



**Report of Activities on
Reduction of Pest Contamination Risk
in International Container Supply
Chains
2025-26**

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Report of Activities on Reduction of Pest Contamination Risk in International Container Supply Chains

This document has been jointly prepared by the Global Shippers Forum (GSF) and the World Shipping Council (WSC). Both organizations are international trade associations representing key stakeholders involved in the international movement of goods in freight containers and which participate in the work of the CPM Focus Group on Sea Containers (FGSC). The report describes activities undertaken by GSF and WSC during the past twelve months to further the work of the FGSC and to contribute to the reduction of pest contamination risk in the international freight container pathway.

Global Shippers Forum

Global Shippers Forum (GSF) is the international trade association speaking up for businesses as cargo owners in international trade and global supply chains. Our collective goals are to seek safe, competitively efficient, and environmentally sustainable movement of goods in global trade, through engagement and raising the awareness of the role of shippers. More information is available at: <https://globalshippersforum.com>

World Shipping Council

The World Shipping Council (WSC) is the united voice of liner shipping, the international container and vehicle carriers that make global trade possible. We work with policymakers and industry groups to shape the future growth of a socially responsible, environmentally sustainable, safe, and secure shipping industry. We are a non-profit trade association with offices in London, Brussels, Singapore and Washington, D.C. More information is available at: www.worldshipping.org

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1. Custodial Responsibility

A key finding of CPM's work in the international container pathway is that responsibility for minimizing pest contamination is shared by all parties that use handle or transport a container and its cargo during its journey and that it is impractical and unreasonable to hold any particular party accountable for the actions or inactions of others.

This approach of 'shared responsibility' was enshrined in the revised edition of CPM Recommendation 06, which was adopted at CPM-18 and published during 2024.

Since publication of Recommendation 06, GSF and WSC have jointly developed the shared responsibility approach with their counterparts in other industry sectors, under the name 'Custodial Responsibility'. This has involved developing workable actions that can be taken during routine container packing and handing operations by the different parties involved.

1.1 Principles of Custodial Responsibility

Custodial Responsibility is a measure to reduce the risks of pest contamination of freight containers and their cargoes that are moved internationally by sea, rail and road and navigable waterway. Each party that is involved in providing, packing, handing or transporting a container, whether packed or empty, is expected to undertake four basic responsibilities whilst the container is in their custody:

1. Check for the absence of visible pest contamination on container surfaces and cargoes that are safely accessible
2. Remove and safely dispose of visible contamination or report it to the appropriate NPPO if contamination is serious or if pests are alive.
3. Keep containers and cargoes free of visible pests and pest contamination whilst in their custody.
4. Hold the previous party to account if a contaminated container is received

1.2 Limitations of the Operating Environment

The scope for routine container inspections and interventions by workers is subject to overriding constraints of safe working practices, the availability of specialized handling and inspection equipment, and the need for dedicated training in inspection and pest identification techniques.

An estimated 265 million international container movements took place during 2025, and the practical workings of Custodial Responsibility must take account of these realities if they are to be applied in the routine operating practices of this complex, fast-moving and time sensitive industry that plays a hugely important role in the global economy.

1.3 Terms and Definitions

During 2025, the following definitions were developed or adopted using CPM Recommendation 06 as the basis:

- **Freight container** means cargo transport units that are suitable for repeated use and specially designed to facilitate the transport of goods by one or other modes of transport, without intermediate repacking. They are fitted with devices permitting their transfer from one mode of transport to another; are designed to be easy to pack and unpack; and have an internal volume of at least 1m³ (35.3 ft³). The term “freight container” refers to both packed and empty units but includes neither vehicles nor conventional packaging.
- **Visible** means detectable by the human eye without aid of any supporting instruments or aids such as magnifying glasses and microscopes.
- **Safely accessible** means checks are performed according to the custodian's standard operating procedures, which have been assessed to ensure they can be conducted without risk to the health or safety of people performing them.
- **Remove** means the safe and controlled removal of pest contamination from the surfaces of the container or cargoes in accordance with recommended practices.
- **Safely dispose of** means disposal of pests and pest contamination in accordance with recommended practices and with any applicable legislation in the jurisdiction where the pest contamination is removed.
- **Report to the NPPO** means notifying the designated national or local authorities responsible for plant protection in the jurisdiction where the pests or pest contamination is discovered.
- **Hold the previous party to account** means notify the previous custodian of the container of the discovery of pests or pest contamination on, or in, the container or its cargo.

