated container, and the spoiling or devaluing of cargoes.

To be effective these self-reinforcing actions will need to be instituted into the operational practices and procedures of each of the commercial parties involved and this remains a significant task for the industry and its representative bodies, once the operational details of Custodial responsibility have been agreed and adopted. An extensive outreach programme on the custodial responsibility concept is being undertaken by WSC and GSF. The SCFG can make a major contribution to supporting this programme through the development of explanatory aids and guidance materials, on container checking, signs of contamination and recommended means for its removal and disposal.

Pest resistant containers

The IPPC Secretariat, in collaboration with WSC, the Container Owners Association (COA) and the Bureau International des Containers (BIC) organized in November 2024 in Rotterdam, Netherlands (Kingdom of the) an “International Symposium: Optimizing Container Design to Mitigate Risks of Pest Contamination in the International Containerized Supply Chain”. GSF participated in the Symposium which had two primary objectives:

- to develop actionable strategies for achieving the specific recommendations identified in CPM Recommendation 06², i.e. the recommendation related to cracks, gaps and crevices; the recommendation to use light-colored coatings for undercarriages; and the

² <https://www.ippc.int/en/publications/84233/>

recommendation to cease the use of bitumastic undercarriage coatings in new production.

- to collectively consider and formulate other actionable design proposals, such as improvements to the design of the undercarriage and of vents, which can contribute to further risk reduction.

The program for, and presentations made at the Rotterdam Symposium, is available at the IPPC website³.

Close to 70 representatives from NPPOs, container operators (shipping lines), container lessors and container manufacturers collectively and constructively considered practical modifications to container designs. These included:

- Floor designs that eliminate gaps and cracks and that prevent nail holes
- Understructures with fewer horizontal ledge configurations and/or change in the shape of profiles to a corrugated base
- Elimination of bitumastic undercoatings.

There was collective agreement to move forward with these options. Specifically, they are being considered by a dedicated working group that in due course will make its recommendations available to the SCFG.

These recommendations are likely to be discussed – together with other elements in CPM Recommendation 06 - at a “Symposium on Container Cleanliness” that - hopefully with the support of the IPPC Secretariat - is being jointly organized by the NPPO of Denmark, BIC and WSC. The symposium will take place on 7-8 October 2025 in Copenhagen, Denmark, together with a back-to-back physical meeting of the SCFG. Both events are intended to further progress the development of actionable recommendations for long-term measures for consideration at CPM-21.

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³ <https://www.ippc.int/en/core-activities/capacity-development/sea-containers/international-symposium-optimizing-container-design-to-mitigate-risks-of-pest-contamination-in-the-international-containerized-supply-chain/>