Prevention of Pest Contamination of Containers: Joint Industry Guidelines for Cleaning of Containers

Prepared by:
Prevention of pest contamination of containers: Joint Industry Guidelines for Cleaning of Containers

About the authors:

The Container Owners Association is the international organisation representing the common interests of all owners of freight containers. The principle aims of the COA are to provide global expertise, to promote common standards and to facilitate international lobbying. More information is available at: www.containerownersassociation.org

ICHCA

The International Cargo Handling Coordination Association (ICHCA), founded in 1952, is an independent, not-for-profit organisation dedicated to improving the safety, security, sustainability, productivity and efficiency of cargo handling and goods movement by all modes, and through all phases of national and international supply chains. ICHCA’s privileged non-government organisation (NGO) status enables it to represent its members and the cargo handling industry at large, in front of national and international agencies and regulatory bodies. More information is available at: www.ichca.org

IICL

The Institute of International Container Lessors (IICL) is the leading trade association of the container and chassis leasing industry. The IICL's membership engages in leasing marine cargo containers and chassis to vessel operators and other organizations on a broad international basis. Members own or manage a significant portion of the global leased container and U.S. chassis fleets. More information is available at: www.iicl.org

World Shipping Council (WSC)

The World Shipping council (WSC), with offices in Washington and Brussels, represents the global liner shipping industry on regulatory, environmental, safety and security policy issues. WSC members operate approximately 90 percent of the global liner capacity, providing approximately 400 regularly scheduled services linking the continents of the world. Collectively, these services transport about 60 percent of the value of global seaborne trade, and more than US$ 4 trillion worth of goods annually. More information is available at: www.worldshipping.org
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Introduction

These guidelines are complementary to the guidance given in the IMO/ILO/UNECE Code of Practice for Packing Cargo Transport Units ("CTU Code") regarding prevention of pest contamination of containers. 1

Chapter 4 of the CTU code, "Chains of Responsibility and Information" states in para.4.1.4: "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...".

The purpose of this document is to provide guidance on how this may be achieved by container operators for those containers that are in their direct control. As explained in document CPM 2016/INF/06 before the International Plant Protection Convention (IPPC)2, “in terms of control, especially as related to cleanliness in terms of transport of plant pests, the only place and time where a shipping company has the ability to do anything to a container is during the period in a repair depot. [However,] many containers may not go through a repair depot before packing or movement empty”.3 When reviewing and implementing these guidelines it should also be kept in mind that the locations with the most potential for pest contamination of both the cargo and the container structures are those where the containers are being packed. Such locations are under the control of the shipper or the packer acting on behalf of the shipper. Shippers and packers are encouraged to consult the CTU Code regarding their responsibilities to ensure that they put measures in place to minimize the movement of visible pests and re-contamination of the container while in their custody.

These guidelines are not intended to replace individual container operators’ cleaning guidelines. Nor do they replace applicable local regulatory pest contamination measures and requirements.

Finally, these guidelines are additional to industry guidelines regarding container cleanliness for non-pest contamination such as paint, oil etc.; such non-pest contaminations fall outside the scope of this document.

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1 The CTU Code can be accessed at: http://www.unece.org/trans/wp24/guidelinespackingctus/intro.html
3 “Repair depots” are also referred to as "container depots", which is the term used in these guidelines. Examples of containers not going through container depots include: Containers moving directly from unpacking locations to port terminals for loading aboard ship; release of empty containers for packing directly from port terminals; triangulation or so-called “street turns” where the container, after unpacking by the consignee, is moved directly to a shipper’s or packer’s premises for packing.
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Interchange points, inspections and measures to be taken

The following table identifies the various points of change of custody of a container in the supply chain and associated measures that, in accordance with the guidance in the CTU Code, may be taken in order to minimise visible pest contamination. In conformance with the CTU Code, “pest contamination” means 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, intact or broken wood packing material, including dunnage); or other organic material, including fungi; or soil, or water; where such products are not the manifested cargo within the container.