Two key terms were also standardized, and their usage harmonized with other international conventions and codes of practice. CPM will recognize these definitions as those used in IPPC documents:

- **Pests and Pest Contamination:** Pest contamination in international container supply chains occurs when pests are able to infest or occupy the interior or exterior surfaces of containers, or the cargoes they are carrying, and are then carried unintentionally to other countries where, should they escape, they may become established as invasive pests and threaten native species of plants or animals.

Pests may also be present in cargoes or in materials used to pack and secure cargo in containers, especially wooden dunnage and timber used for blocking and bracing.

For the purposes of Custodial Responsibility, the visible evidence of the presence of pests means:

- Visible forms of animals, insects or other invertebrates (alive or dead, in any lifecycle stage, including egg casings or rafts)
 - Any organic material of animal origin (including blood, bones, hair, flesh, secretions, excretions)
 - Viable or non-viable plants or plant products (including fruit, seeds, leaves, twigs, roots, bark);
 - Other organic material, including fungi; or soil, or water, where such products are not the manifested cargo in the container
 - Soil
 - Plants/plant products/plant debris
 - Seeds
 - Moths, wasps, bees, beetles
 - Snails, slugs, ants, spiders
 - Mould and fungi
 - Insect and bird droppings or waste
 - Egg masses
 - Animals, animal parts/blood/excreta and reproductive components or parts thereof
 - Other contamination that shows visible signs of harbouring pests.
- **Clean Container:** For the purposes of Custodial Responsibility, a clean container is one that is free from the following:
 - any previous cargo residues;
 - any securing materials used from previous consignments;
 - any marks, placards or signs associated with previous consignments;
 - any detritus (waste) that may have accumulated in the container; and
 - any visible pest contamination (including any part, seeds, eggs or propagules of such species that may survive and subsequently reproduce; soil; and organic matter).

1.4 Parties with Custodial Responsibility

During 2025, the different parties considered to have 'Custodial Responsibility' in the international container supply chain were further elucidated.

The international movement of containers by sea, rail, road and inland waterway takes place through the coordinated yet sequential actions of many different parties, each performing a distinct role in the 'international container supply chain'. Each of these parties will have custody of the container at different times in its journey and will therefore be responsible for implementing the principles of Custodial Responsibility. Some of these roles may be performed by the same party.

