



İstanbul :

03.07.2019

Sayı : 2503

Our Reference:

Konu : **Konteyner ve Yüklerinin Haşere Kontaminasyonu Konusunda Kargo ve Konteyner Taşıma**Subject: **Komitesi (CCC 6) 'ne Önerinin Desteklenmesi Hk.**

Sirküler No: 411 / 2019

İlgi: Uluslararası Deniz Ticaret Odası (International Chamber of Shipping-ICS)'nın 26.06.2019 tarihli ve CONT(19)08 sayılı yazısı ve Eki

Sayın Üyemiz,

Dünya Denizcilik Konseyi (World Shipping Council-WSC) tarafından hazırlanan **Konteyner ve Yüklerinin Haşere Kontaminasyonu Konusunda Kargo ve Konteyner Taşıma Komitesi (CCC6)'ne Önerinin Desteklenmesine** yönelik taslak davet ilgi ile ICS tarafından Odamıza iletilmiş olup varsa konuya ilişkin görüşlerin bildirilmesi talep edilmiştir.

İlgi yazı ile, WSC'nin desteklediği IPPC/FAO taslak teklifinde; konteynerlerin haşerelere karşı temiz olup olmadığına ilişkin soruların konteyner denetimlerine dahil edilmesi, konteynerlerin ve yüklerinin haşere kontaminasyonu sayısının daha iyi belirlenebilmesi için deneysel verilerin elde edilmesi, zararlı haşere risklerini yönetmek için uygulanabilir ve küresel bazda konteynerlerin hareketi ile orantılı olarak hedeflenen yöntemlerin geliştirilmesi önerilmiştir. Ayrıca taslak teklifte, yetkili kurum/kuruluşların fazla sayıda sertifikayı incelemesi ve onaylaması için gereken kaynaklara sahip olma olasılıkları bulunmadığı, kaptan veya denizcilik şirketi tarafından doğruluğu ve geçerliliği anlaşılamayan "Temizlik Sertifikalarının" oluşmasına yol açıp yüksek maliyetli uygulanamaz bürokratik süreçlerle sonuçlanabileceği, bunun yerine, farkındalık yaratmak ve gönüllü girişimleri teşvik etmek için hükümet-endüstri ortaklıklarını savunduğu, zorunlu önlemlerin uygun risk değerlendirmesi ve analizine dayanması gerektiği, pratik ve orantılı olmasının önemi belirtilmiştir.

İlgi yazının Odamızda yapılan Türkçe çevirisi Ek-1'de, ilgi yazının ekinde yer alan IMO dokümanı (CONT(19)08) Ek-2'de sunulmuş olup 10 Temmuz 2019 tarihine kadar ilgili görüşlerin Odamıza gönderilmesi hususunda bilgileri ve gereğini arz/rica ederim.

Saygılarımla,

İsmet SALİHOĞLU
Genel Sekreter

EKLER:

Ek-1: İlgi yazı ve Eki Basın Bildirisinin Türkçe Çevirisi (1 syf)

Ek-2: İlgi yazı ve Eki (9 syf)

DAĞITIM:**Gereği:**

- Tüm Üyelerimiz (Web Sayfasında)
- Türk Armatörler Birliği
- Vapur Donatanları ve Acenteleri Derneği
- 13,16,17,18,19,20,22,23,24,25,29,30,32,34,37,40,41,42,43,44 İMEAK DTO Meslek Komitesi Başkanları
- Türk Loydu Uygunluk Değerlendirme Hiz. A.Ş.
- TÜRKLİM
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Bilgi:

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Sirküler No: 411 / 2019

(Serbest çeviridir)

EK-1**Konteyner ve Yüklerinin Haşere Kontaminasyonu Konusunda Kargo ve Konteyner Taşıma Komitesi
(Carriage of Cargoes and Containers - CCC 6)'ne Teklif Davetinin Desteklenmesi**

Yapılması Gereken: Üyelerden, Dünya Denizcilik Konseyi (WSC) tarafından geliştirilen taslak teklifi inceleyerek, CCC 6'ya yapılması beklenen FAO/IPPC gönderisine yorum yapmaları ve sekretaryanın WSC teklifine ortak destek verme niyetini dikkate almaları istenmektedir.

