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Prepared by the IPPC Secretariat

Introduction

This report provides a summary of the activities undertaken in 2019 by the IPPC Secretariat and the Sea Container Task Force (SCTF), a Sub-group of the Implementation and Capacity Development Committee (IC) regarding the work related to the phytosanitary risks associated with the movement of Sea Containers.

The SCTF¹ was established by CPM-12 (2017) to guide the work of the Sea Containers programme and facilitate the efficient implementation of the Complementary Action Plan for Assessing and Managing the Pest Threats Associated with Sea Containers² and requested a report back and provide recommendations for the ways forward to CPM-16 (2021).

The CPM Complementary Action Plan identifies two main types of activities:

- I. Measuring the impact of the IMO (International Maritime Organization)/ILO (International Labour Organization) /UNECE (United Nations Economic Commission for Europe)'s Code of Practice for Packing of Cargo Transport Units Code (CTU shipping code³) through:
 - The development of a joint IPPC/IMO/industry protocol for the collection of data related to contamination of sea containers
 - Monitoring the uptake and implementation of the CTU code through industry reporting and NPPO monitoring
- II. Increasing awareness of pest risks of sea containers.

The SCTF worked virtually and held a face to face meeting in Baltimore, USA in September 2019, a full report⁴ of this meeting is posted on the IPP.

I - Measuring the impact of the CTU code

It is understood that the good data is of paramount importance for measuring the impact of the CTU Code uptake on the cleanliness of containers and their cargoes globally and providing evidence to support the recommendations to be developed by the SCTF.

1.1 Sea Container Questionnaire

A questionnaire for Monitoring Sea Container Cleanliness was issued to contracting parties on in March 2019 to help assess:

- NPPOs' current level of monitoring of sea containers
- NPPOs' implementation of existing industry guidelines for container cleanliness
- what type of data about container cleanliness was currently collected by NPPOs

NPPOs were also requested permission to present to the SCTF, the data collected. This questionnaire was open for five months however the response level was not as high as desired, with only 36% of contracting parties (n=66) fully or partially completing the questionnaire (2 non contracting parties also participated). This means that results will not fully reflect all NPPOs so they should be interpreted with care. An executive summary and overview of the results of the Questionnaire are available in

¹ Terms of Reference of the Sea Containers Task Force (SCTF) - <https://www.ippc.int/en/publications/84513/>

² Complementary Action Plan for Assessing and Managing the Pest Threats Associated with Sea Containers -

https://www.ippc.int/static/media/files/publication/en/2017/07/Complementary_Action_Plan_CPM12.pdf

³ CTU: <http://www.imo.org/en/OurWork/Safety/Cargoes/CargoSecuring/Documents/1497.pdf>

⁴ SCTF 2019-09 third meeting report: <https://www.ippc.int/en/publications/87972/>

APPENDIX 1 of this paper. The complete information on the findings of the questionnaire is available on the IPP⁵.

1.2 Sea Containers National Surveys:

NPPOs national Surveys on Sea Container Cleanliness is the main way to aggregate data on sea containers cleanliness. The SCTF developed Guidelines on Sea Container Surveys for NPPOs⁶ to help ensure NPPOs inspect and record contamination details in a harmonized way.

The sea containers national Surveys are not progressing as well as hoped and only a few countries, such as Australia, Canada, China, Kenya, New Zealand and the USA are undertaking them.

The SCTF discussed how they would measure the uptake of the CTU Code, however concluded that they would not be able to assess this during their third meeting due to the lack of relevant data from national Surveys, even though data was collected by several NPPOs. It was agreed that more data would be needed to conduct a statistically valid analysis. It was also noted that it would have been useful to have had baseline data to measure against and that it was ambitious to have only a five-year period to measure uptake of the CTU Code.

1.3 Industry Surveys

The industry representatives on the SCTF informed the SCTF during their third meeting that they are not in position to undertake an industry survey as previously agreed, however the possible inclusion of the cleanliness criteria into the IMO CTU inspection programmes could assist in collecting data which would help measure the uptake of the IMO CTU Code.

1.4 Exploring the use of AEOs and WCO Data Models for sea containers cleanliness purposes

The SCTF discussed the potential and the feasibility of using Authorized Economic Operators (AEO) to help ensure sea container cleanliness (the application of the AEO for a wider scale is currently under discussion in the World Customs Organization (WCO)) and to use the WCO Data Models (DM) to track information on sea containers cleanliness.

