

# RAMPSUK

The Register of Accredited Metallic  
Phosphide Standards in the United Kingdom

## Guidance on In-Transit Fumigations in the UK

Metallic phosphides are used widely in the UK as a biocide and plant protection product. The metallic phosphides, aluminium phosphide and magnesium phosphide, are applied to stored commodities to eliminate any active insect infestation, protecting the commodity from damage and preventing the spread of invasive pests.

In 2015, during the re-registration for metal phosphide use as a plant protection product, it was deemed safe to perform fumigations using metallic phosphides only if a 5 metre exclusion zone was applied to the active fumigation to protect workers, operators and members of the public from toxic gasses.

Due to the exclusion zone being mandatory for all fumigations, the practice of 'in-transit fumigation' came under closer scrutiny.

In-transit fumigations take place predominantly in shipping containers while they are being transported. This includes the proportion of the container journey by road.

Since the driver of a lorry transporting a fumigated shipping container sits well within the exclusion zone, the HSE were asked to comment on whether this remained a safe practice. RAMPS UK entered into detailed discussions with HSE and the talks were concluded in 2019 with HSE giving the following statement concerning in-transit fumigation by road:

"A safety zone would be very difficult, if not impossible, to maintain around a moving container on the back of a lorry... we are unable to confirm how such a practice could be safely undertaken and therefore cannot endorse it."

It is the responsibility of RAMPS UK therefore, to urge fumigators, hauliers and exporters to eliminate the proportion of the fumigation which involves road transport and to explore options, where possible, of fumigating either at source, at port or at the commodity's destination.

In the meantime RAMPS-UK continue to hold discussion with HSE and the approval holders Detia Degesch to explore the possibility of amending the current authorisations so that an assessment can be conducted specific to this use and, if it can be demonstrated that it can be undertaken safely, to amend the authorisation conditions so that that transporting fumigated containers by road can be permitted.

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