



GSF BRIEFING NOTE

Container Cleanliness & Prevention of Invasive Pest Contamination

Outcomes of the 2nd IPPC Workshop on Pest Risk Mitigation of Sea Containers held at Sofitel Brisbane Central Hotel, Brisbane, Australia on 17-19 July 2023

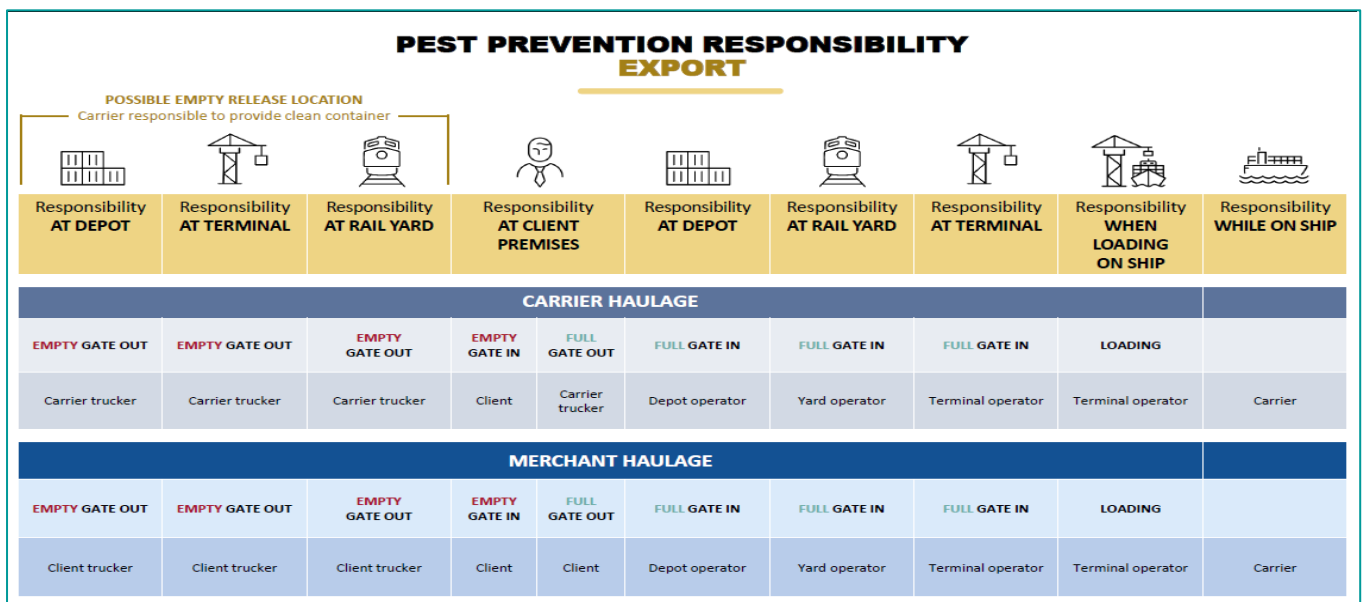
IPPC hosted a second Workshop on *Pest Risk Mitigation of Sea Containers and their Cargoes and the Facilitation of Trade*, from 17 to 19 July 2023 to further discuss and develop possible mandatory measures for reducing the risk of transfer of invasive pest species through contaminated containers. The Workshop followed up outcomes from the first Workshop held in London on 19-20 September 2022, and reported on the work of an on-going CPM Focus Group on Sea Containers.

GSF was represented by Paul Zalai, CEO Australian Peak Shippers Association and GSF Director; Sean van Dort, Chair of Sri Lanka Shippers Council and GSF Chair; and Sal Milici, General Manager Freight & Trade Alliance, and Chair GSF Container Cleanliness Working Group. The principal outcomes were reported to a meeting of the GSF Container Cleanliness Working Group on 26 July 2023. Links are provided to presentation as posted on the IPPC website.

1. Joint presentation by GSF and WSC

A [joint presentation](#) was made by GSF (Paul Zalai) and the World Shipping Council on the principle of *Custodial Responsibility* – that each party handling a container during a shipment is responsible for ensuring it remains free of pest contamination. The presentation featured a WSC graphic showing the parties responsible at each stage of a shipment, but which had been modified in two key respects, following bilateral discussions with GSF:

- the diagram shows the carrier as the responsible party when the container is carried by sea
- the diagram does not feature a requirement for a Verified Pest Prevention declaration to be made by the shipper, as in earlier versions.



