

Informal meeting on Code of Practice for Packing of Cargo Transport Units

at the request of the United Nations Economic Commission for Europe Working Party on Intermodal Transport and Logistics

Geneva and virtual, 5-6 July 2023

Prevention of pest contamination

Submitted by ETS Consulting

Introduction

In accordance with decision of the Working Party on Intermodal Transport and Logistics (WP.24) at its sixty-third sessions (ECE/TRANS/WP.24/147, para 80) and further to the absence of the consideration towards the establishment of the Group of Experts by the Sectoral Advisory Bodies of the International Labour Organisation (ILO) at their fourth seating on 13–15 January 2021 an informal pre-work to the Group of Experts on the Code of Practice for Packing of Cargo Transport Units (CTU Code) was constituted in 2021. Part of the work proposed in the first meeting of that group was to consider amendments to the CTU Code resulting from on-going considerations by the IPPC (CTU-Code/2021/second-informal-meeting/12).

At the second meeting it was decided that this work should be held until the IPPC and the IPPC Focus Group's subgroup on revisions to the CTU Code have concluded their work. This work continues and their findings are expected in 2024.

Minimizing pest contamination of containers and their cargoes is a shared responsibility and by applying best practices these parties can keep containers and their cargoes clean. This will help to prevent the introduction and spread of pests through international commerce. CTUs and particularly containers are also likely to move through ports and reach their final destinations faster and with less expense if they are clean.

This document has been prepared to provide place markers to identify possible amendments to the CTU Code and should not be taken as the final proposal.

It is important to note that the proposals shown below are those that have been suggested by members of the Informal Group or Intersessional Group members, and their inclusion in the table are for information.

Part A General amendments resulting from changes to Definitions

Note: Some of the amendments listed below may be subject to other amendments listed in the second section

1.4.6 Chapter 6 (CTU properties), chapter 7 (CTU suitability) and chapter 8 (arrival, checking and positioning of CTUs) should be considered to select the appropriate CTU for the cargo to be carried and to ensure that the CTU is fit for its intended purpose. Additional guidance to these topics is provided in annex 4 (approval plates), annex 5 (receiving CTUs) and annex 6 (minimizing the risk of pest contamination). More information on the properties of the various CTU types is provided in informative material IM3, more information on species of concern regarding pest contamination may be obtained from informative material IM4.

Table 1: Summary of contents

8	Arrival, checking and positioning of CTUs	A4	Approval plates	IM4	Species of concern regarding pest contamination
		A5	Receiving CTUs		
		A6	Minimizing the risk of pest contamination		

3.7 Unpacking

- Do check that the identification number on the CTU and, when the CTU should be sealed, the seal serial number, are as shown on the transport documentation.
- Do check the exterior of the CTU for signs of leakage or pest contamination.
- Do use proper equipment to cut the seal if affixed.
- Do ensure the CTU is safe to enter. Be aware that the atmosphere in the CTU may be dangerous – ventilate before entering.
- Do open the CTU with caution as cargo might fall out.
- Do record every package as it is removed noting any markings and damages.
- Do remove all securing and protection material for reuse, recycling or disposal.
- Do clean the interior of the CTU to remove all traces of the cargo, especially loose powders, grains and noxious materials and fumigants, unless otherwise agreed with the CTU operator.
- Do remove all marks, placards and signs regarding the previous cargo from the exterior of the CTU once it has been cleaned.

4.2.11 All parties identified within section 4.2 should minimize the risk of pest contamination of CTUs when in their custody. This may include the following:

- Implementation of appropriate pest management programs;
- Removal of any plants, plant products or visible pests taking into account the roles and responsibilities of each party within the supply chain and, further, the impossibility of inspecting the interior of closed and sealed CTUs for pest contamination.

For more information see annex 6.

