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**Group of Experts for the revision of the IMO/ILO/UNECE
Guidelines for Packing of Cargo Transport Units**

Third session

Geneva, 15–17 October 2012

Item 3 of the provisional agenda

Updates on the second draft of the Code of Practice for Packing of Cargo Transport Units

Draft text on biosecurity

Note by the secretariat

1. The secretariat reproduces below a draft text concerning biosecurity, which needs to be read in conjunction with the second draft of the Code of Practice for Packing of Cargo Transport Units (CTU Code).
2. The second draft of the CTU Code has been published as Informal document EG GPC No. 15 (2012).
3. Annexes to the second draft of the CTU Code are reproduced in Informal document EG GPC No. 15 (2012) – Add.1 (Revised) and appendices A to C in Informal document EG GPC No. 15 (2012) – Add.2.

Draft Code of Practice Sections regarding Biosecurity

Chapter 2 Definitions:

[Cleanliness status]:

Clean

A clean CTU will be free from:

- a) any previous cargo residues;
- b) any securing materials used from previous consignments;
- c) any marks, placards or signs associated with previous consignments
- d) any detritus (waste) that may have accumulated in the CTU;
- e) pests and other living or dead organisms, soil, seeds or organic matter [and all items covered by contamination, infestation and invasive alien species] (including their nests, eggs, egg sacks, and body parts).

Comment [B1]: Delete

[Contamination]: shall mean:

- a) the presence of a radioactive substance on a surface in quantities in excess of 0.4 Bq/cm² for beta and gamma emitters and low toxicity alpha emitters, or 0.04 Bq/cm² for all other alpha emitters.
Non-fixed contamination shall mean contamination that can be removed from a surface during routine conditions of transport.
Fixed contamination shall mean contamination other than non-fixed contamination
- b) Presence in a package, storage place, conveyance or container, of pests or other regulated articles, not constituting an infestation.
or
Visible forms of animals, insects or other invertebrates (alive or dead, in any lifecycle stage, including egg casings or rafts), or 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); or other organic material, including fungi; or soil, or water; where such products are not the manifested cargo within the container.
- c) Presence of a minor and unwanted constituent which when mixed with materials used in the construction of the CTU results in detrimental reactions.]

Comment [B2]: Delete

Comment [B3]: Not sure what c) is trying to describe. Can we provide an example?

[Infestation]: Presence in a package or CTU of a living pest of plants or plant products. Infestation includes pathogens, (virus, bacterium, prion or fungus) that may cause infection of plants and / or animals.]

Comment [B4]: Delete

[Invasive alien species] An alien (non-native) species whose introduction and/ or spread threatens biological diversity and includes pests and quarantine pests.
Invasive alien species may be carried within soil, manure and bedding.]

Comment [B5]: Delete

Owner:

means the owner as provided for under the national law of the Contracting Party or the lessee or bailee, if an agreement between the parties provide for the exercise of the owner's responsibility for maintenance and examination of the container by such lessee or bailee..

Pest	Any species, strain or biotype of plant, animal or pathogenic agent injurious to plants or plant products.
Quarantine Pest	A pest of potential economic importance to the area endangered thereby and not yet present there, or present but not widely distributed and being officially approved.
Re-contamination	The re-introduction subt of pests and other living organisms (including their nests, eggs, egg sacks, and body parts) [being found] in or on a clean CTU.
Repositioning	The movement of empty CTUs [from areas of surplus to areas of demand] / [from one location to another]
Note:	All terms will be included within an annex to the Code of Practice. Only those terms actually referred to in the Code will be included in Chapter 2.

Section 4.1 Chain of Responsibilities

CTU [Owners /] Operators

It is the responsibility of the CTU [owner /] operators to provide CTUs that are:

- a) fit for purpose
- b) clean.
- c) free from pests
- ~~e~~d) free from fumigant release.....