Uluslararası Deniz Ticaret Odası (ICS), Dünya Denizcilik Konseyi tarafından geliştirilen, CCC 6'ya sunulan taslak teklife eş sponsor olarak davet edilmiştir (EK-A). WSC'nin taslak teklifi, Uluslararası Bitki Koruma Sözleşmesi (IPPC) adına Uluslararası Gıda ve Tarım Örgütü (FAO) tarafından yapılması beklenen başvuruyu yorumlamaktadır. Söz konusu FAO/IPPC teklifi (EK-B) konteyner denetimlerinde kontrol edilecek konulara temizliğin dahil edilmesini önermiştir.

WSC'nin taslak teklifi, konteynerler ve içindeki yüklerdeki haşere türünün riski ve zararlarının büyüklüğü ile ilgili deneysel verilerin büyük ölçüde eksik olmasından dolayı FAO/IPPC teklifini desteklemektedir. Konteynerlerin haşerelere karşı temiz olup olmadığına ilişkin soruların konteyner denetimlerine dahil edilmesinin, konteynerlerin ve yüklerinin haşere kontaminasyonu sayısının daha iyi belirlenebilmesi için deneysel verilerin elde edilmesine yardımcı olabileceği, ayrıca ilgili zararlı haşere risklerini yönetmek için uygulanabilir ve küresel bazda konteynerlerin hareketi ile orantılı olarak hedeflenen yöntemlerin geliştirilmesine yardımcı olacağı belirtilmiştir.

Ayrıca WSC'nin taslak teklifi mevcut deneysel veri eksikliğinin; Çin gibi ülkelerin, uygun ve yayınlanmış risk analizine dayanmayan, var olan zorunlu ve kapsamlı önlemleri savunmaya devam etmeleri için bir fırsat sağladığını da bildirmektedir. Bu nedenle, haşere kirliliği yayılımının büyük risklerini temsil eden konteynerlerin ve yüklerin hedeflenmesine yardımcı olmayacak, ayrıca hem sanayi hem de hükümetteki sınırlı kaynakların, tüm küresel konteyner taşımacılığı ağına yayılmasıyla sonuçlanacak ve haşere kontaminasyon risklerini azaltma konusunda ayırt edici bir etkisi olmayacaktır. Yetkili kurum/kuruluşların kelimenin tam anlamıyla on milyonlarca sertifikayı incelemesi ve onaylaması için gereken kaynaklara sahip olma olasılıkları bulunmazken, kaptan veya denizcilik şirketi tarafından doğruluğu ve geçerliliği anlaşılabilen "temizlik sertifikalarının" oluşmasına yol açacak olup yüksek maliyetli uygulanamaz bürokratik süreçlerle sonuçlanabilir. Taslak teklifi bunun yerine, farkındalık yaratmak ve gönüllü girişimleri teşvik etmek için hükümet - endüstri ortaklıklarını savunurken, zorunlu önlemlerin uygun bir risk değerlendirmesi ve analizine dayanması gerektiğini ve - IPPC'nin kendi tespitinden alıntı yapılmasının - haklı, pratik ve orantılı olması gerektiğini vurgulamaktadır.

Yukarıdaki hususlar ile ilgili olarak üyelere, ICS'nin daha önceki "CTU Kodu ve deniz konteynerleri ile haşere hareketini en aza indirmek: Konteynerlerin temizliği için ortak endüstri kuralları" başlıklı ICS sirküler MC (17) 26 ile kısa bir özeti verilen IMO MSC 98/22/2 belgesinde eş sponsorluk yaptığını; WSC'nin, ICS sirkülerinde CONT (19) 03 ve DG (19) 03 (madde 5) 'te belirtilen IPPC'nin Deniz Konteyner Görev Gücü'ne (SCTF) katılımında WSC'yi destekleme konusundaki ilgili Konteyner Paneli kararını hatırlatılmaktadır.

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26 June 2019

CONT(19)08

TO: CONTAINER PANEL

Copy: Marine Committee

All Full and Associate Members (for information)

INVITATION TO CO-SPONSOR A SUBMISSION TO CCC 6 ON PEST CONTAMINATION OF CONTAINERS AND THEIR CARGOES

Action required: Members are invited to review a draft submission developed by the World Shipping Council (WSC), commenting on a FAO/IPPC submission expected to be made to CCC 6, and consider the Secretariat's intention to co-sponsor the WSC submission.

ICS, has been invited to co-sponsor a draft submission to CCC 6, developed by WSC (attached at **Annex A**). The draft WSC submission comments on a submission expected to be made by the Food and Agriculture Organization of the United Nations (FAO) on behalf of the International Plant Protection Convention (IPPC). The said FAO/IPPC submission (attached at **Annex B**) is expected to propose that cleanliness be included in the items to check in container inspection programs.

