



Update from the CPM Focus Group on Sea Containers

COMMISSION ON PHYTOSANITARY MEASURES

TWENTIETH SESSION

UPDATE FROM THE CPM FOCUS GROUP ON SEA CONTAINERS

AGENDA ITEM 14.2

(Prepared by the Focus Group and the IPPC Secretariat)

1. Introduction

[1] The Commission on Phytosanitary Measures (CPM) established the CPM Focus Group on Sea Containers with terms of reference to review relevant materials and recommendations, develop viable options that would contribute to risk management, and provide the CPM with recommendations, including considerations around the option of the development of an ISPM.

[2] CPM-18 (2024) noted the work undertaken by the focus group, adopted the revised CPM recommendation on *Minimizing the pest risk associated with the sea-container pathway* (R-06) and agreed to extend and adjust the focus group's terms of reference until CPM-21 (2027).^{1,2} By that year, the focus group is expected to provide CPM-21 with final recommendations on long-term IPPC guidance for managing the pest risk associated with the sea-container pathway.

[3] In order to address the items outlined in the terms of reference, the focus group developed an action plan, which was approved by the CPM Bureau in October 2024. The action plan is updated regularly by the focus group.

2. Update from the CPM Focus Group on Sea Containers

2.1 Outcomes of the October 2025 Symposium on plant and biodiversity protection – Mitigating risks of pest contamination in the international containerized supply chain

[4] The symposium was held from 7 to 8 October 2025 in Copenhagen, Denmark, and it was organized by the Bureau International des Containers, the World Shipping Council and Danish Shipping, with the support of the IPPC Secretariat and the Danish national plant protection organization (NPPO).³

[5] The symposium focused on:

- understanding the pest risks to plant health and biodiversity associated with the sea-container pathway;
- understanding the role and impact of sea-container design modifications to minimize pest contamination;

¹ CPM recommendation on *Minimizing the pest risk associated with the sea-container pathway* (R-06): <https://www.ippc.int/en/publications/84233/>

² Terms of Reference for the CPM Focus Group on Sea Containers (2024): <https://www.ippc.int/en/publications/93484/>

³ Symposium dedicated web page: <https://www.ippc.int/en/core-activities/capacity-development/sea-containers/working-together-clean-containers-and-safe-trade-symposium-on-plant-and-biodiversity-protection-mitigating-risks-of-pest-contamination-in-the-international-containerized-supply-chain/>

- identifying possible solutions; and
- outreach and available resources.

[6] The aim of this symposium was to provide an opportunity to raise further awareness of the work of the focus group and the pest risks associated with the sea-container pathway and was intended to attract representatives from major carriers, leasing companies, container manufacturers, biosecurity experts, plant-health stakeholders, and NPPO representatives. This would have allowed the focus group to gain insights from a stakeholder perspective in relation to the practicalities of CPM Recommendation R-06 and to identify regulatory and non-regulatory options.

[7] However, attendance at the symposium was very low and the representation of several crucial stakeholders was lacking despite intensive lobbying and advertising on various industry fora. Feedback from European NPPOs in attendance was valuable but not in itself sufficient to justify the cost and effort of holding the symposium.

[8] The focus group will further investigate and propose the development of an e-learning course on container inspections, pest detection and management, stemming from an industry suggestion at the symposium.

2.2 Framework of regulatory and non-regulatory measures

[9] The focus group continued its tasks, as outlined in its terms of reference, to analyse potential regulatory and non-regulatory options in order to identify and describe a recommended option or options to minimize pest risks in the sea-container pathway.

[10] The focus group, through the work of its Regulatory and Non-Regulatory Measures (RNR) Working Group, has evaluated regulatory and non-regulatory measures using an assessment tool and has identified several measures to pursue further in the context of a potential framework of measures. The progress report of the working group can be found on the IPP.⁴

[11] The regulatory and non-regulatory measures considered for evaluation were those that had been raised or proposed by NPPOs and industry stakeholders and through various fora such as workshops and symposia. The measures considered were described and then evaluated using an assessment template based on the essential criteria (practical, feasible, economical, concrete measures that could be globally adopted).

[12] The assessment tool specifically took into account the impact on industry, economics, contracting parties and other agencies, implications on time, cost and quality of trade, legislative authorities, specific risks to be managed, assurance measures, regulatory resources and the state of readiness (is the measure proven or conceptual).

[13] Through the work of the RNR group, measures selected by the focus group to be further pursued are education, awareness and outreach, custodial responsibility, container design, the Code of Practice for Packing of Cargo Transport Units (CTU Code), and third-party authorization or recognition. Many of these are already mentioned in CPM Recommendation R-06. Most of the measures are non-regulatory measures, but third-party authorization or recognition could also have a regulatory application.

[14] In 2026, the RNR group will also evaluate the benefits of a supporting ISPM as a potential long-term solution. To this end, the RNR group has already initiated a discussion on the potential elements included in an ISPM to allow for a more focused discussion.