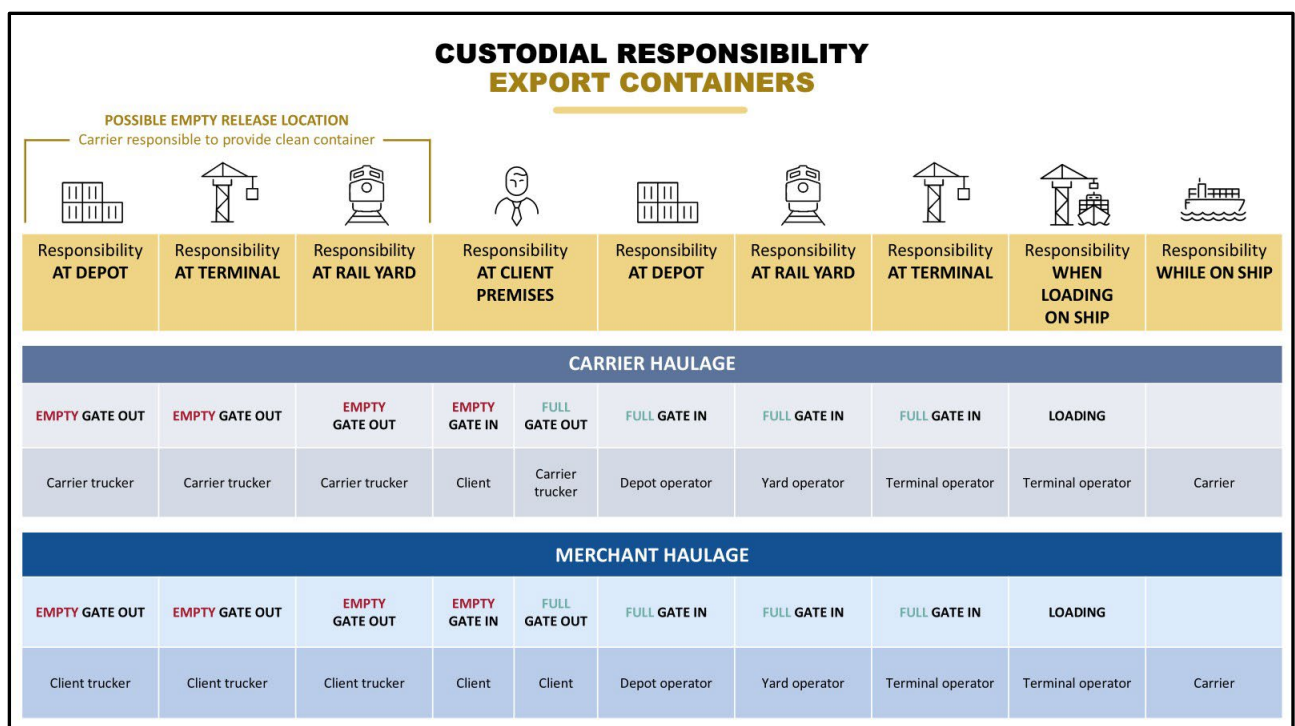
1. The container operator, supplying the empty container.
2. The operator of the container depot, container terminal or rail yard dispatching the empty container.

3. The inland transport operator delivering the empty container to a packing location.
4. The consignor (or shipper) of the goods.
5. The packer of the goods into the container.
6. The inland transport operator delivering a packed or empty container to a container terminal or rail yard.
7. The operator of the container terminal or rail yard storing, handling or loading packed and empty containers.
8. The operator of the vessel on which the container is carried.
9. The consignee (or receiver) of the goods
10. The unpacker of the goods from the container
11. The operator of the container terminal, container depot or railyard where the emptied container is returned to.

