



GUIDELINE

Inspection of empty containers for export

Direction to staff

You must comply with this instructional material under the Practice Statement Framework.

Direction to authorised officers

Authorised officers must exercise powers and perform functions in accordance with any lawful directions or instructions issued by the department.

Direction to industry

This guideline outlines the requirements for the inspection of empty containers for export. All parties with roles and responsibilities explicit in this guideline and legislation must comply with it.

Summary of main points

This document outlines the policy and process for the inspection of empty containers. It includes:

- pre-inspection requirements
- documentation requirements
- empty container inspection and reinspection requirements
- principles for passing and failing container
- requirements for issuing or revoking container approval.

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Purpose of this document

This guideline details the policy and process for the inspection of empty containers for the loading of prescribed goods for export to ensure that the container condition does not compromise the department's phytosanitary certification by:

- ensuring a systematic and efficient examination of containers
- providing assurance that the container will not adversely affect the pest or disease status of the prescribed goods during transit.

Definitions

The terms and definitions relating to this guideline can be found in the Reference: [Plant export operations instructional material glossary of terms](#).

Legislative framework

Consideration must be given to the following legislation before goods are exported and both exporters and AOs must comply with legislation throughout the exporting process:

- *Export Control Act 2020* (Act) and Export Control (Plants and Plant Products) Rules 2021 (Plant Rules)
- Export Control (Fees and Payments) Rules 2021
- *Privacy Act 1988*
- *Public Service Act 1999*
- *Work Health and Safety Act 2011*.

Work health and safety

Inspection AOs must:

- comply with applicable Commonwealth, State and Territory WHS legislation
- comply with their employer's WHS policies and procedures
- read and be familiar with the Reference: [Work health and safety in the plant export environment](#)
- not enter work sites unless it is safe, they are wearing appropriate personal protective equipment (PPE) and have considered any WHS hazards
- discontinue their inspection if, at any time, they consider there is a risk to their safety
- comply with site-specific requirements, unless they assess the requirements as placing them at risk, in which case they must take reasonable action to ensure their safety
- continually assess the possible risks in the different areas of the vessel while performing their duties.

Conduct Pre-Inspection Tasks

Prior to commencing the inspection of an empty container, an AO will need to ascertain whether the commodity to be loaded is a **consumable** or **non consumable** prescribed good.

This information will determine the level of inspection required and is further described below.

When the AO is unable to ascertain whether the goods to be loaded will be non-consumable or consumable, all containers are to be inspected under the assumption that the goods to be loaded are consumable.

Containers to be loaded with non-consumable goods

A non-consumable prescribed good is any plant or plant product that is not for consumption by humans or animals and for which the importing country requires phytosanitary or other certification, e.g. logs, woodchips and cotton lint.

For this level of inspection an empty container must be free from:

- live insect pests in residues
- live insect pests on the structure of the container
- live pests and vermin
- any residue infestible by insects
- structural damage such that insects could enter after loading.

Containers to be loaded with consumable goods

A consumable prescribed good is any plant or plant product that is for consumption by humans or animals, e.g. prescribed grains.

For this level of inspection an empty container must be free from:

- live insect pests in residues
- live insect pests on the structure of the container
- live pests and vermin
- any residue infestible by insects
- structural damage such that insects could enter after loading
- any contaminants (further described below) including vermin carcasses and/or their waste.

Recording Inspection Results

AOs undertaking empty container inspections must ensure that the inspection process is fully documented. Inspection details must be recorded on an approved inspection record. Original inspection records must be retained for at least 2 years and be available for auditing and verification. Inspection records made in PEMS are considered to have been retained and available for audit and verification.

Container Liners and Lamination

Importing country requirements vary and exporters are advised to seek advice prior to export from the importing country on any conditions or requirements they have for the use of container liners or lamination.