Comment [B6]: Delete

Comment [B7]: Delete

Packers:

It is the responsibility of the packer to minimise the risk of re-contamination of the CTU during the packing process, this will include:

- ensuring that doors are closed when packing is not taking place.
- the use of no insect attracting lights
- use air stream at the entrance of the CTU

Comment [B8]: Don't know what this means

Terminal Operators

Port of entry terminals should ensure invasive species are not allowed to go any further

Should minimise the risk of re-contamination of CTUs when at their facility.

Empty containers should be inspected inside and outside for dunnage left and cleanliness.

Loaded containers should be examined on the outside for any residual contamination before allowing for further transport

[Carrier (Marine)

Marine carriers should:

- a) ensure that depots understand and comply with the cleaning guidelines and instructions.
- b) ensure that delivered to packers packing comply with the industry standard for clean CTUs

Comment [B9]: This is redundant as it is already covered by "it is the responsibility for the CTU operator to provide CTUs that are....clean...".

Comment [B10]: Not sure what b) means. Not sure a) is the responsibility of the carrier.

Section 4.2 Chain of information

[note about clean status reporting]

Chapter 8 Before packing CTUs

Section 8.6 Safety and Biotic Checks

Biotic Checks

The CTU should be provided in a clean state, which means that it is free from any debris, packing material or marks associated with previous cargoes and that free from any other contamination. When undertaking the exterior checks, check the under structure with a torch for any signs of re-contamination particularly:

- along bottom rails of containers
- within forklift pockets
- in and around the corner fittings
- underside and cross members
- container tops where necessary

During the interior checks, look for signs of nests or animals particularly in open section at the header over the door and at the front end.

The CTU should be provided in a clean state, which means that it should not show signs of re-contamination. Examples of re-contamination will be the presence of any of the following:

- Soil
- Plants/ plant parts/debris
- Seeds
- Moths
- Snails
- Slugs
- Ants
- Mould
- Fungi
- Spiders
- Snakes/lizards
- Bees
- Wasps
- Frass
- Egg sacs
- Animals (including frogs)
- Animal parts/ blood/ excreta

Comment [B11]: Delete paragraph

- Reproductive components or parts thereof
- Other contamination that shows signs of harbouring pests.]

More Detail can be found in Annex A

Re-contamination of CTUs can be categorised into two types, Low Level Contamination and High Level Contamination.

Low level contamination (non-actionable)

Low level contamination can be defined as small amounts of soil of sufficient depth that can be removed immediately or within five minutes, with minimal effort or use of equipment.

[Containers that have low levels of contamination completely removed from them will be allowed to exit the wharf gate without any further quarantine intervention at that point.]

Comment [B12]: Delete – Quarantine and quarantine intervention are not defined terms

High level contamination (actionable)

A high level of soil contamination is defined as being of such a depth and quantity that the checker cannot easily remove the soil adhering to the container, is inaccessible, is of a high volume or quantity and is imbedded or attached to a degree that only mechanical (e.g. high pressure cleaning) methods can be employed to remove the contamination.

[Containers with high levels of contamination are directed to a quarantine approved premises for treatment/cleaning prior to release back into the import pathway.]

Section 8.8 Positioning the CTU

Wheeled operation

When a CTU is to be packed on two or more days, it is important that the CTU can be closed overnight. Firstly to protect the cargo from theft, but also to prevent nocturnal creatures entering.

If CTUs can be backed up to an enclosed loading bay, it is likely that there will be a roller shutter door which can be closed to seal off the rear of the CTU. As the CTUs doors will be trapped open by the loading bay structure they cannot be closed.

Where the CTU cannot be closed in-situ because of the loading bay structure, or where to secure the area the CTU would need moving then the packer should consider positioning the CTU so that the doors to the facility and / or the CTU can be closed and access for packing is gained by a removable ramp.



Grounded operation

When landing CTU make sure that the area is clear of any debris or undulations in the ground that may damage the under-structure. Damage to the cross members or rails may result in charges being levied against the packer.

Packers should not position CTUs in such locations where there is a risk of re-contamination. This means that, whenever possible, CTUs should be placed on a hard pavement clear of soil, vegetation and overhanging trees.