The existing AEO framework is based on customs requirements and not tailored for phytosanitary aspects. The SCTF felt that consideration should be given to using AEOs to help ensure phytosanitary requirements are met. Possibilities to develop a phytosanitary framework analogous to the Framework of Standards to Secure and Facilitate Global Trade (SAFE Framework) should be investigated. The SCTF considered that if an NPPO is involved in the validation of the AEOs and if the criteria are mutually recognized by all national agencies involved, then the AEOs could be nationally authorized and used *inter alia* to help ensure phytosanitary requirements are met.

With regard to the use of the WCO DM to track sea containers cleanliness, there is a need to conduct a feasibility study to understand the process and clarify who, how and when stakeholders along the sea containers chain, will be involved in data collection and submission. To this end the value of the pre-arrival information is crucial as demonstrated by Australian and New Zealand experiences. Both countries require a declaration from the importer to confirm the cleanliness of sea containers. If not provided then targeted inspections are undertaken. The record keeping is currently being done manually, but if a data model is developed, it could help in the aggregation of information and contribute

⁵ Findings from the 2019 sea container questionnaire on monitoring of sea container cleanliness - https://www.ippc.int/static/media/files/publication/en/2019/11/Sea_container_questionnaire_on_monitoring_of_sea_container_cleanliness_final_191111.pdf

⁶ Guidelines on Sea Container Surveys for NPPOs - https://www.ippc.int/static/media/files/publication/en/2019/03/Sea_Container_Cleanliness_Survey_SCTF_Final_20181116.pdf

to more efficient operations of NPPOs and stakeholders involved. The SCTF agreed to explore the possibility to include additional fields into the import customs declaration which could later be reflected in the WCO Data Mode.

The work on exploring the use of AEOs and WCO DM is being undertaken on two levels. Representatives of NPPOs to the SCTF will work with their national counterparts, while the IPPC Secretariat will approach this from the global point of view through the collaboration with the Secretariat of the WCO.

1.5 IMO Inspection Programmes

The sixth session of the IMO Sub-Committee on Carriage of Cargoes and Containers (CCC - 6) has established a Correspondence Group (CG) which has been mandated to consider contamination and pest control matters with regard to IMO CTU inspection programmes, taking into account the CTU Code. The SCTF and IPPC Secretariat have been working to include sea containers cleanliness questions in the IMO inspection programmes through the participation of the IPPC Secretariat and industry representatives to the SCTF in the CG and the advice provided by a range of NPPOs through their representatives to the CG. If contamination related issues are included in the IMO CTU inspection programmes, then this would assist the IPPC Community in determining the number of incidences of pest contamination of CTUs and their cargoes and complement the data collected by NPPOs, and thus support the identification of ways to manage pest risks associated with the movement of CTUs and their cargoes on the global level.

II - Increasing awareness of pest risks of sea containers

2.1 Revision of the CTU Code

The UNECE and the IMO, two co-sponsor organizations of the CTU Code, have decided to open the CTU Code for revision. A group of experts is to be established and tasked with considering the deficiencies of the Code and providing proposals for its improvement. The IPPC Secretariat has preliminary agreement with the UNECE and IMO to contribute to this revision. If established, the Group of Expert would also look at the use/roll-out of an “App” to support the uptake of the CTU Code. The SCTF discussed different approaches on providing comments for the improvement of the CTU Code. It was thought that pest risk associated issues could be consolidated into one section of the Code. The text of the whole CTU Code will be reviewed with the view of clarifying responsibilities and actions to be undertaken by those who have custody of a CTU along the supply chain.

The SCTF has also discussed the potential of FAO/IPPC Secretariat becoming a co-sponsor of the revision of the CTU Code. It is understood that this could lead to additional commitments and responsibilities and it is still not clear whether the benefits gained by the phytosanitary community in terms of management of the risks associated with the movement of sea containers and their cargoes would warrant the effort. The possibility of co-sponsoring this revision is being investigated by the IPPC Secretariat in consultation with the FAO LEGN.

2.2 The IPPC Sea Container Supply Chains and Cleanliness: An IPPC Best practice Guidance on Measures to Minimize Pest Contamination

The IPPC Guidance document entitled “IPPC Sea Container Supply Chains and Cleanliness: An IPPC Best practice Guidance on Measures to Minimize Pest Contamination” and the related flier entitled “Reducing the Spread of Invasive Pests by Sea Containers” were developed by the SCTF and approved by the IC. These documents identify the key parties involved in the international container supply chains, and describe their roles and responsibilities for minimizing visible pest contamination of sea containers and their cargoes, and best practices they may follow to meet that objective. The documents

are meant for the wide range of stakeholders involved along sea containers chains and are available on the IPP⁷.