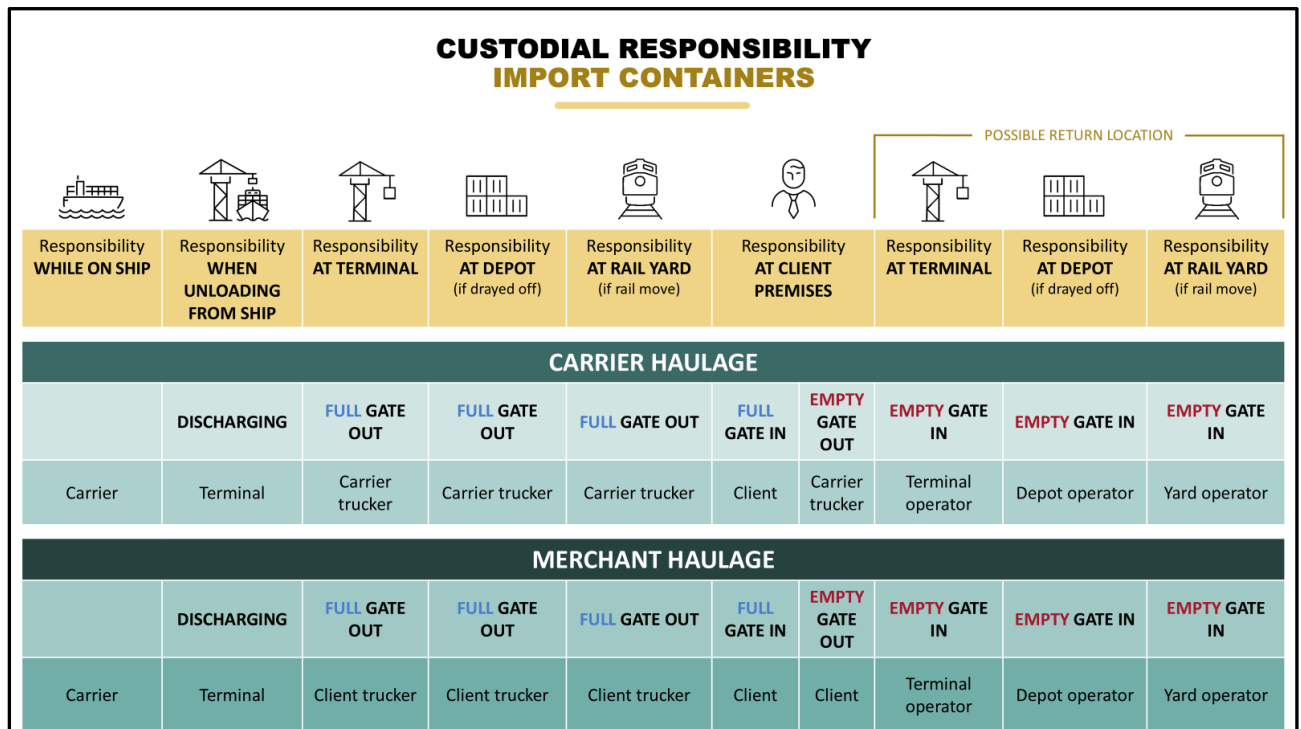
1.5 Diagrams of the Parties in the International Container Supply Chain with Custodial Responsibility

The following diagrams show the different parties who take custody of a container at different points in its journey and are therefore considered to have responsibility for minimizing risks of pest contamination and taking actions should it be discovered.

1.5.1 Export movements



1.5.2 Import movements



Carrier haulage refers to inland transport of a container arranged by the shipping line.

Merchant haulage refers to inland transport of a container arranged by the exporter or the importer (i.e. a shipper or a forwarder).

2. Revision of the CTU Code

The CTU Code is the name used to describe the *IMO-ILO-UNECE Code of Practice on the Packing of Cargo Transport Units*. This 300-page document contains long-standing recommendations on how goods should be packed, secured and transported in trucks, rail wagons and intermodal freight containers. This includes provisions on minimization of pest contamination.

The CTU Code is sponsored and published jointly by three specialized UN organizations, the International Maritime Organization (IMO), the International Labour Organization (ILO) and the Economic Commission for Europe (UNECE). It is relied on by shippers, packers/loaders, carriers, depots and terminals in road, rail and sea transport as authoritative guidance on safe packing and operating procedures. In 2022, the co-sponsors agreed to commence a full revision of the Code for the first time since 2014.

2.1 Phytosanitary content of the CTU Code

As part of this updating process the FGSC was invited to contribute revised content for those parts of the Code addressing pest contamination risks and their prevention. A sub-group of the Focus Group developed appropriate content drawing heavily on existing IPPC

recommendations and other guidance material. The revised content was submitted to UNECE in September 2024

In December 2025, a Group of Experts nominated by each of the three sponsoring organizations and their member governments, together with industry experts met to review the entire content of the revised CTU Code. This included the revised content that had been prepared by the FGSC. Despite significant challenges by some delegations the FGSC content was robustly defended by WSC and the integrity of the provisions remained.

