# Sea Container Hygiene System

Offshore Hygiene Requirements

Biosecurity Operations Division – August 2023

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**Acknowledgement of Country**

We acknowledge the Traditional Custodians of Australia and their continuing connection to land and sea, waters, environment and community. We pay our respects to the Traditional Custodians of the lands we live and work on, their culture, and their Elders past and present.

## 

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## Introduction

The following information may be used by entities or government to assist with the development of an offshore port hygiene system application. The information outlines procedures that can be implemented to meet SCHS minimum requirements, which are based on [International Standards for Phytosanitary Measures](https://www.ippc.int/en/core-activities/standards-setting/ispms/) (ISPMs) to meet IPPC/WTO and SPS agreements.

The purpose of this document is to provide a guide only. Further information or procedures may be required depending on the identified pest risks associated with a particular country or port. Entities can request further advice regarding site specific requirements or to request a scoping audit by emailing [SCHSCargoPolicy@aff.gov.au](mailto:schscargopolicy@aff.gov.au).

**Note:** Ports, facilities and shipping lines interested in applying for the system are referred to as an ‘entity’ in this document.

## Meeting Minimum Requirements

### Establishing the pest status of the hygiene system location

* + In order to establish the pest risk status of the country, port or facility, a pest survey may be required. Depending on the type of agreement, the [National Plant Protection Organisation](https://www.ippc.int/en/countries/all/list-countries/) (NPPO), a similar government organisation, or a biosecurity consultant may be required to conduct a pest survey.
  + Factors such as pest biology, size of the proposed area, pest population levels, ecological conditions, geographical isolation and historical data (if available) should be considered when conducting these surveys.
  + The department will need to be provided with documentation detailing the outcome of the pest survey, including all observations of pests and weeds. In the event of a pest status change, the department must be notified and documentation updated to reflect the change.
  + Implementation of an area free from pests and appropriate hygiene and surveillance measures as outlined in the [International Standards for Phytosanitary Measures](https://www.ippc.int/en/core-activities/standards-setting/ispms/) (ISPM No.4, 6 and 10) may be required.

### Appropriate infrastructure and facilities for offshore hygiene system activities

#### Facility condition

* + Containers must be cleaned within a designated cleaning area within the facility. This area must be maintained so it does not compromise any of the system’s processes.
  + This area is recommended to be an appropriate distance from the perimeter of the facility (distance to be determined by the entity based on pests and weeds risk) and the buffer zone should not have any vegetation or items that could encourage pest population growth.
  + The area should be concrete-based as dirt-based areas can cause soil contamination, encourage vegetation growth and/or increase pest activity.
  + Any potholes or cracks at the facility should be addressed to avoid splashback onto containers or creating a habitat for pests or weeds.

#### Facility Equipment

* + Designated areas are required to have adequate lighting if night time cleaning is undertaken. Lighting choices should not produce ultraviolet radiation or bluish tinge, or produce excessive heat, as these attract insects.
  + Container stands must be used to allow staff appropriate access to the base of containers, ensuring effective inspection and cleaning.

### Pest Management Plan

* + Regularly undertake appropriate chemical treatments around the system site to keep the area clean and free from pests.
  + Abide by health and safety requirements when undertaking chemical spraying and ensure that equipment is in good repair. Use the correct chemical dilution rates to ensure effective application and safety of use.
  + Conduct baiting and treatment activities when insects are most vulnerable (when they are larvae or eggs).
  + When developing a pest management plan for facilities/ports, consider the following:
  + weed treatment plans
  + general insect chemical treatments
  + ant and snail baiting treatments
  + vermin control and insect and traps as appropriate.
  + Maintain records of each chemical application/treatment in a logbook for auditing purposes.

**Note:** Chemical application should not be conducted during rainy or windy weather due to the impact on chemical effectiveness and the risk posed to the environment.

## Container cleaning and treatment process

The 2014 [IMO/ILO/UNECE Code of Practice for Packing of Cargo Transport Units](http://www.imo.org/en/ourwork/safety/cargoes/cargosecuring/pages/ctu-code.aspx) (CTU Code), which includes comprehensive information and references on all aspects of the loading and securing of cargo in containers. *Annex 6: Minimising the risk of recontamination*, is recommended to assist with management of the hygiene system.