*NOTE: The table is without prejudice to existing local requirements at either the export, import, packing and/or unpacking locations*

<table>
<thead>
<tr>
<th>Where</th>
<th>When</th>
<th>Inspection</th>
<th>Responsible party</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Container depot</td>
<td>Gate In</td>
<td>Structural deficiencies, internal cleanliness, visible pest contamination</td>
<td>Depot (for container operator)</td>
<td>Remove contamination</td>
</tr>
<tr>
<td>Container depot</td>
<td>Gate Out</td>
<td>Internal cleanliness, overall condition, suitability for cargo, visible pest contamination</td>
<td>Depot (for container operator)</td>
<td>Remove contamination or substitute for suitable container</td>
</tr>
<tr>
<td>Pack point</td>
<td>Receipt for packing</td>
<td>Internal cleanliness, overall condition, suitability for cargo, visible pest contamination</td>
<td>Shipper or Packer on behalf of shipper</td>
<td>Reject container or remove contamination; prevent recontamination</td>
</tr>
<tr>
<td>Export Terminal</td>
<td>Gate In</td>
<td>Container Number, Seal number, obvious major defects, obvious exterior pest contamination</td>
<td>Terminal</td>
<td>Report defects or contamination to container operator, or reject per local protocol</td>
</tr>
<tr>
<td>Export Terminal</td>
<td>Load on vessel</td>
<td>Container Number, obvious major defect, obvious exterior pest contamination</td>
<td>Terminal</td>
<td>Report defects or contamination to container operator</td>
</tr>
<tr>
<td>Import Terminal</td>
<td>Unload from vessel</td>
<td>Container Number, obvious major defect, obvious exterior pest</td>
<td>Terminal</td>
<td>Report defects or contamination to container operator</td>
</tr>
</tbody>
</table>

4 “Visible” means detectable by the human eye without the aid of any supporting instruments or aids such as magnifying glasses and microscopes. This applies to both the exterior and interior of the container; however, as discussed, it may not be possible to inspect the roof and undercarriage of the container for visible trace soil and other pest contamination.

5 Exception – Automated gates

6 Only highly visible/obvious external contamination. Exception – automated gates

7 Exception – Automated Terminals

8 Only highly visible/obvious external contamination. Exception – automated Terminals
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<table>
<thead>
<tr>
<th>Phase</th>
<th>Activity</th>
<th>Information Required</th>
<th>Responsible Party</th>
<th>Action Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transhipment Terminal</td>
<td>Unload/Load to/from vessel</td>
<td>Container Number, obvious major defect, obvious exterior pest contamination, seal number</td>
<td>Terminal</td>
<td>Report defects or contamination to container operator and/or responsible authority as required</td>
</tr>
<tr>
<td>Unpack location</td>
<td>Receipt for unpacking</td>
<td>Container Number, Seal number, obvious defects, visible pest contamination</td>
<td>Consignee</td>
<td>Remove contamination or notify responsible authority as required; prevent recontamination</td>
</tr>
<tr>
<td>Unpack location</td>
<td>Prior to return</td>
<td>Internal cleanliness (contractual obligation), visible pest contamination</td>
<td>Consignee</td>
<td>Remove contamination; prevent recontamination</td>
</tr>
</tbody>
</table>

Inspection by terminal operators will necessarily be limited to obvious defects and contamination of the exterior of the container, and without inspecting the understructure (“undercarriage”) of the container by lifting it, on a best efforts basis. Visual inspection of the exterior of the container may not be possible due to safety requirements or other operational constraints.

Similarly, and due to safety concerns regarding working at heights and access to undercarriage components while on transport vehicles such as a chassis, container depots typically cannot inspect the roofs or the understructure of containers for visible trace amounts of soil or other pest contaminations.