- 8.2.2.9 When undertaking the exterior checks, the CTU should be checked for any signs of pest contamination particularly:
- Along bottom rails;
 - Within forklift pockets;
 - In and around the twist lock fittings;
 - Underside and cross members;
 - On tops where necessary.
- 8.2.4.1 All CTUs should be provided clean and pest-free, but the type will dictate the standard that can be expected.
- 8.2.4.4 Following receipt of the CTU the packer should prevent pest contamination. Examples of pest contamination will be the presence of any of the following:
- Soil;
 - Plants/plant products/debris;
 - Seeds;
 - Moths, wasps and bees;
 - Snails, slugs, ants and spiders;
 - Mould and fungi;
 - Frass (insect and bird droppings or waste);
 - Egg sacs;
 - Animals (including frogs), animal parts/blood/excreta and reproductive components or parts thereof;
 - Other contamination that shows visible signs of harbouring pest contaminants(including alien species which carry risks of becoming invasive at the site of arrival of CTUs)
- 8.3.2.4 Packers should not position CTUs in such locations where there is a risk of pest contamination. This means that, whenever possible, CTUs should be placed on a hard pavement clear of soil, vegetation, overhanging trees and away from flood lights.

Annex 5. Receiving CTUs

- 8.1.2 The consignee should return the CTU in the same state that it was delivered. This means that the CTU should be:
- Completely empty, clean and pest-free. A clean and pest-free CTU should be free of all cargo residues, , signs of pest contamination, packing, lashing and securing materials marks, signs and placards associated with packing the CTU or the cargo, and any other debris removed. This includes fumigant materials or other noxious substances (see definitions in chapter 2 of this Code). Personal protective equipment should be provided for such work;
 - Returned in a timely manner as agreed with the CTU operator. CTUs in the supply chain and associated road vehicles, if separate, are often scheduled for immediate reuse or positioning. CTU operators may charge demurrage if the CTU is not returned as soon as practically possible after unpacking.
- 8.2.1 If additional cleaning beyond a thorough sweep of the CTU is required the consignees should consider the following techniques:

- Washing – wash the interior of the CTU using a low pressure hose and a scrubbing brush (if required). To remove contamination a suitable additive or detergent can be used;
- Power washing – internal faces using a medium pressure washing device;
- Scraping – areas of contamination can be removed by light scrapping. Care should be taken not to damage the paint work, or flooring.

8.2.3 Contamination of the CTU can be found in many different guises:

- Damage to the interior paint work where the surface finish becomes cracked, flaky or softened by contact with a substance;
- Stains and wet patches to any part of the CTU, especially the flooring, which can be transferred to a cloth by light wiping. Small dry stains that do not transfer to the cloth are considered as non-transferrable and may not be considered as contamination;
- Pest contamination or pest contaminates as defined in chapter 2 Definitions.

8.3.6 Plants, plant products, visible pests, animals and other pest contaminates should be disposed of as described in annex 6.

12.3.1 Upon unpacking the CTU, it may in agreement with the CTU operator either be returned to the CTU operators' facility or transported to a new consignator/packer/shipper. Under either scenario, unless otherwise agreed, the consignee is responsible for ensuring that the CTU is clean and pest-free, free of cargo residues and noxious materials .

Annex 6. Minimizing the risk of contamination

1 Introduction

1.1 The delivery of a clean and pest-free CTU to the packer is of little use if the CTU becomes contaminated by pests during its movement within the supply chain. Appropriate measures should be taken to ensure contamination does not occur. This should include:

- Storing the CTU an appropriate distance away from pest habitats or resident pest populations (the distance will depend on the pest);
- Storing the clean CTU in areas free of risk from pest contamination by vegetation, soil, free standing water or unclean CTUs;
- Taking species' specific measures where pest contaminates are nominated by importing countries;
- Fully paved/sealed storage and handling areas;
- Safeguards should be applied in specific situations to prevent attracting pests such as when using artificial lights, or during seasonal pest emergence periods and occasional pest outbreaks.