[15] The focus group will continue to elaborate the selected measures, their implications, how to fit them into a framework, concrete operationalization aspects and timeframes. The draft framework is expected

⁴ December 2025 report of the CPM Focus Group on Sea Containers' Regulatory and Non-Regulatory Working Group: <https://www.ippc.int/en/publications/95340/>

to be presented at a CPM-20 (2026) side-session and will contribute to the final recommendation to CPM-21 in 2027.

2.2.1 Container design

[16] The November 2024 international symposium in Rotterdam identified widespread support within industry to progress improvements to container components to minimize the risk of pest contamination.

[17] An industry working group has subsequently been formed and is further exploring design changes to items identified as a priority at the symposium. These include, but are not limited to:

- floor designs that do not have gaps and eliminate cracks and nail holes (steel floors are the preferred option, but some resistance to this change still needs to be overcome as there are downsides in terms of tare weight and costs of manufacture);
- base frame structures with fewer horizontal ledge configurations or, preferably, a change in design to that of a corrugated base, similar to reefer containers); and
- elimination of bitumastic undercoatings.

[18] There is collective agreement within the industry working group to move forward with these options while continuing to explore other design changes that may prevent the carriage of pests. The industry working group has agreed to move forward on developing an International Organization for Standardization (ISO) standard for a “pest free” container design, with the aim of ensuring continued future compliance.

[19] Additionally, a major container manufacturer in China has implemented and is trialling a so-called “Biosecurity Container” which embodies several more design changes and improvements over and above those noted previously.

[20] As previously indicated, it will take many years before substantive changes in global container fleet design occur, and a degree of impatience regarding the apparent slow progress has been noted among stakeholders. However, survey results show that the design changes, when implemented, will considerably reduce the risk associated with sea-container surfaces. They will also provide an enduring solution.

[21] Container-design changes, once agreed, implemented and standardized, comprise an effective passive measure that requires no further intervention for success.

2.2.2 CTU Code revision

[22] During 2024, the focus group drafted and submitted amendments to the provisions on the prevention and control of pest contamination appearing in the CTU Code (jointly developed by the International Maritime Organization, the International Labour Organization and the United Nations Economic Commission for Europe), at the request of the United Nations Economic Commission for Europe Working Party on Intermodal Transport and Logistics (WP.24).

[23] These amendments, together with other updates and revisions to the CTU Code, will be considered for adoption by a group of experts nominated by each of the three sponsoring organizations at a meeting commencing on 15 December 2025. Following adoption, a revised edition of the CTU Code, incorporating the focus group’s amendments, may be expected to be published in 2026.

2.2.3 Custodial responsibility

[24] As a result of the previous work of the focus group, the “custodial responsibility” approach has been developed. This industry-led approach refers to the responsibility of a receiving container custodian to check it for the absence of visible pests or contamination and to hold the previous party accountable if visible pests or contamination has been found.

[25] Work has continued in 2025 to further develop this approach, in particular by members of the focus group representing the World Shipping Council and the Global Shippers Forum. This has involved

extensive engagement with other global and regional trade organizations representing the different parties in the international container pathway. Through this, information has been developed that is specifically targeted at the different parties in the container supply chain, giving guidance on checking for contamination and the actions to be taken when contamination is identified.

[26] It is intended that this information is compiled as new joint industry guidelines once the agreement of sufficient other trade organizations has been secured.

2.2.4 The World Customs Organization SAFE Framework

[27] Under its 2022–2023 mandate, the focus group made two proposals for inclusion of phytosanitary aspects into Pillar 3 of the World Customs Organization (WCO) SAFE Framework.⁵ Through participation in the WCO Subgroup on the SAFE Framework and the WCO SAFE Working Group sessions, the focus group developed updated proposals relating to Pillar 3, which were presented at the meeting of the WCO Subgroup on the SAFE Framework in November 2024.

[28] These proposals, while receiving an initial positive response, were ultimately not supported unanimously at the November 2024 meeting. The main concern raised was related to the primary purpose of the SAFE Framework. Some participants noted that supply-chain security is considered the primary purpose of the SAFE Framework and held the view that pest contamination measures do not fall within the scope, so those members could not support the inclusion of phytosanitary aspects as proposed.

[29] In November 2025, the SAFE Working Group reviewed the scope of the SAFE Framework of Standards and discussed the future direction of its review cycle. The group decided to pause the 2025–2028 review cycle until 2028 to allow the WCO to determine how best to support effective implementation of the SAFE Framework of Standards among customs administrations. As a result, the focus group's Pillar 3 proposals cannot be submitted for consideration until 2028.

2.2.5 Communications and awareness-raising

[30] The focus group believes that improved education and awareness among stakeholders about the types and consequences of pest contamination in the international container pathway can contribute significantly to risk reduction.

[31] There are already a wide range of materials available to support this aim, issued both by the IPPC Secretariat and by industry organizations, and the focus group has commenced the identification and cataloguing of these (see section 2.4.1). During 2026, it is intended that further material will be compiled or identified that could further raise awareness among NPPOs and industry stakeholders about measures and practical tools to help reduce risks of contamination in the sea-container pathway.

2.3 China and European Union container surveys

[32] Two studies have been submitted to support the IPPC initiative aimed at enhancing the collection of pest risk information relating to sea containers.