2.3 International Workshop on Sea Containers

The SCTF discussed holding an NPPO - Industry workshop on container cleanliness with the leadership of North American Sea Container Initiative and World Bank Group in spring of 2020. The aim of this workshop is to help identify and describe the roles and responsibilities of different stakeholders involved with the container and cargo supply chain; and to identify ways to reduce the risk of pest contamination of containers and their cargoes. In addition to CPs, NPPOs, representatives of industry and other international organizations that have historically been involved with the sea container cleanliness issue retailers, importers and exporters will also be invited and then encouraged to reach out to small suppliers and packers. Participants are expected to come to the workshop with feasible, workable and realistic proposals to facilitate the development of recommendations to the CPM-16 (2021).

CPM is invited to:

- encourage contracting parties to establish sea containers surveys according to the IPPC Guidelines on Sea Container Surveys for national plant protection organizations and submit results to the IPPC Secretariat
- note the executive summary of the Questionnaire on Monitoring of Sea Container Cleanliness (as annexed to this paper and to be annexed to the CPM report)
- note the work of the Secretariat and the Sea Containers Task Force on the inclusion of the sea containers cleanliness among criteria for the Cargo Transport Units inspection programmes of the International Maritime Organization
- encourage contracting parties to get in touch with their national contact points of the International Maritime Organization to support the inclusion of the sea containers cleanliness among criteria for the Cargo Transport Units Inspection Programmes of the International Maritime Organization
- note the IPPC Secretariat's work on the potential of the Food and Agriculture Organization becoming a co-sponsor of the IMO (International Maritime Organization)/ILO (International Labour Organization) /UNECE (United Nations Economic Commission for Europe)'s Code of Practice for Packing of Cargo Transport Units Code
- request the IPPC Secretariat's and Sea Containers Task Force to continue exploring the potential of the use of the Authorized Economic Operators and Data Model of the World Customs Organization
- note the IPPC Secretariat's and the Sea Containers Task Force arrangements on the update of the IMO (International Maritime Organization)/ILO (International Labour Organization) /UNECE (United Nations Economic Commission for Europe)'s Code of Practice for Packing of Cargo Transport Units Code (CTU Code) and potential co-sponsoring of the CTU Code by the Food and Agriculture Organization
- note the guidance document entitled "The IPPC Sea Container Supply Chains and Cleanliness: An IPPC Best Practice Guidance on Measures to Minimize Pest Contamination"
- note the leaflet entitled "Reducing the Spread of Invasive Pests by Sea Containers"

⁷ The IPPC Sea Container Supply Chains and Cleanliness: An IPPC Best practice Guidance on Measures to Minimize Pest Contamination and the flier Reducing the Spread of Invasive Pests by Sea Containers - <https://www.ippc.int/en/core-activities/capacity-development/guides-and-training-materials/>

APPENDIX 1 - Executive Summary and Overview of the Results of the Sea Container Questionnaire on Monitoring of Sea Container Cleanliness

Executive summary

Invasive pests travel around the globe in and on the agricultural and forestry products we trade. They also catch a ride on and in the millions of rail wagons, trailers and sea cargo containers that crisscross our oceans and continents on trains, trucks and ships.

The Sea Containers Task Force (SCTF) was established to support the implementation of the Sea Container Complementary Action Plan (SCCAP) to reduce the pest risks associated with the movement of sea containers endorsed by CPM-12. The SCTF circulated a questionnaire among national plant protection organisations (NPPOs) to assess their current level of monitoring of sea containers and its outcomes, their implementation of existing guidelines and to gauge which data are being recorded and would be available for assessment by the SCTF.

A questionnaire was developed and implemented online using the World Bank's Survey Solutions software. All 183 contracting parties to the IPPC plus 40 local contacts and information points of non-contracting parties were sent an email invitation which included a link to the online questionnaire. The invitations were sent out between 18-20 March 2019 with a deadline for submission of 16 August.

Despite monthly reminders and a request to the CPM Bureau to advocate participation among contracting parties, participation was low, with only 36% of contracting parties (n=66) fully or partially completing the questionnaire (2 non contracting parties also participated – see the section on **Error! Reference source not found.** for further details). An email asking for reasons for non-response was answered by 32 contact points. Not having time and personnel issues (e.g. personnel changes) were most commonly mentioned. Seven NPPOs answered that they could not provide answers as the topic was not considered relevant (e.g. due to being a landlocked country). Five NPPOs explicitly expressed an interest in the topic. One answered that data had been collected but not by the NPPO but by a port authority.

The low response means that results are unlikely to reflect overall NPPO perceptions and activities related to sea containers and their cargo, and they should therefore be interpreted with care.