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GSF support for the principle of Custodial Responsibility was qualified by the following conditions:

- c. that Custodial Responsibility extends to all parties in the supply chain, including carriage by sea, even where the risks of contamination are low
- d. that the extent of obligations and liabilities have yet to be established
- e. that the approach generates real benefits for NPPOs and industry relative to the costs
- f. that opportunities for incentives to reward highly compliant supply chains with tangible facilitation clearance at destination be considered
- g. that stakeholders dependent on manual labour to conduct container inspections need to provide individuals the means, skills, authority and facilities to comply.
- h. That other actors in the supply chain to whom *Custodial Responsibility* would apply be immediately informed and consulted on these proposals.

These factors should be included in the subsequent development of the Custodial Responsibility approach by the CPM Focus Group on Sea Containers. A specific intervention was made to request the inclusion of shippers and other industry groups in the CPM Focus Group on Sea Containers.

2. Shippers' Priorities

A [presentation](#) was made by Sal Milici on the proposals developed in the GSF Container Cleanliness Working Group to enable shippers to discharge their Custodial Responsibilities, and to promote wider awareness of the need to prevent contamination during packing, including:

- a. Requests of IPPC and NPPOs to develop guidelines for container users on actions to be taken in the event of a discovery of pest contamination.
- b. Support for a phasing-out of wooden-floored containers, which pose a higher risk of pest contamination.
- c. Requests of container operators to provide data to enable container users to assess the risk of contamination of a supplied container, including its journey history; date and location of last deep cleaning; previous 'high risk' cargoes; and whether it has a wooden floor. This approach is termed 'Informed Compliance and was positioned as an essential complement to Custodial Responsibility'.
- d. The inclusion of all supply chain stakeholders in consultations and development of any new mandatory measures by IPPC
- e. A distinction between the 'clearing' of a container and its 'cleaning' of its interior. Clearing a container involved the removal of previous cargoes, and any spillage or contamination arising from them, as well as any packing and securing materials, placards, marks and labels relating to the previous load. Cleaning the container involved the periodic cleaning, decontamination and, if necessary, disinfection of the interior and was the responsibility of the container operator.



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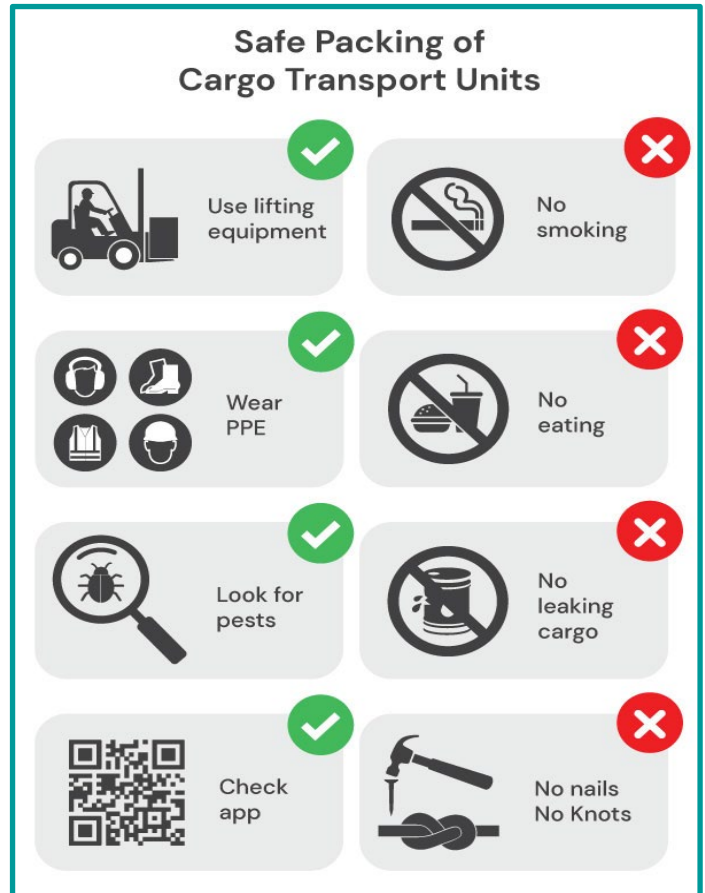
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- f. GSF's commitment to the development of guidance material and advisory tools to support shippers and packers in the safe and responsible packing of containers, including:
 - i. a 'Container Unpackers Checklist'
 - ii. guidance on standards for container cleanliness in procurement contracts
 - iii. a poster/placard for display in packing locations that shows essential 'Do's and Don't's' for container packers and incorporates a QR Code linking to sources of further advice.