WSC's draft submission expresses support for the FAO/IPPC proposal. This is because empirical data regarding the types and magnitude of the pest risks associated with containers and their cargoes is still largely lacking. Inclusion of pest cleanliness questions in container inspection programs may assist in obtaining empirical data to better determine the number of incidences of pest contamination of containers and their cargoes, which in turn may facilitate the development of workable, proportionate and targeted ways to manage pest risks associated with the movement of containers globally.

WSC's draft submission additionally informs that the current lack of empirical data provides an opportunity for countries like China to continue to advocate sweeping and blunt mandatory measures that (1) are not based on proper and published risk analysis and therefore would not assist in the targeting of containers and cargoes that represent the great risks for acting as vectors of pest contamination; (2) would result in finite resources in both industry and government being spread so thinly across the entire global container transportation network that they would have no discernible effect in terms of reducing pest contamination risks; (3) would lead to the

production of “cleanliness certificates” whose veracity and validity cannot reasonably be required to be established by the master or the shipping company while competent government agencies are unlikely to have the resources required to inspect and confirm literally tens of millions of certificates issued by an untold number of certificate issuers, and (4) would come at huge costs and merely result in unenforceable bureaucratic processes. The draft submission instead advocates joint government - industry partnerships to raise awareness and promote voluntary initiatives while stressing that any mandatory measures should be based on a proper risk assessment and analysis and – quoting from the IPPC’s own determination – be justified, practical and proportionate.

In relation to the above, members will recall that ICS had previously co-sponsored IMO document MSC 98/22/2 entitled “The CTU Code and minimizing pest movement by sea containers: Joint industry guidelines for cleaning of containers”, a brief summary of which was provided through ICS circular MC(17)26. Members will also recall the pertinent Container Panel decision to support the WSC in its participation at the IPPC’s Sea Container Task Force (SCTF), referenced in ICS circular CONT(19)03 & DG(19)03 (item 5).

Members are invited to review the draft WSC submission in light of the above information, consider the Secretariat’s intention to co-sponsor it, and provide comments, if any, to the undersigned (george.charalampidis@ics-shipping.org) by **Wednesday 10 July 2019**.

George Charalampidis
Secretary to the Container Panel

SUB-COMMITTEE ON CARRIAGE OF
CARGOES AND CONTAINERS
6th session
Agenda item 10

CCC 6/Y/Y/
XX July 2019
Original: ENGLISH
Pre-session public release:

**REVISION OF THE INSPECTION PROGRAMMES FOR CARGO TRANSPORT UNITS
CARRYING DANGEROUS GOODS**

**Comments on FAO/IPPC proposal for inclusion of Cleanliness among the items to
check in Inspection Programmes for CTUs**

Submitted by WSC [et.al.]

SUMMARY

Executive summary: While expressing support for the proposal in document CCC 6/X/X, this document draws attention to proposals made by member governments of the IPPC that, if implemented, could result in significant costs and other implications for international containerized supply chains and impose requirements on masters regarding loading of containers aboard ships.

Strategic direction, if applicable: SD 1

Output: 1.30 (new)

Action to be taken: Paragraph 13

Related documents: CCC 6/X/X/, MSC 98/22/2, MSC.1/Circ. 1497, MSC.1/Circ. 1498

1 This document provides comments on document CCC 6/X/X (FAO), and is submitted in accordance with the provisions of paragraph 6.12.5 of MSC-MEPC.1/Circ. 5/Rev 1.

2 There is consensus internationally amongst competent authorities that containers and their cargoes can *potentially* carry pests that could pose a serious risk to agriculture, forestry and natural resources. However, empirical data regarding the types and magnitude of the pest risks associated with containers and their cargoes is still largely lacking.

3 The co-sponsors therefore agree with the proposal in document CCC 6/x/x that inclusion of pest cleanliness questions in container inspection programmes may assist I in obtaining empirical data to better determine the number of incidences of pest contamination of

containers and their cargoes, which in turn may facilitate the development of workable, proportionate and targeted ways to manage pest risks associated with the movement of containers globally.

4 Minimizing pest contamination of containers and their cargoes is a shared responsibility. As stated in the IMO/UNECE/ILO *“Code of Practice for Packing of Cargo Transport Units”* (CTU Code): “All persons involved in the movement of CTUs also have a duty to ensure, in accordance with their roles and responsibilities in the supply chain, that the CTU is not infested with plants, plant products, insects or other animals...”.