Container liners

Pre-fabricated liners such as plywood, hardboards, plastic material, polyethylene, timber or timber like linings may be used to upgrade non-consumable grade containers to consumable (food) grade by applying an impervious layer between the container surface and the goods. Liners are generally acceptable for overcoming superficial problems such as flaky paint, light transferable internal rust and light transferable stains, as they provide protection, prevent transference of stains and avoid floor sanding and other treatments.

Liners that are installed and cover the entire surface of the floor, wall or ceiling of a container prior to loading can be used for both bagged and bulk consumable products. However, partial liners installed to cover portions of a container with the potential to contaminate the consumable goods will be approved for loading bagged products only. In the case of liners, they may be installed immediately after inspection and the container sealed and loaded within 90 days with consumable goods.

Container lamination

Container lamination using transparent or non-transparent plastic film/material is permitted to overcome some superficial problems such as flaky paint, light transferable internal rust and transferable stains as it provides an extra barrier against any potential source of infestation/reinfestation of the goods. Lamination is also acceptable for stained floors/walls, as it provides protection and prevents transference of stains.

The lamination material must be strong enough to withstand loading and transport processes and must comply with [Australian Standards AS2070-1999 \(Plastics materials for food contact use\)](#).

Conduct Container Inspection Tasks

Containers may be inspected at any place where the facilities are fit for purpose. The facility must not compromise the integrity of the container and must have sufficient light so that the AO can conduct the inspection while adhering to WH&S policies.

All prescribed goods for export packed as FCL (full container load) must have a passed result on their empty container inspection record, refer to the Reference: [Plant export document and treatments checklist](#).

Passed containers

When an AO passes a container, they must seal the container with a tamper evident seal if it is not intended to load the container immediately after the container has been inspected.

Containers that are not being loaded immediately in the presence of the AO (or are being transported to a different location) must also have a Passed Empty Container sticker applied to the container door.

The AO must conduct another empty container inspection if:

- the container does not have an intact tamper evident seal, and a valid Passed Empty Container sticker (or the sticker is damaged and the information is obliterated).

If a container is being inspected on site where it is to be loaded, and loading is to be immediately after inspection, then a tamper evident seal and inspection sticker is not required.

Empty container approval period

Empty containers that are inspected and passed remain compliant for 90 days unless it has been revoked or when the loading of product into the container has been completed. In exceptional circumstances, the period that the container approval is valid can be extended beyond the 90 days.

To extend the container approval validity the exporter will need to provide details supporting the request to the department's [Grain and Seed Exports Program](#) before the end of the initial 90 day period. The exporter must supply details of the exceptional circumstances for which an extension is required, a justifiable period of extension, and information that gives assurance that the condition of the container has not changed since inspection and that there has been no compromise of the phytosanitary status of the container, including the security. Once a decision is made the Grain and Seed Exports Program will inform the exporter of the decision and the National or Regional Documentation Hub Manager or Supervisor will be informed to make a record of the additional approved period.

Inspection of containers with liners or non-transparent lamination material

Shipping containers need to be inspected by an accredited AO both prior to the liner being installed and after it has been installed. The AO must inspect the lining itself to ensure that it will not cross contaminate prescribed goods. The AO must also ensure that the liner effectively protects goods against non-infestible residues and materials as well as defects such as stains, rust and flaking paint.

Containers with non-transparent lamination require both a pre lamination inspection and a post lamination inspection. Both the pre and post lamination inspection must be conducted at the same site by the same AO. The containers must meet the standards set for 'non-consumable' goods PRIOR to the application of lamination. Lamination may be accepted if it is not being used to mask unacceptable criteria such as pests, infestible residues or structural damage. The correct and appropriate lamination may be acceptable to overcome some superficial problems such as stains, rust and flaking paint.

Inspection of containers with transparent lamination material

Container inspection for transparent lamination may be conducted after the lamination has been installed. For example, this means that the lamination may be installed at the depot and inspection may be conducted at the export establishment. To be considered transparent, the lamination material must be clear and non-reflective.