The IPPC Sea Container Task Force also provides material aimed to facilitate and support the reduction of pest risks associated with the movement of sea containers: [Sea Containers page](https://www.ippc.int/en/core-activities/capacity-development/sea-containers/).

### Requirements for container cleaning and treatment

* + Ensure appropriate measures are taken to manage health and safety risks to staff conducting container cleaning and treatment.
  + Different container types require different treatments to ensure removal of all biosecurity risk material.
  + All system-involved parties engaged in the operation of the facility and movement of containers are responsible for the management and maintenance of container cleanliness.
  + When washing and treating containers which have been used to transport hazardous substances, check that the selected chemical treatments being applied will not react adversely with any substance residues and remain safe to use.
  + After containers are cleaned, ensure that the designated cleaning area is also cleaned to minimise the risk of cross-contamination.

### Disposal of materials

* + Any materials found on or in the container during the cleaning process should be removed in a safe manner and disposed of or destroyed accordingly.

### Containers being packed by shipper or consignee

* + Containers can be packed or consolidated by the shipping line after the container has been washed and treated at the offshore container hygiene system.
  + Containers which leave the approved system facility for packing will be considered non-system. To maintain system status, the container is required to return to the approved system facility and undergo a secondary inspection and cleaning. Following secondary inspection and/or treatment the container must be moved directly to the designated storage area at the wharf or loaded directly onto the outbound vessel.
  + If any previously sprayed areas require another wash, ensure they are then re-treated.

### Cleaning and treatment of empty and full container load (FCL)

* + Ensure all containers undergo 6-sided cleaning in the designated cleaning area. The container must be placed safely on a container stand before cleaning the underside.
  + Clean all external surfaces of the container with a high-pressure hose or water blaster, held 20 cm away from the container. If containers have been scraped to remove contaminants, they will still require washing to meet the hygiene requirements.
  + Pay attention to matter such as soil, animal and plant material such as insect nests, eggs, and seeds.
  + Extra attention needs to be given to high-risk areas such as door seals, cracks, twist locks, joints and the bottom of the container. The nozzle should be held 10cm away from high-risk areas.
  + Empty containers require cleaning of all internal surfaces. Containers may be swept to remove any contamination, however, washing may also be required where contaminants cannot be completely removed (e.g. embedded in cracks and joins)..
  + If contamination is found on the inside of the container, ensure that it is removed and disposed of accordingly.
  + Empty container doors should remain open during the internal cleaning process and closed prior to completion of external treatment application. Container doors should not be left open for an extended period, to avoid the potential for re-infestation.
  + Containers will require adequate drying time to reduce the risk of internal mould growth.
  + After cleaning, re-inspect the container to ensure contaminants have been removed from all surfaces before sealing the doors.
  + Check the water blasting has not moved contamination into other areas, particularly into the container.
  + If the container is free from contamination, apply a hygiene system sticker to identify completion of the container washing process.
  + When cleaning containers:
  + Individual ants can be removed from containers by sweeping, however if a colony or infestation is found, it should be sprayed immediately with an appropriate chemical treatment, before being removed and disposed of.
  + Any snails and eggs found need to be immediately treated and removed.

### Container Treatment

* + Staff engaging with chemical treatments must have appropriate training in the use of safety equipment and required Personal Protective Equipment (PPE).
  + Ensure containers are washed and relatively dry prior to chemical treatment. Chemical treatments should not be applied during wet or windy weather conditions.
  + Apply barrier (residual) treatments to containers within a reasonable time after completing the washing process.
  + After treatment of container, seal the container, apply a system sticker and record the treatment details. When treating containers, consider the following:
  + Insecticides to control ants and general insects should be applied using a sprayer.
  + Apply a minimum of 30cm treatment spray band around the base of the container, doors, door seals, fork-lift tine holes and twist locks.
  + FCLs require complete underside treatment.
  + This application should be repeated to ensure that the treatment remains effective.

