



September 25, 2023

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**Re: Joint Comments on the CPM Recommendations for Minimizing Pest Risk Associated with Sea Container Pathway**

Dear Mr. Grierfer, Mr. Horn and Mrs. Van Herzele,

On behalf of the International Association of Movers (IAM) and the FIDI Global Alliance (FIDI), we are grateful for the opportunity to comment and offer the following perspective on the CPM Recommendations for Minimizing Pest Risk Associated with the Sea Container Pathway.

**Global Household Goods Moving Industry Perspective**

As representative organizations of the global household goods moving, relocation and related industry services, IAM and FIDI have unique perspectives, as our member companies normally provide services for one-time beneficial cargo owners. The items moved are unique, and unlike commercial industries, come from dwellings, homes and other environments of varying formats.

Both organizations ensure their members, which include the packers and drivers of household goods, are aware of the significant impact invasive pests can have on the local ecology of a community. They provide best practices and guidance to their affiliated companies (e.g., packers' training) to help raise awareness and mitigate the risk of pest contamination or transfer.

**Sea Container Pest Contamination Reduction Recommendations**

We understand that the Commission on Phytosanitary Measures (CPM) is expected to make key decisions in 2024 on long-term guidance to minimize the risks associated with the international sea container pathway and that the Focus Group on Sea Containers is working in the interim to develop recommendations for such prospective guidance. As members of the Container Cleanliness Industry Advisory Group (CCIAG) and the Global Shippers Forum (GSF) working group, we recommend that a



representative of the industry/shippers be officially represented in the CPM Focus Group as development of any new global measures by CPM must be concluded with representatives of all the parties affected, if they are to be effective.

IAM and FIDI member companies work to ensure to the degree possible that household goods items that may eventually be packed into sea containers are without pests or other contaminants. This includes providing updated country-specific guides with information on pest prevention to our member companies. The ability for the household goods industry and other shippers to load their cargo into a clean sea container is critical to minimizing damages and overall pest contamination. The CPM-18 final document should be updated to reflect that the container operator and owner be the designated party to oversee that process.

As noted in the CPM recommendations, *complete elimination of the risks posed by the sea container pathway is not feasible; therefore, risk reduction should be the objective of recommended activities and guidance.* We agree with that assessment, and support voluntary measures to reduce the transfer of pests throughout the supply chain and container pathway process.

IAM and FIDI were pleased to see removal of the World Shipping Council's proposal that Shippers provide a verified pest prevention (VPP) certification. Given the inherently complex nature of global shipping and IPPC's safeguarding continuum concept, VPPs are an imperfect solution placing the entire burden on the shipper and container user community.

Throughout our engagement with the IPPC through stakeholder and consultation meetings, we believe there are a number of measures that can be employed now and over time to reduce the risk of pest contamination.

Responsibility for pest minimization should not only start with a clean container, but also recognize the direct interaction that those in the transportation chain typically have with the sea container itself. Motor carriers (drivers) do not typically load or unload the container out of terminals, rail yards or depots. Those loading cargo in and out of the sea container should also do a visual inspection (via checklist), which is one of our recommendations for pest mitigation efforts (see below). The terminal operators and owners of these depots should do their best to ensure the container itself is contaminant free prior to the next step in the journey.

While the above steps work jointly together to reduce pest contamination throughout the shipping process of the sea container, IAM and FIDI strongly caution against use of overly complex custodial chains of responsibility for the sea container, as they may imply company/individual liability, or similar legal obligations for any discovered pest contamination.

While preventive measures can and should be taken to reduce the spread of pests or other invasive articles, there are too many possible scenarios that exist to tie rejected or turned away sea containers to any one party. IAM and FIDI consequently are in favor of a simplified version of the 'Custodial Responsibility' principle, with key focus on pest prevention actions at origin, consisting of three main stages, outlined below:

1. Shipping line responsible to provide clean container for pickup at depot or port.
2. Shipper responsible to maintain cleanliness inside and out during loading and up to port of loading.
3. Receiver responsible to ensure clean container is returned to depot or port.



Given the number of ports, countries, and regions containers travel to over the course of one (or many journeys), we recommend that any suggested measures be as visual and practical as possible. Some examples to reduce pest contamination and spread include:

- Use of placards to warn of potential pest risks (visual)
- APP and Smartphone technology (to be developed over time)
- Container cleaning instructions (sweeping, visual and graphics)
- Access to container journey history (to be developed over time)
- Appropriate lighting at terminals, rail yards and other depots

Thank you for your consideration of our comments, and we look forward to future engagement with the IPPC and all stakeholders.

Sincerely,

A handwritten signature in blue ink that reads "Charles L. White".

Charles L. White, M.Ed., CAE  
President, International Association of Movers

A handwritten signature in blue ink that reads "Derek Duffy".

Derek Duffy  
President, FIDI Global Alliance

### **About IAM**

IAM is a premier moving and forwarding industry global trade association. With more than 2,000 members, its companies provide moving, forwarding, shipping, logistics, and related services in more than 170 countries for household goods shipments. IAM is officially located in Washington DC, USA. For more information, visit [www.iamovers.org](http://www.iamovers.org)

### **About FIDI**

FIDI is the global alliance of quality-certified international moving and relocation companies. FIDI currently has over 600 Affiliates in more than 100 countries, delivering comprehensive global mobility services to families, individuals and companies. As a global Federation, FIDI is officially located in Brussels, Belgium. For more information, visit [www.fidi.org](http://www.fidi.org)