5 The shipping industry fully supports and accepts this principle that for a container operator means that an empty container, when dispatched from a container depot under the control of the shipping company, should be “clean” from visible pest contamination.

6 To assist container operators and container depots in these efforts, several maritime trade associations have developed, and endorsed, the *“Joint Industry Guidelines for Cleaning of Containers”* (document MSC 98/22/2) that provide guidance for identification of types of visible pest contamination, cleaning methods and disposal of pest contamination¹. Development of similar guidelines aimed at other parties in the containerized supply chain, including shippers, packers and consignees, on how to minimize pest contamination for when containers are in their custody should be encouraged.

7 The shipping industry also supports, and actively participates in, joint government-industry efforts to raise awareness of the risks of pest contamination of containers and their cargoes, and to encourage voluntary steps by parties in the containerized supply chain to reduce these risks. A leading example of such collaborative efforts, in addition to the IPPC’s Sea Container Task Force, is the North American Sea Container Initiative (NASCI)².

8 The shipping industry accepts that under certain circumstances, and based on a proper risk analysis and assessment, specific pest risks may warrant the implementation of focused programs and requirements on which the public should be consulted. The Asian Gypsy Moth program jointly developed and implemented by Canada and the U.S. is an example of an initiative based on a transparent risk analysis and supported by a well-defined information and outreach campaign to the shipping industry, for what is required of ships for entry in Canadian and American ports. New Zealand and Australia also have targeted risk-based programs regarding certain countries of origin and/or certain pests such as the brown marmorated stinkbug that have been developed with input from industry and other stakeholders.

9 That regulatory requirements should be based on a proper risk analysis and approach is a core principle in the IPPC’s *“Framework for Pest Risk Analysis”*³. It is also a central premise in the IPPC CPM’s *“Recommendation on Sea Containers”*⁴. And the co-sponsors welcome, and agree, that document CCC 6/x/x stresses that “there should be a common risk based approach with supporting guidelines for managing phytosanitary risks associated with containers and their cargoes”. Nevertheless, we are seeing proposals from member

¹ <http://www.worldshipping.org/industry-issues/safety/joint-industry-guidelines-for-cleaning-of-containers>

² <http://nappo.org/english/north-american-sea-container-initiative/>

³ https://www.ippc.int/static/media/files/publication/en/2016/01/ISPM_02_2007_En_2015-12-22_PostCPM10_InkAmReformatted.pdf

⁴ https://www.ippc.int/static/media/files/publication/en/2017/08/R_06_En_2017-08-23_Combined_UZOHKA3.pdf

governments of the IPPC that are in conflict with this clear guidance from the global regulator of plant pests.

10 Of particular concern are proposals that advocate the promulgation of a mandatory IPPC standard that would require, as a condition for vessel loading in each export load port, that all empty and packed export containers be certified clean by third party certifiers. If implemented, these proposals could have significant costs and other implications for international containerized supply chains. The following estimation may serve as an illustration of the potential costs of the proposals:

In 2018, measured on a per-trip basis, the total number of containers carried in international traffic amounted to approximately 217 million:

- 219 million packed TEUs ~ approximately 131 million packed containers
- 144 million empty TEUs ~ approximately 86 million empty containers
- **Assuming that the cost of obtaining a cleanliness certificate for each container to be loaded aboard ship would amount to US\$ 100 (which may be a conservative estimate) the total annual costs to the container industry could amount to approximately US\$ 20 billion.**

11 The shipping industry does not support such blunt proposals that: (1) are not based on proper and published risk analysis and therefore would not assist in the targeting of containers and cargoes that represent the great risks for acting as vectors of pest contamination,; (2) would result in finite resources in both industry and government being spread so thinly across the entire global container transportation network that they would have no discernible effect in terms of reducing pest contamination risks; (3) would lead to the production of "cleanliness certificates" whose veracity and validity cannot reasonably be required to be established by the master or the shipping company while competent government agencies are unlikely to have the resources required to inspect and confirm literally tens of millions of certificates issued by an untold number of certificate issuers, and (4) would come at huge costs and merely result in unenforceable bureaucratic processes.

12 Instead the shipping industry continues to support joint government-industry partnerships to raise awareness and promote voluntary initiatives while stressing that any mandatory measures should be based on a proper risk assessment and analysis and – to quote from the IPPC's own determination – be *justified, practical and proportionate*⁵.