CTU should not be positioned where there is mud, vegetation or standing pools of water as these can harbour pests, insects and other animals.



Chapter 9 Packing and Securing Cargo

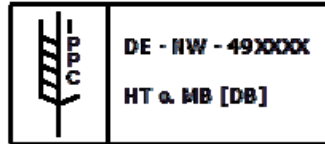
Section 9.1 Measures and conditions before packing

If a CTU is destined for a country with wood treatment quarantine regulations¹, care should be taken that all wood in the unit, packaging and cargo complies with the International Standards for Phytosanitary Measures, No. 15 (ISPM 15)². This standard covers all forms of wood packaging material that may serve as a pathway for pests posing a pest risk mainly to living trees. They cover wood packaging material such as crates, boxes, packing cases, dunnage³, pallets, cable drums and spools/reels, which can be present in almost any imported consignment, including consignments that would not normally be subject to phytosanitary inspection.. Approved measures of wood treatment are specified in Annex I of ISPM 15. Wood packaging material subjected to these approved measures should display the following specified mark:

¹ See Appendix A

² Secretariat of the International Plant Protection Convention, Food and Agriculture Organization of the United Nations: Guidelines for Regulation Woods Packaging Material in International Trade

³ Consignments of wood (i.e. timber/lumber) may be supported by dunnage that is constructed from wood of the same type and quality and that meets the same phytosanitary requirements as the wood in the consignment. In such cases, the dunnage may be considered as part of the consignment and may not be considered as wood packaging material in the context of this standard.



In this mark, the first line shows the ISO two letter country code followed by a unique number assigned by the national plant protection organization to the producer of the wood packaging material, who is responsible for ensuring that appropriate wood is used. The second line shows the abbreviation for the approved measure used (HT for heat treatment, MB for fumigation with methyl bromide). Where debarking is required the letters DB should be added to the abbreviation of the approved measure.

Comment [B13]: How does this square with the sentence below that "Irrespective of the type of treatment applied, wood packaging material must be made of debarked wood"?

The use of untreated dunnage or pallets and then fumigating the packed container with methyl bromide or any other alternative fumigant is not an approved treatment method and should not be employed.

Comment [B14]: don't understand this paragraph

Irrespective of the type of treatment applied, wood packaging material must be made of debarked wood. For this standard, any number of visually separate and clearly distinct small pieces of bark may remain if they are:

- less than 3 cm in width (regardless of the length) or
- greater than 3 cm in width, with the total surface area of an individual piece of bark less than 50 square cm.

For dunnage treated with methyl bromide the removal of bark must be carried out before treatment because the presence of bark on the wood affects the efficacy of the methyl bromide treatment, therefore timber with bark exceeding the sizes given above should not be used. For heat treatment, the removal of bark can be carried out before or after treatment and if found can be removed before packing and the bark disposed of by incineration.

Comment [B15]: This paragraph appears to contradict above paragraph

The following articles are of sufficiently low risk to be exempted from the provisions of this standard⁴:

- wood packaging material made entirely from thin wood (6 mm or less in thickness)
- wood packaging made wholly of processed wood material, such as plywood, particle board, oriented strand board or veneer that has been created using glue, heat or pressure, or a combination thereof
- barrels for wine and spirit that have been heated during manufacture
- gift boxes for wine, cigars and other commodities made from wood that has been processed and/or manufactured in a way that renders it free of pests
- sawdust, wood shavings and wood wool
- wood components permanently attached to freight vehicles and containers.

⁴ Not all types of gift boxes or barrels are constructed in a manner that renders them pest free, and therefore certain types may be considered to be within the scope of this standard. Where appropriate, specific arrangements related to these types of commodities may be established between importing and exporting NPPOs.

Chapter 11 On completion of packing

Once the CTU has been packed and sealed and ready for transport from the packer's facility, a final check should be made of the exterior to ensure that there are no signs of re-contamination.

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