1.2 Where CTUs are moved to a storage area, packing area, port of loading, or are transiting through another country, prevention measures should be taken to avoid contamination.

3 Pests, insects, animals etc. that can cause pest contamination

3.1. Soil can contain spores, seed and eggs of one or more pest contaminates, and therefore should not be carried on or in the CTU internationally. Soil can be found at floor level in the internal corrugations of the side wall, in the internal angles of the corner posts and externally in the corner fitting apertures and body, fork pocket openings and on the upper surfaces of the cross rail bottom flanges (see figures 6.2 and 6.3).

3.1.2 Pest contamination of the CTU will generally result from positioning the CTU on mud, or a soft surface. Care should be taken to prevent the CTU from scraping across the ground surface.

- 3.3.3 Individual ants should be swept out of CTUs if possible, but larger colonies, require the entire colony to be destroyed and removed for incineration.
- 4.1 The contaminant treatment method should be that most effective for the contamination present. Consideration should be given to containment and treatment of pests that have a potential for spread. In some cases national authorities may request the specimen be collected for identification purposes.
- 4.2 If a CTU is found to have a minor pest contamination, cleaning can be effected using one of the following methods:
- 4.4 Intermodal operators may have contracts with pest control organizations who may be employed to remove serious pest contamination.

Part B Possible amendments to text

3.3bis Pest contamination prevention

- **Do** store CTUs in areas that are regularly inspected for pest contaminants and cleansed / sterilized accordingly to reduce the risk of pest contamination.
- **Do** inspect the inside and outside of the empty CTU to ensure that it is clean and pest-free before it is to be released for packing.
- **Do** inspect the exterior of packed CTUs prior to transport and at interchange locations to confirm that the CTU remains pest-free.
- **Do** clear and clean the cargo staging and packing area to ensure that it is free from pest contaminants.
- **Do** notify the appropriate pest contamination competent authority of any pest contamination is observed.
- **Do** dispose of all pest contaminants in accordance to the requirements of the pest contamination competent authority.
- **Do** apply safeguards in specific situations to prevent attracting pests such as when using artificial lights, or during seasonal pest emergence periods and occasional pest outbreaks.

8.2.3.1bis The CTU should be clean and pest-free. Where required any signs of any pest contamination should be reported to the appropriate pest contamination competent authority.

9.1.1 Packers should ensure that:

- The packing process is planned in advance as far as practical;
- Incompatible cargoes are segregated;
- Special handling instructions for certain cargoes are observed;
- The maximum permitted payload is not exceeded;
- Restrictions for concentrated loads are complied with;
- Restrictions for eccentricity of the centre of gravity are complied with;
- The cargo and securing materials:
 - complies with the International Standards for Phytosanitary Measures when applicable and
 - is inspected to confirm that it is pest-free and there are no signs of any pest contaminants.

- 12.2.2.bis Persons preparing a CTU for unpacking should inspect the exterior to confirm that it is pest-free, and on opening the doors and during unpacking continuously monitor the cargo and the interior of the CTU that there are no signs of any pest contamination.
- 12.3.2 When disposing of cargo residues, cargo associated waste and pest contaminates, the applicable environmental regulations should be considered. Wherever practicable, dunnage bags and other securing materials should be recycled.
 - 12.3.2.1 When wood quarantine requirements apply, timber bracings and packing/securing material of natural wood, not bearing the appropriate IPPC marking, (see annex 7, section 1.14) should be disposed of as required by national or local plant protection regulations.
 - 12.3.2.2 If any signs of pest contamination are observed, and when required, notify the appropriate pest contamination competent authority and / or dispose of the pest contaminates in line with 10bis.

Annex 5. Receiving CTUs

- 1.2.1bis Inspect the exterior of the CTU for signs of any pest contamination before opening and during unpacking continuously monitor the cargo and the interior of the CTU that there are no signs of any pest contamination.