



World
Shipping
Council

Custodial Responsibility

CPM-20 Side Session
Rome, 12 March 2026

Custodial Responsibility Principles

Apply to all parties



1. Check for the absence of visible pests and contamination on container surfaces and, where applicable, cargoes that are safely accessible.
2. Remove and safely dispose of visible pests or contamination, or, if serious, report to NPPO and take advice.
3. Keep containers and cargoes pest-free while in your custody.
4. Hold the previous party to account if a contaminated container and/or cargoes are received.

Parties with Custodial Responsibility



1. **The container operator, supplying an empty container.**
2. **The operator of the container depot, container terminal or rail yard dispatching the empty container.**
3. **The inland transport operator delivering the empty container to a packing location.**
4. **The consignor (or shipper) of the goods.**
5. **The packer of the goods into the container.**
6. **The inland transport operator delivering a packed or empty container to a container terminal or rail yard.**
7. **The operator of the container terminal or rail yard storing, handling or loading packed and empty containers.**
8. **The operator of the vessel on which the container is carried.**
9. **The consignee (or shipper) of the goods.**
10. **The unpacker of the goods from the container.**
11. **The operator of the container terminal, container depot or railyard where the emptied container is returned to.**

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Industry concerns



- Reluctance by some supply chain parties to commit to detailed workings of CR, at this stage.
- Concerned at creation of new legal liabilities for the condition of the container.
- Unconvinced of the opportunities, practicalities and risks of 'holding a previous party to account' for contamination, given limited bargaining power.
- Strong opposition to workers (e.g. truck drivers and port workers) taking responsibility for an outcome (i.e. container cleanliness) that they have limited opportunity or scope to control in their job functions.

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Industry's alternative approach to mandatory measures



- Custodial Responsibility was being developed by Industry as an alternative to mandatory measures.
- This positioning and justification is being jeopardized by the emergence of
 - draft RSPM by APPPC & PPPO, requiring mandatory shipper certifications and declarations
 - draft ISPM in the CPM Focus Group, scope and requirements yet to be finalized.

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Next steps



- Custodial Responsibility principles remain in CPM Recommendation 06
- Comparable responsibilities plus detailed risk reduction advice and guidance will be included in revised edition of CTU Code, poised to be adopted in the 2026 -27 timeframe.
- Important to note that this means that the CR principles are now being embraced by ILO, UNECE and IMO.
- GSF and WSC are in dialogue with industry partners on how Custodial Responsibility can be taken forward.



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