This content includes a revised Chapter 12 of the Code that sets out the risks of container contamination and the principal ways it can be reduced. This is supported by a separate Annex 11 which contains more detailed advice sourced from IPPC guidance material. The most significant advance, however, is that specific responsibilities for taking steps to minimize pest contamination of containers now appear under each of the parties with specific roles in the packing, handling and transport of freight containers. Thus, Custodial Responsibility has effectively been incorporated into the revised edition of the CTU Code.

2.2 Adoption of the revised CTU Code.

The Group of Experts meeting approved the finalized text for the revised edition of the CTU Code for transmission to the respective co-sponsors for formal adoption or approval. This process is likely to take place during 2026 and a revised edition of the CTU Code is expected to be published during 2027. A report of the meeting containing details of the finalized text was compiled by GSF and WSC and sent to the FGSC. A consolidated text showing the full phytosanitary content of the revised CTU Code will be compiled and submitted for inclusion in the Final Report of the Focus Group on Sea Containers.

2.3 Future updating of the CTU Code.

The three sponsoring specialized UN organizations will also be invited to approve arrangements for the more frequent updating of parts of the CTU Code to keep its recommendations aligned with advances in regulation, technology, and industry practices as well as experience gained in operations. GSF and WSC strongly encourage CPM to take note of the new arrangements when they are approved and to ensure IPPC representation in the bodies established to review and revise the technical content of the CTU Code. This role has been performed during the multi-year revision process by GSF and WSC acting on behalf of the Focus Group (occasionally in the face of significant resistance to the measures proposed!) but this patronage by industry should not be relied on as a permanent arrangement after the Focus Group has stood down.

Given the high profile that phytosanitary aspects have now achieved, GSF and WSC strongly encourage CPM to consider providing for formal participation of IPPC-interests in the revision arrangements for the CTU Code, once they have been adopted and promulgated by the three sponsoring organizations.

3. Next Steps

GSF and WSC continue to believe that Custodial Responsibility has the potential to become an effective and reliable measure to reduce the risk of visible pests and pest contamination in the international container pathway. By defining practical and proportionate actions that can be safely taken during routine operations, it has the unique capacity to engage all parties in the objective to stay alert to the risk of pest contamination and to take responsible and decisive action if it is discovered.

However, the emergence of possible mandatory measures, in the form of a draft RSPM being developed by APPPC and PPPO, and a draft ISPM under consideration by the CPM Focus Group, is causing challenges for the adoption of Custodial Responsibility amongst industry stakeholders. This has shown itself as a reluctance by some international trade associations to commit to the detailed workings of Custodial Responsibility as originally developed. Further cross-industry development and specifications of, and ultimately commitment to, the application of Custodial Responsibility are highly dependent on the nature of the measures finally agreed on for inclusion in the RSPM and ISPM

Despite this uncertainty, the adoption of comprehensive measures for the minimization of pest contamination in the revised edition of the CTU Code provides a momentum from which consensus may be achieved on how the CR can be taken forward. GSF and WSC are in dialogue with industry partners on how this may be accomplished.

GSF and WSC remain committed to raising awareness amongst their respective memberships and other parties of the risks and consequences of pest contamination in the international container pathway. This will partly be achieved through the development of appropriate Education and Awareness programs as envisaged in the Framework of Measures being developed by the FGSC. The principles and recommended practices of Custodial Responsibility will also feature in programs to promote the revised CTU Code once it is published.

The form that Custodial Responsibility eventually takes is, however, highly dependent on the evolving nature of the draft ISPM and the Framework of Measures being developed by the Focus Group, and the content of the proposed RSPM and its interrelationship with the FGSC's recommended measures.

GSF and WSC will continue to play a constructive and responsible role in the work of the Focus Group as it embarks on compiling its final recommendations and report to CPM-21.

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