**Note:** Due to the high mobility of ants during transit, an ant chemical treatment must be applied to ALL hygiene system containers and facilities. If chemical treatment cannot be applied due to heavy rain or winds it is considered non-system.

### Cleaning and treatment of other container types

Containers that do not fall into the regular container dimensions may require unique cleaning and treatment methods to meet hygiene system requirements. Please refer to below for the appropriate treatment. The chemical treatment required should reflect the biosecurity risk of the country/port or facility and results of the pest survey/pest status.

#### Refrigerated (Reefer) containers

* + Undertake normal FCL container cleaning and treatment. Pay extra attention to washing the refrigerator motor bay as contaminants can be lodged here. This area will also require chemical treatment.
  + If reefers are empty, ensure that the internal sides are cleaned according to the empty container procedure.
  + The normal procedures of spraying containers are used for reefers. Pay extra attention to spraying the refrigerator section on the back of the container. Application should be repeated to ensure the treatment remains effective.

#### Flat racks

* + Only empty flat racks are in scope, full flat racks may still be cleaned and treated but will be considered non-system due to the cargo risk.
  + All external surfaces of a flat rack container must be washed.
  + Ensure that the container has been placed safely on a container stand before the base is washed.
  + Treatment should be applied in a similar manner to FCL, however it only needs to be applied around the skirt of the container and on the base. The treatment process should be repeated to ensure treatment remains effective.
  + If the flat rack has solid walls, the treatment needs to be applied to these sides. Pay extra attention to the extra rails on the base side of containers and where the frames join.

#### Tanktainers

* + Check tanktainer contents to ensure that they do not react to water or chemical treatments.
  + Wash all external sides of the tanktainer.
  + Apply chemical treatment to the base of the tanktainer and internally where the frames join.

#### Hazardous goods

* + Ensure that the goods inside the container will not react to water, or any chemical treatments used.
  + An alternative cleaning method should be used for containers with hazardous goods.

## Adequate processes to segregate and store system containers

* + Containers that have been washed, treated, sealed and stickered must be stored in a designated system storage area.
  + This storage area should preferably be a concrete or paved surface to minimise the risk of recontamination with soil or pests. Where this is not possible, measures should be taken to ensure the bottom of the containers are not in direct contact with the ground. The storage area must also be free from vegetation and pests.
  + Baiting activities are required be conducted on a regular basis to ensure the area remains pest-free.
  + Record all baiting and treatment activities conducted in a logbook.
  + Unwashed containers are not to be stored in the same area as cleaned containers. The system storage area should have a buffer of appropriate distance, based on pest populations and environmental factors, from non-system containers.
  + Washed containers may be kept in the same area as chemically treated containers.
  + Containers are to be stacked no higher than safely recommended.
  + Containers that have remained on site for a period that exceeds the effectiveness date of the chemical treatment will need to be re-inspected, re-washed and re-treated.

## Pre-Load Checks

* + Any containers that have stickers reflecting the potential of surpassing the treatment effectiveness date before the containers are imported into Australia will need to be re-treated prior to loading.
  + Sticker information should be updated if re-washing or re-treatment is undertaken.
  + Containers should undergo a final quality check to ensure that no contaminants or infestations are present on container prior to loading. If contaminants or infestations are detected the container must be re-treated.

## Documentation and auditing

### Audit requirements

* + Internal audits are to be conducted annually to ensure the hygiene system processes are followed correctly and the site is of a standard that will not compromise the effectiveness of the system.
  + External audits will be conducted by the department on an annual basis and may be required more frequently should there be changes to the compliance level of the facility.

### Documents

* + Regularly update training guides and registers with information on training days and assessments.
  + Keep chemical logs for treatment of containers as well as any baiting and/or trapping activities for the hygiene system area and the designated system storage area at the wharf.
  + Maintain hygiene checklists relating to all areas of the system.
  + Maintain procedures for notifying stevedores/shippers of hygiene system containers for vessel loading.
  + Document and maintain Standard Operating Procedure (SOP)/Code of Practice (COP).
  + Note: This information is required to be presented to auditors to verify that appropriate training and activities are being conducted to ensure the efficacy of the system.