[33] China Customs carried out a comprehensive study based on the IPPC sea-container inspection guide ([Sea Container Surveys](#)) from 2024 to 2025, examining biosafety risks in imported empty containers. Inspections and eDNA testing revealed notable pest and invasive species risks, prompting an evaluation of different container designs. The results of the 18-month-long study show that the proportion of contaminated items is 10.35%, nearly 900 species of pests have been discovered, and certain structural and material improvements can help to reduce the likelihood of pests spreading through the sea-container pathway.

[34] The European Union conducted a survey, following the IPPC sea-container inspection guide, carried out by multiple EU member states and involving both NPPOs and customs authorities. The survey

⁵ 2023 Report of CPM Focus Group on Sea Containers ([CPM 2024/25_01](#)), section 3.2.

focused on both empty and packed containers, with data being collected on container cleanliness and the phytosanitary risks associated with the interior and exterior contamination identified. Contamination was detected in 8% of the containers; other than contamination resulting from the presence of soil or sand, the inspected containers were not considered to constitute a phytosanitary risk to the European Union.

[35] More details on the China Customs Container Study⁶ and the European Union Sea Container Survey⁷ and outcomes are published on the IPP.

2.4 Collection of feedback and experiences on the CPM Recommendation on *Sea containers* (R-06)

[36] The focus group is unable to complete Task 1 of its terms of reference: “to assess, subject to the availability of suitable data, the effectiveness and efficiency of the CPM Recommendation on *Sea Containers* (R-06) in reducing pest risks associated with the sea container pathway”. The focus group has requested relevant data from NPPOs through various channels, seeking information from both the period before and after adoption of the CPM recommendation. Unfortunately, aside from previously submitted data from four countries and recent survey responses from China and the European Union, no additional suitable data have been received.

[37] Feedback from several regional IPPC workshops indicates that both awareness and uptake of the CPM Recommendation on *Sea containers* (R-06) remain very low. Low uptake of the CPM recommendation was also highlighted by some NPPOs at the Copenhagen symposium. Reasons cited for the limited uptake include lack of awareness, insufficient supporting guidance, and inadequate capacity. Some NPPOs noted that a *recommendation* on its own is insufficient to address their existing capacity and funding challenges.

[38] The focus group noted the low uptake by NPPOs and agreed that several NPPO-led, risk-management actions identified in the CPM recommendation are important for NPPOs to implement to complement and support the framework of measures that is currently under development (see section 2.2). The focus group will continue to consider how best to achieve this outcome, including whether to propose the identified actions through an ISPM or another appropriate tool.

2.4.1 Communications on IPPC and CPM focus group work

[39] In addition to the development and dissemination of educational and awareness-raising materials, the focus group has produced several other outputs that are considered of wider interest and relevance. These have been made available for distribution by the IPPC Secretariat, subject to normal review and approval procedures. Outputs developed during 2025 are itemized and described in the report of the focus group’s subgroup on Communications. The report of the subgroup is published on the IPP.⁸

[40] One of the outputs is an *Inventory of existing documents*, which catalogues publications and material produced by the IPPC Secretariat, contracting parties, international organizations and industry groups that are applicable or relevant to the reduction of pest risk in the international container pathway.

[41] During 2026 it is intended that a strategy to support communication of the focus group’s recommendations will be compiled and included in the final report to the CPM in the form of a *Stakeholder engagement plan*. This work will be closely coordinated with the work on the development of the framework of measures (see section 2.2).

⁶ China Customs Container Study 2024–2025: <https://www.ippc.int/en/publications/95342/>

⁷ European Union Sea Container Survey 2024: <https://www.ippc.int/en/publications/95343>

⁸ 2025 Report of the CPM Focus Group on Sea Containers’ Communications subgroup: <https://www.ippc.int/en/publications/95341/>

2.5 Consideration of a 2026 workshop

[42] The focus group, as part of their terms of reference, had initiated preparations for a 2026 international workshop to assist in determining the next steps and finalizing a recommendation to CPM-21 in 2027.

[43] Given the poor attendance at the 2025 Symposium in Copenhagen, the focus group does not consider that an additional workshop would warrant the cost and effort involved. At the current stage, seeking additional feedback on effectively confirmed measures is unlikely to provide major benefits. Likewise, despite strenuous efforts, feedback on the effectiveness of CPM Recommendation R-06 has been singularly lacking to date and the planned workshop is not expected to improve this situation.

[44] Accordingly, the focus group proposes to cease planning for a 2026 workshop and concentrate on other means of achieving the communication and feedback goals set out in the terms of reference through webinars and focus group member attendance at industry and NPPO events.

2.6 Collaboration

[45] The focus group will continue its work to further investigate and pursue identified and new collaborative opportunities with the Convention on Biological Diversity Secretariat, the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, the International Maritime Organization, the United Nations Economic Commission for Europe, WCO and the World Organisation for Animal Health. It will also continue to review anticipated developments relating to improved technology, container design, and industry-led proposals including the custodial responsibility model.

Recommendation

[46] The CPM is *invited* to:

- (1) *note* the 2025 update of the CPM Focus Group on Sea Containers.

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