Inspection Procedure

When undertaking empty container inspections you must refer to the Work Instruction: [Inspecting empty containers for export](#) to satisfy the requirements of each type of inspection.

It is the AOs responsibility to adhere to all Work Health and Safety requirements when inspecting empty containers. Refer to the Reference: [Work health and safety in the plant export environment](#) for more information.

External Inspection

- The exterior of the container must be free of insect infestation.
- Inspect for structural damage which could result in a consignment becoming infested in transit.
- Prior to entering the container, inspect the areas around the door seals. Ensure that the doors and door seals function correctly to exclude pests.
- Discharge chutes on bulk container doors and roof hatches (if present) must be inspected prior to entering the container. These areas may contain residues from a previous cargo or be infested.

Internal Inspection

- Structural damage is easily located by observing for light inside the container once the doors are closed. AOs request assistance and have the doors closed temporarily while they are inside.
- Examine the ceiling, walls and floor for structural damage, flaking paint/rust scale, moisture/condensation and adhering infestible residues including weeds/seeds.
- Look for any moisture and/or stains and/or odours inside the container. Floors containing stains, including tyre marks that are non-transferable are acceptable. Check that wood planking or lining material used for flooring does not contain holes and is not concealing infestible residue.
- Examine wall/floor angles, particularly in the corners furthest from the doors for infestation and infestible residues.
- Horizontal ledges at or near the wall/roof angles must be free of previous cargo residues. Loose roof supports require careful inspection for residues.
- Check for plywood or other side panelling, residues/infestation which may be present in damaged areas or 'dead spaces'.
- Ventilation holes must be sealed with adhesive tape or an approved mesh to prevent the entry of insects and contaminants into the container.
- Pay attention to lashing rings and poorly fitted panels or planks in which residue and infestation may be present.
- New or internally refurbished containers are acceptable provided there are no strong odours from new paint or sanded floors with the potential to contaminate goods.

- Bulkheads and bag-type liners should not be fitted until after the inspection. The materials to be used must be checked for insects, infestible residues, and contaminants.

Contaminants

Contaminants are also known as non-infestible materials. This refers to any material not capable of being infested by pests, examples include plastic beads, flaking paint, oil residues, loose rust, wet paint, mineral residues, steel shavings, sandblasting grit and grease. Rodent carcasses and rodent droppings are considered contaminants and AOs must ensure these are not present at the time of inspection.

New or internally refurbished containers can have a strong residual odour, particularly if paint has been used. Offensive odours can also carry over from previous cargoes. Such odours are capable of contaminating grain or prescribed goods for consumption and are not permissible in containers loading consumable goods.

Water or moisture must not be present in containers to be loaded with consumable goods. Where the container is wet from treatment it must be thoroughly dried prior to inspection.

Pests of Quarantine Concern

Australian Export legislation, Export Control (Plants and Plant Products) Rules 2021 (Plant Rules), requires that prescribed goods intended for export must not be loaded into a container unless an AO has issued approval for the container.

There are two different types of inspections for empty containers to be loaded with prescribed goods. For empty containers to be used to export prescribed grains and prescribed goods for consumption, an AO must inspect the container for injurious pests, infestible residues, contaminants and other conditions such as transferable residues, odour etc. that could affect the phytosanitary status of the goods that have passed the inspection. However, for empty containers to be used to export non-consumable prescribed goods such as timber, an AO must only inspect the container to ensure that there are no live pests or residue that could harbor pests or conditions which could permit cross-contamination.

Every time an inspection occurs and an AO finds or suspects that live pests inside or outside the container are injurious pests, the container must be rejected. AOs must contact the [Grain and Seed Exports Program](#) for advice on the management of that container.

The AO must be satisfied that there are no live pests in the container; any infestible residues including those behind lining or panel have been removed; and any non-infestible residues will not contaminate the prescribed goods.

Information on these pests of concern are included in the Reference: [Pests and contaminants of grain and plant products](#).