Action Requested by the Sub-Committee

13 The Sub-Committee is invited to consider the above comments and take action, as appropriate.

⁵ IPPC CPM "Recommendation on Sea Containers"

SUB-COMMITTEE ON CARRIAGE OF
CARGOES AND CONTAINERS
6th session
Agenda item 10

CCC 6/X/X
XX July 2019
Original: ENGLISH

**REVISION OF THE INSPECTION PROGRAMMES FOR CARGO TRANSPORT UNITS
CARRYING DANGEROUS GOODS (MSC.1/CIRC.1442, AS AMENDED BY
MSC.1/CIRC.1521)
FAO/IPPC proposal for inclusion of Cleanliness among the items to check in
Inspection Programmes for CTUs**

Submitted by FAO

SUMMARY

Executive summary: This document proposes that cleanliness be included in the items to check in CTU inspection programmes. This would assist in determining the number of incidences of pest contamination of CTUs and their cargoes to complement the data collection by national plant protection organizations (NPPOs), and thus support the identification of ways to manage pest risks associated with the movement of CTUs and their cargoes on a global level.

Strategic direction, if applicable: SD 1 Improve implementation

Output: 1.30 (new)

Action to be taken: Paragraph 7

Related document: MSC 100/17/9
MSC 100/20, paragraphs 17.5 and 17.16, and paragraph 17.23
MSC.1/CIRC.1442; MSC.1/CIRC.1521

Introduction

1 This document is submitted to follow up on the discussion during MSC 100 regarding revision of the Inspection programmes for cargo transport units (CTUs) carrying dangerous goods (document MSC 100/17/9, and document MSC 100/20, paragraphs 17.5 and 17.16 that *inter alia* reference a statement of the Food and Agricultural Organization (FAO) on the inclusion of CTU cleanliness in CTU inspection programs). It proposes specific cleanliness questions for inclusion in these programs. Inclusion of the proposed questions will not unduly add to the workload of inspectors and will assist in determining the number of incidences of pest contamination of CTUs and their cargoes, thus complementing data collected by national plant protection organizations (NPPOs). That in turn, will facilitate the identification of ways to manage pest risks associated with the movement of CTUs globally.

Background

2 The International Plant Protection Convention (IPPC)* is an international plant health treaty “with the purpose of securing common and effective action to prevent the spread and introduction of pests of plants and plant products, and to promote appropriate measures for their control” (IPPC, Art. I). The IPPC has 183 contracting parties. The Convention and its international standards for phytosanitary measures (ISPMs) make provisions for the inspection, treatment and certification of consignments, the establishment of phytosanitary import requirements for plants and plant products, as well addressing phytosanitary issues related to packaging and conveyances.

3 Containers and their cargoes can potentially carry pests that could pose a serious risk to agriculture, forestry and natural resources. Once introduced, such pests are very difficult and expensive to control or eradicate. They can severely damage agricultural production, affect property values, and reduce water availability and quality. The total cost of lost revenue and clean-up can run into billions of dollars.

4 As packed and empty containers move globally there should be a common risk based approach with supporting guidelines for managing phytosanitary risks associated with containers and their cargoes. To that end several activities are being undertaken by the IPPC community such as:

.1 Development of a draft ISPM on Sea containers was intended to provide guidance to NPPOs to identify particular pest risks associated with containers, appropriate phytosanitary mitigation measures and verification procedures. However, the eleventh session of the Commission on Phytosanitary Measures (CPM 11 (2016)) has agreed that the harmonization of managing the risk associated with sea containers through the ISPM is complex to achieve. It was decided to change the status of the topic on Minimizing Pest Movement by Sea Containers (2008-001) to pending and reconsidered by the CPM, in maximum five years (CPM 16 (2021)), to allow for the implementation of the International Maritime Organisation (IMO) /International Labour Organisation (ILO)/United Nations Economic Commission for Europe (UNECE) Code of Practice for Packing of Cargo Transport Units (CTU Code) and an analysis of its impact on reducing pest movement by CTUs;

.2 Adoption of the CPM recommendation on Sea Containers (R-06) †that promotes container cleanliness and complements the CTU Code;

.3 Participation in the joint revision of the CTU Code to incorporate several elements of phytosanitary importance;