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9 Exception – Automated Terminals
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Container Cleanliness

The CTU Code provides that any empty container used for the carriage of dry, special or reefer cargo should, when dispatched from a container depot under the control of the shipping company, be “clean”.

For the purpose of these guidelines, “clean” means that the empty container’s exterior and interior\(^{13}\) and, for reefer containers, also ventilation inlet grilles and floor drain holes, should, at the time of dispatch, have no visible presence of any of the following:

- Soil
- Plants/plant products/plant debris
- Seeds
- Moths, Wasps, Bees
- Snails, Slugs, Ants, Spiders
- Mould and Fungi
- Frass (insect and bird droppings or waste)
- Egg sacs
- Animals, animal parts/ blood/excreta and reproductive components or parts thereof
- Other contamination that shows visible signs of harbouring pests.

\(^{13}\) It is imperative that no attempt is made to enter a container until any unknown residue has been identified and the appropriate safety precautions have been taken.
Cleaning methods for visible pest contamination

This section contains recommendations on cleaning methods for visible pest contamination. In cases of doubt about how to proceed, the local National Plant Protection Office (NPPO) or, if animal origin contamination, the local Quarantine Office should be contacted for guidance.

Proper consideration should be given to disposal of pest contamination residues in order to minimize the potential for pests to flourish.

- **Seeds and Plant parts**

  Sweep up or vacuum ensuring that all residues collected are sealed in an airtight bag and stored for disposal. Dispose of bags based on advice from the local NPPO or plant quarantine organisation.

- **Insects, Egg masses and Nests**

  Minimize risks of escape of live insects. Incapacitate live insects, larvae or pupae using an insecticide spray, fumigation or other means as advised by the local NPPO. All egg masses, nests etc. should be sealed and all inhabitants be rendered incapable of escape and/or incapacitated. Sweep, vacuum or scrape up ensuring that all residues collected are sealed in an airtight bag and stored for disposal. Dispose of bags based on advice from the local NPPO or plant quarantine organisation.

- **Soil, Dirt, Mud**

  When and where deemed safe, remove soil, dirt or mud on the exterior and interior by scraping, sweeping or washing. Remove the material from the top down to avoid re-contaminating an area already cleaned.

  If scraping and/or sweeping is used the residues should be collected, and sealed in a bag for future disposal. Dispose of bags based on advice from the local NPPO or quarantine office.

  Soil, dirt or mud removed by washing may, pursuant to local environmental regulations, be allowed to drain away with the wash water, subject to any requirements that wash water residues are appropriately treated to prevent that pests escape to the local environment.

  Soil, dirt or mud on the exterior that can be clearly identified as having come from the depot location, where the cleaning is carried out, may be disposed of in accordance with existing practices for general cleaning residues.
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- Live animals, snakes, birds etc.

Minimize risks of escape of all live animals and isolate them, if possible, preferably in the container. For rats, mice and other vermin, the services of a Pest Removal company should be considered. For exotic species or domestic animals consult the agency responsible for capture or dealing with such matters e.g. Quarantine Authority, Zoo, or a veterinarian etc. for further action.

Minimize risk of escape of birds found associated with container unless the bird species have been identified as native to the location. Consult the agency responsible for capture or dealing with such matters e.g. Quarantine Authority, Zoo, or a veterinarian etc. for further action.

Minimize risk of escape of all snakes found associated and isolate them, if possible. Even if the species is clearly identified as native to the location they should not be released in, or remotely near, the depot. Consult the agency responsible for capture or dealing with such matters e.g. Quarantine Authority, Zoo, or a veterinarian etc. for further action.

Animal disease risk from livestock and birds should be mitigated by using appropriate disinfectants after cleaning the container to deactivate any remaining disease agents. Consult the local Quarantine authority for recommendations for appropriate disinfectants. The disinfectants used should not contain phenols or strong perfumes as these may give rise to taint problems with future food cargoes.

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Jointly prepared by:

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