Reasons for Rejection

Containers found unsuitable for loading must be rejected. The presence of the following in a container to be loaded with non-consumable plant products must lead to rejection:

- live insect pests in residues or on the structure of the container, inside or out
- live rodents or evidence of rodent harbouring behind linings
- infestible residue
- excessive soil residues
- structural damage such that insects could enter after loading.

For containers to be loaded with consumable plant products, the presence of the following must lead to rejection:

- live insect pests in residues or on the structure of the container, inside or out
- live rodents or evidence of rodent harbouring behind linings
- infestible residue
- structural damage such that insects could enter after loading
- non-infestible material including but not limited to soil, odours, moisture, transferable oil residues and flaking rust/paint
- rodent carcasses or rodent droppings.

If during the external or internal inspection any of the above pests, residues or structural faults are noted and cannot be rectified at the time of inspection, the container must be rejected and the exporter notified. The reasons for rejection must be detailed on the inspection record. The exporter can then choose to rectify the faults and re-present the container for inspection or return the container to the supplier.

If live *Trogoderma* spp. are found, the empty container must be rejected and treated by fumigation.

Re-inspection of empty container following treatment

Re-inspect empty containers following treatment according to the procedures in the Work Instruction: [Inspecting empty containers for export](#).

If a container has been treated with an insecticide or a fumigant, the AO must **NOT** re-inspect until after the safety precautions (including exposure and airing periods) specified on the registered label have been observed. A gas free certificate from an approved or licensed fumigator must be supplied after fumigation.

Re-presentation after rejection for *Trogoderma* spp.

The AO must not start the re-inspection until they are provided with a Fumigation Certificate and a gas free certificate from an approved or licensed fumigator.

Revoke the container approval

The department's [Grain and Seed Exports Program](#) or an AO may revoke a container approval if they have reason to believe that the condition of the container has changed since the container approval was issued.

To revoke a container approval an AO must:

- notify the client in writing that the approval status of the container has been revoked
- complete a new Empty Container Inspection Record, or record the revocation in PEMS noting in the remarks field the reason for revocation
- remove and destroy the Passed Empty Container sticker if applicable.

If the Passed Empty Container sticker is dated more than 90 days after the inspection date then it becomes invalid and the completed Empty Container Inspection Record will also become invalid.

The container that has either a revoked or an invalid container approval will require a new empty container inspection if prescribed goods are to be loaded into it.

Record keeping

Where documents are not available in PEMS, clients, exporters, registered establishments and AOs must retain documentation in relation to receivals, inspections, audits, registration, accreditation and export permits and certification for a period of at least two years.

Related material

The following related material is available on the department's website:

- [Plant Export Operations Manual](#)
 - Guideline: *Supporting documents for plant exports*
 - Work Instruction: *Inspecting empty containers for export*
 - Reference: *Pests, diseases and contaminants of grain and plant products*
 - Reference: *Plant Export Management System authorised officer user guide - Empty container inspection*
 - Reference: *Empty container inspection record*
 - Reference: *Plant export document and treatments checklist*
 - Reference: *Work health and safety in the plant export environment*
 - Reference: *Australia's plant and plant product export legislation.*
 - Reference: *Plant export operations instructional material glossary of terms.*

The following related material is available online:

- [Australian Standards AS2070-1999 \(Plastics materials for food contact use\)](#)
- [Standards for Food Quality Shipping Containers.](#)

Contact information

- Authorised Officer Hotline: 1800 851 305
- Authorised Officer Program: PlantExportTraining@awe.gov.au
- Grain and Seed Exports Program: Grain.Export@awe.gov.au
- Grain and Seed Exports Program hotline: 02 6272 3229
- Assessment and Client Contact Group: PlantExportsNDH@awe.gov.au.

Document information

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Version history

The following table details the published date and amendment details for this document.

Version	Date	Amendment details
1	28/03/2021	First publication of this guideline for the commencement of the <i>Export Control Act 2020</i> and associated Plant Rules.