.4 CPM12 (2017), endorsed the Sea Containers Complementary Action Plan for Assessing and Managing the Pest Threats Associated with Sea Containers (SCCAP)‡. The SCCAP includes measures to increase awareness of pest risks, as well as to monitor the uptake, and measure the impact of the CTU Code on pest contamination of containers. The Sea Containers Task Force (SCTF), which is a Sub-group of the CPM Implementation and Capacity Development Committee (IC), supervises the actions contained in the SCCAP. The SCTF consists of experts from NPPOs, regional plant protection

* IPPC - <https://www.ippc.int/en/core-activities/governance/convention-text/>

† CPM Recommendation on Sea Containers - <https://www.ippc.int/en/publications/84233/>

‡ 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

organizations (RPPOs), the maritime industry and international organizations. Participation by the IMO is envisaged in the Terms of Reference (ToR) of the SCTF;

.5 The SCTF developed a Sea Container Cleanliness Survey Guideline[§] to be followed by NPPOs when CTUs cleanliness surveys are conducted. The data collected during the surveys will assist in drawing a baseline for the uptake and impact of the CTU code regarding container cleanliness, as well as in determining further complementary actions to be included in the SCCAP or any additional instrument as deemed necessary.

.6 Further information on the IPPC's work on sea containers may be found on the International Phytosanitary Portal (IPP)**.

4 In order to collect meaningful and comprehensive data and facilitate the minimization of pest risks associated with the movement of containers and their cargoes, the data aggregated by NPPOs should, wherever possible, be complemented with data gathered by government authorities and industry. In this regard, the SCTF noted at its second meeting on 5-9 November 2018, Shenzhen, China, the proposal for a new work item for the strengthening of inspection programmes for CTUs carrying dangerous goods and clarification of the selection criteria for such container inspection programs contained in document MSC 100/17/9. The SCTF was of the view that the new work item proposal is relevant from a container cleanliness perspective, in particular because, if approved, it would ensure that the guidelines contained in annex 1 to MSC. 1/Circ. 1442 as amended by MSC. 1/Circ. 1521, to be revised as appropriate, would be compliant with, and adequately refer to, the CTU Code, including its sections on CTU cleanliness.

5 Following the SCTF deliberations, the FAO/ IPPC Secretariat made a statement during MSC 100 recommending the inclusion of CTU cleanliness among the items to check in CTU inspection programmes (document MSC 100/20, paragraph 17.16).

Proposal

6 As issues related to the CTU cleanliness are important integral parts of the CTU code, it is proposed to include CTU cleanliness questions among the items to check in CTUs inspection programmes. Specifically, it is proposed to amend the Guidelines for the Implementation of the Inspection of Cargo Transport Units (section 5 of Annex 1 of MSC. 1/Circ. 1442 as amended by MSC. 1/Circ. 1521) as follows:

Inspection Details

Inspection Date	
Country of Inspection	

Container Details

[§] IPPC Guidelines on Sea Container Surveys for NPPOs - <https://www.ippc.int/en/publications/87069/>

** IPP - <https://www.ippc.int/en/core-activities/capacity-development/sea-containers/> and <https://www.ippc.int/en/core-activities/capacity-development/capacity-development-committee/ic-sub-group/ic-sub-group-sea-container-task-force-sctf/>

Country of Export (if available)	
Contamination Detected	<input type="checkbox"/> Yes <input type="checkbox"/> No
Empty, Packed or Unpacked Container	

Contamination Details (if applicable)

Location of Contamination (mark which is appropriate)	
Internal ceiling <input type="checkbox"/>	External top <input type="checkbox"/>
Internal floor <input type="checkbox"/>	External side <input type="checkbox"/>
Internal wall <input type="checkbox"/>	External underside <input type="checkbox"/>
Internal door <input type="checkbox"/>	Cargo <input type="checkbox"/>
Cargo packaging <input type="checkbox"/>	Multiple (please include description below) <input type="checkbox"/>
Other details (please include further details describing the location below as appropriate)	
.....	
.....	
Contamination Type (mark which is appropriate)	
Live organisms (e.g. live insects/arthropods and animals)	<input type="checkbox"/>
Dead organisms (e.g. dead insects/arthropods and animals)	<input type="checkbox"/>
Environmental contaminants (e.g. soil, plant material, seeds, feathers)	<input type="checkbox"/>
Unmanifested cargo residues (e.g. stored products or grains)	<input type="checkbox"/>
Please include further description/comments below, as appropriate	
.....	
.....	

Action Requested of the Sub-Committee

7 The Sub-Committee is invited to consider the above proposal and take action, as appropriate.