Participation per region varied, with highest participation in North America (2 out of 2 countries), and lowest in the Near East (only 20% of all Near East contracting parties participated). In absolute numbers, most responses came from African countries (22), followed by European participants (14), and these regions therefore have a larger impact on the overall results presented in this report. Due to the low number of observations, results per region are not presented separately (as these would be based on very few observations for some regions).

Results

The main results are discussed below and presented in Table 1 at the bottom of the Executive summary.

Almost all responding NPPOs perceive containers and their cargo as a risk, but for around a quarter (18 out of 68 countries) this is only the case when the containers are carrying regulated articles. Only three countries did not consider them a risk, but two of these motivated their answer by saying they were landlocked and therefore did not receive sea containers directly. This may indicate a need to raise awareness among landlocked countries and add clarification in future questionnaires, as sea containers entering a country indirectly can still carry a risk.

Close to half of all responding NPPOs (32 out of 68 countries) said they have regulations in place that allow them to deal with the risk of sea containers and their cargo. In all likelihood this is an underestimate as some countries seem to have misunderstood the question as only referring to having regulations specifically relating to containers, rather than any regulations that allow them to inspect containers and act upon found pests.

Of the 66 NPPOs that responded to this question 54 said they inspect containers and their cargo, mostly in targeted inspections (n=32), but also as part of inspections not directly targeting containers (n=22). Most commonly NPPOs that inspect containers do so following official national procedures or guidelines (30 of the 46 countries that inspected containers). Existing industry guidelines such as the CTU Code and the Joint Industry Container Cleanliness Guidelines were each mentioned by only one respondent. The inspections predominantly took place in the port of (un)loading, or in a container depot or (un)packing location.

Measures were taken or authorised if risks on imported containers or their cargo were found said 51 of the 62 countries that answered this question, while 43 NPPOs said to do the same with ready-to-export containers. Of the eight countries that said not to take measures, some indicated they saw no risk, and one country indicated there was no provision for this within their legislation. The most common measure for imported containers is rejection, but cleaning and/or treating containers was also a commonly selected answer. Cleaning and/or treating containers is the most common measure for ready-to-export containers, with equal numbers indicating they would do this with and without unpacking containers first (most do both).

Pests, organisms or other contamination were encountered by almost three quarters of the NPPOs that answered this question (46 out of 61 countries that answered this question). The remaining 16 NPPOs said they had not encountered anything or did not inspect containers. The most commonly selected pre-listed answer options – those selected by at least half the responding NPPOs – were:

- Insects (beetles, flies, etc.) – selected by 39 countries⁸
- Soil – selected by 36 countries
- Plants/plant products/plant debris – selected by 31 countries
- Seeds – selected by 30 countries

All but four of the 43 countries that had found pests on containers and that answered this follow-up question said these included quarantine (32 countries) and non-quarantine pests (35 countries), and 28 NPPOs indicated both. A full list of these pests is included in the annexes. There is not a lot of overlap in the indicated pests, and no quarantine pest was entered by more than three respondents; for non-quarantine pests, this was four respondents. Most pests were found alive or both dead and alive. Almost no-one indicated only to have found dead examples of the pests.

Of the 58 NPPOs that responded to this question, 36 said they did not have an information management system in which information about containers and their cargo was stored. Those countries with a system most commonly enter data about presence of pests (n=18) and the type of contamination (n=17). Contamination location is also entered by more than half the countries with a system (n=14), but the level of contamination (e.g., high/low) is less commonly stored (n=9), and only a minority (n=5) store information about absence of contamination, indicating that structural data keeping necessary to determine the proportion of containers that harbour pests is uncommon. Most countries with an information management system said they were willing to share this information with the SCTF (17 countries).

Table 1 Summary of main results

Questions	# countries
Are containers and their cargo seen as a risk for spreading pests?	68
Yes, regardless of the type of cargo	47
Yes, but only if carrying regulated articles	18
No	3

⁸ In the questionnaire this answer option was included near the bottom of the pre-listed answers and phrased as "Other insects (including beetles, flies, etc.)". Ants, moths, wasps and bees were included in other pre-listed answer options and therefore are not included in this answer.

Are regulations in place to deal with the risk of containers and cargo?	68
Yes	32
Future plans	15
No	21
Are there inspections of containers and cargo?	66
Yes, focussed specifically on containers and their cargo	32
Yes, but not as separate inspections focussed on containers	22
No	17
Are measures taken if risks on containers and cargo are discovered?	62
Yes, on imported containers	51
Yes, on ready-to-export containers	43
No	8
Are pests, other organisms or contamination found on containers and cargo?	61
Yes, including quarantine pests	32
Yes, including non-quarantine pests	35
No, not found or containers and cargo not inspected	16
Is there an information management system for container-related information?	58
No	36
Yes (to varying degrees)	22