3. Digital mobile application

A [presentation](#) was made by Gub McNichol of Wisetech Academy of a prototype digital app to guide shippers and packers on the procedures for the safe and responsible packing of containers, based on advice in the CTU Code. The app presents information on pest risks and preventative measures according to the location and the time of day and year, as determined from the user's device. The app would be free to use and would be capable for delivering spoken information in different languages.

WTA is encouraging feedback on the functionality and usefulness of the app, which may be accessed by linking to the Wisetech website through this QR Code:



Feedback may be sent to Gub McNichol at Wisetech Academy: Gub.McNicoll@wisetechglobal.com

4. Other topics

The GSF delegation drew attention to the following papers that were delivered by other parties at the Workshop:

- a. Construction of containers, emphasising that the absence of gaps in the container structure is the likely attribute in reducing contamination risk, rather than the material of construction. Future container designs needed to be 'gap-free', rather than necessarily 'all-steel'.
- b. Economic incentives, which identified that container depots were not incentivised to clean containers under current arrangements
- c. An assertion by several NPPOs that the risk of external contamination of containers on their external surfaces was greater than that for contamination of internal surfaces, and of cargoes.

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The Chair of the Workshop also asserted that the risk of container contamination appeared to be the same whether or not it contained cargo.

- d. The potential for the application of technologies for the remote monitoring and automated assessment of the condition of containers,
- e. During the Workshop, the Container Shipping Industry representatives had issued a revised edition of the [Unified Container Inspection and Repair Criteria \(UCIRC\)](#), which specified the items of damage on a container that depots should inspect for and should and should not repair. The revised criteria included a requirement to inspect for pest contamination and to remove, clean and dispose of contaminants, if found.

All papers and presentations made at the Workshop are available for download at the [IPPC Workshop webpage](#).

Other observations made by the Container Cleanliness Working Group members:

- That mandatory requirements for the cleanliness of containers should be compatible with existing container security regimes, established for counter-terrorist and anti-criminal purposes. (e.g. US CT-PAT and EU ICS2 requirements)
- That container journey history information is known to shipping lines together with a record of previous cargoes but its compilation into a single accessible database is the principal barrier to be overcome in making the information more widely available.
- That different definitions of 'contamination' and of 'risk of contamination' were being used by different stakeholders that often led to confused and inconclusive discussions about the severity of the problem and the degree of cleanliness expected of containers.
- The absence of any proposal from the Chinese NPPO for the mandatory cleaning of containers prior to use, as originally suggested in the Sea Containers Task Force and the threat of which had prompted WSC to develop its VPP proposals. It was confirmed that the Chinese NPPO had attended the Workshop but made no interventions on this subject.

GSF comment

During the course of the Workshop the GSF representatives successfully and convincingly communicated the key messages developed by the CCWG, including:

- The conditions for our support of *Custodial Responsibility*,
- The need for wider consultation with other stakeholders
- The contribution of new advice and awareness-raising materials for shippers and other users of containers.
- The need for GSF participation on the CPM Focus Group developing the next stage of IPPC recommended measures.

Significantly, the shipping industry accepted the need for its inclusion in the *Custodial Responsibility* diagram; did not advance proposals for a VPP declaration or similar; conceded the need for access to a container's journey history and asked IPPC to define the data that was required by NPPOs to enable a risk assessment to be made. GSF's case for the CPM Focus Group to be more inclusive of industry stakeholders was also accepted. These outcomes position GSF as a constructive and innovative partner in the development of any future global measures for container cleanliness.