



Plant Export Operations Branch

Plant Export Operations Manual

Volume 11: Inspection of Empty Containers

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Introduction

This volume outlines information relating to the inspection of empty containers to be used for the export of prescribed goods.

The aim of an empty container inspection is to ensure that the container condition does not compromise Department of Agriculture phytosanitary certification by:

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

Reference and Instructional Material

- Work Instructions: Authorised Officers (AOs) can use the [work instructions](#) as a quick guide to complete a specific job function. These can be accessed via the downloadable resources link.
- Plant Export Operations Manual:
 - Volume 2: Export legislation
 - Volume 16: Work Health and Safety (WH&S)

Legislation

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 1982*
- *Export Control (Prescribed Goods - General) Orders 2005*
- *Export Control (Plant and Plant Products) Order 2011*
- *Export Control (Fees) Orders 2001*

The legislations listed above are all accessible via the ComLaw website at:
<http://www.comlaw.gov.au/>

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.

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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
- 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 a [Container Approval Record](#) (PE104). Original Container Approval Records must be kept for 2 years and be available for auditing and verification.

Inspection Equipment Checklist

AOs will need access to appropriate inspection equipment to assist in the inspection process. Equipment may include the following;

- Torch capable of being focused to a bright spot
- Scraper for scraping out residues and dislodging rust flakes behind which insects may be harbouring
- Pair of tweezers for removing residues from cracks and also for collecting larger insects found during an inspection
- Hand lens x10 magnification for pest identification
- Pests of Quarantine concern and pest identification information
- Specimen jars to store pests found during inspection

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- Tamper-evident seals
- Passed Empty Container stickers.

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, polyethene, 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.

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Passed containers

Immediately after inspection, if the container is passed as “export compliant”, a Passed Empty Container sticker must be placed on the container door. Containers that are not being loaded immediately in the presence of the AO or are being transported to a different location must have a Passed Empty Container sticker applied to the container door and a tamper evident seal must be placed on the door locking mechanism.

If a container does not have a valid Passed Empty Container sticker or it is damaged and the information is obliterated the AO must conduct another empty container inspection.

Empty container approval period

Empty containers that are inspected and passed as export compliant remain compliant for 90 days. 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 of Agriculture, 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.

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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 ECI3001 Inspection of empty containers 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 Volume 16 Export Occupational Health and Safety (OH&S) 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'.

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- 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) Order 2011*) requires that prescribed goods intended for export must not be loaded into a container unless an authorised officer has issued approval for the container.

There are two different types of inspections for empty containers to be loaded with export compliant prescribed goods. For empty containers to be used to export prescribed grains and prescribed goods for consumption, an authorised officer must inspect the container for injurious pests, infestible residues, contaminants and other conditions such as transferable residues, odour etc. that could affect the export compliant goods. However, for empty containers to be used to export non-consumable prescribed goods such as timber, an authorised officer must only inspect the container to ensure that there are no injurious 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 Regional Plant Export Program Manager for advice on the management of that container.

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The AO must be satisfied that there are no live injurious 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 quarantine pests of concern are included in Volume 6 Part A and Volume 6 Part B of Plant Export Operations Manual (PEOM).

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 product 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 filled with consumable plant product, 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 Container Approval Record must be completed detailing the reasons for rejection. 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 ECI3001 Inspection of empty containers.

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.

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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.

Cancel the container approval

An AO may cancel a container approval if they have reason to believe that the condition of the container has changed since the container approval was issued.

To cancel a container approval an AO must:

- Notify the client of the cancellation of the container approval.
- Complete a new Container Approval Record (PE104) noting in the remarks field the reason for cancellation
- 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 Container Approval Record will also become invalid.

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

Further Reading

Shipping Australia has prepared a publication 'Standards for Food Quality Shipping Containers' that is available at: <http://www.shippingaustralia.com.au/publications>

Relevant eLearning Module

- Introduction to Empty Container Inspections

Questions

- You can contact your Regional Plant Export Program Manager to clarify any aspects of this volume in the first instance.
- You can also direct a specific question or provide feedback to plantexporttraining@agriculture.gov.au

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