Australian Government

Department of Agriculture, Fisheries and Forestry

WORK INSTRUCTION

Inspecting 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.

Summary of main points

This document outlines:

- pre-inspection tasks
- empty container inspection and reinspection tasks
- procedures for passing and failing empty container
- procedures for issuing or revoking container approval.

_____

In this document

This document contains the following topics.

This is a CONTROLLED document. Any documents appearing in paper form are not controlled and should be checked against the IML version prior to use.

Inspecting empty containers for export   Version no.: 3

Date published: 24/11/2023   2 of 9

Purpose of this document

This document details the procedure for inspecting and approving empty containers for loading of prescribed goods for export.

Policy statement

AOs must read and comply with the policy and process related to this work instruction contained in the Guideline: *Inspection of empty containers for export*.

Legislative framework

The legislation that applies to the inspection of empty bulk vessels for export can be found in the Guideline: *Inspection of empty containers for export*.

Roles and responsibilities

The following table outlines the roles and responsibilities undertaken in this work instruction.

Role	Responsibility
Inspection authorised officer (AO)	• Inspect empty container to be loaded with prescribed goods for export. • Validate inspection supporting documents. • Record and submit the results of the inspection. • Pass and fail the containers following inspection. • Issue an invoice for inspection services (departmental AO only). • Issue, withhold, suspend and revoke container approval.

Work health and safety

Inspection AOs must:

- read and be familiar with the Reference: *Work health and safety in the plant export environment*.
- comply with applicable Commonwealth, State and Territory WHS legislation
- comply with their employer's WHS policies and procedures
- 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
-

Personal protective equipment

Inspection AOs must wear the following PPE for empty container inspection:

- hi-visibility vest
- safety boots
- gloves
- hard hat

This is a CONTROLLED document. Any documents appearing in paper form are not controlled and should be checked against the IML version prior to use.

Inspecting empty containers for export
Date published: 24/11/2023

Version no.: 3
3 of 9

Inspection AOs must have the following PPE with them and use when required:

- first aid kit
- water
- sunscreen
- appropriate emergency communication equipment such as a phone carrier with coverage or satellite phone.

An AO must wear the following PPE where required by the work site or where they have identified a risk in the work environment:

- long sleeve clothing
- steel cap boots
- hearing protection
- face mask
- portable gas detector.

Refer to Reference: *Work health and safety in the plant export environment* for more details.

Essential equipment

AOs must have the following inspection equipment:

- 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
- clean sieve/s (large and pocket)
- hand lens x10 magnification for pest identification
- pests of quarantine concern and pest identification information
- specimen jars to store pests found during inspection
- tamper-evident seals
- Passed Empty Container stickers.

System requirements

AOs must have access to the following systems:

- the department's website
- Plant Exports Management System (PEMS)
- Electronic Export Documentation System (EXDOC) (for departmental AOs only).

Conduct pre-inspection tasks

- Receive a request for an inspection of an empty container.
- Check that you have received all supporting documents required prior to inspection as per the Reference: *Plant export documents and treatments checklists*.
  - o If all the supporting documents have not been received, you cannot continue with the inspection.
  - o Advise the client that they need to obtain the supporting documents before the container can be inspected.

- Check that the supporting documents you have received are valid as per the Guideline: *Supporting documents for plant exports*.
  - If any of the supporting documents are not valid you cannot continue with the inspection.
  - Advise the client that they need to obtain valid supporting documents before the container can be inspected.
- Ensure the facility where the inspection is to be conducted has adequate lighting and space to safely carry out the inspection and certification tasks.
- Ensure the person responsible for the container is available to assist and provide equipment if necessary.
- Before commencing the inspection, the AO must have
  - access to PEMS or a manual inspection record
  - inspection equipment that is fit for purpose
  - relevant instructional or reference material
- Check site specific WH&S requirements and utilise your personal protective equipment.

Conduct container inspection tasks

Procedure

- Inspect the container by conducting an external inspection and an internal inspection using suitable equipment.
- Inspect a container to be loaded with **non-consumable** goods for
  - live insect pests in residues
  - live insect pests on the structure of the container
  - live pests and vermin
  - any residue infestible by insects
  - excessive soil residues
  - structural damage such that insects could enter after loading.
- Inspect a container to be loaded with **consumable** goods for
  - 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 including but not limited to soil, odours, moisture,
  - transferable oil residues and flaking rust/paint
  - vermin carcasses and/or their waste.

External Inspection

- Record the container number on the inspection record.
- Inspect the exterior of the container
  - doorways
  - corner castings
  - discharge chutes
  - roof hatches (if present and safe to access)
  - fumigation nipples

- o tyne pockets/forklift holes
- o doors, locking cams, door locks
- o areas around door seal.
- Ensure the doors can be sealed properly.

Internal Inspection

- Open the doors slightly at first and step back to ensure
  - o no harmful odours are present
  - o the presence of any potential pests can be contained by immediately closing the doors.
- Once you are satisfied that no harmful odours or potential pests are present, open the container doors fully and walk to the far end of the container.
- Perform a light check with another person
  - o ask another person to stay by the door and to open it when requested
  - o have the assistant close the doors of the container completely, ensuring the closing mechanism is fully engaged
  - o check to ensure there is no external light visible from inside the container
  - o this process should take no longer than 30 seconds.
- With the doors open inspect the interior of the container
  - o ceiling
  - o walls
  - o flooring
  - o horizontal ledges
  - o ceiling angles
  - o any side panelling
  - o ventilation grills
  - o lashing rings
  - o wooden linings.

Bulk Heads, Liners and Non-transparent lamination

- Inspect any bulkheads or liners before they are fitted.
- Inspect containers installed with non-transparent materials before and after lamination is applied.
- Both inspections must be conducted by the same AO at the same site.
- Conduct the inspection of containers with internal non-transparent lamination installed according to the procedure stated above.

Transparent lamination

- Transparent lamination material can be applied to the inside of the container prior to inspection of the empty container.
- Conduct the inspection of containers with internal transparent lamination installed according to the procedure stated above.

Pass the container

- Pass the container if you are satisfied that all relevant inspection levels have been met.
- Record passed container on the inspection record.

This is a CONTROLLED document. Any documents appearing in paper form are not controlled and should be checked against the IML version prior to use.

Inspecting empty containers for export
Date published: 24/11/2023

Version no.: 3
6 of 9

- Apply a completed Passed Empty Container sticker after you have completed the inspection if the container is not being loaded immediately in the presence of the AO or is being transported to a different location.
- A tamper-evident seal must be applied if
  o the container is not to be loaded immediately in the presence of the AO
  o the container is to be transported elsewhere.
- The 90-day approval period starts when the container is passed.
- Issue client a **copy** of the completed inspection record, if requested.
- If the inspection has not been recorded in PEMS, send the department a **copy** of the completed inspection record and any supporting documentation.
- If the inspection has not been recorded in PEMS, retain the **original** completed manual inspection record and any supporting documentation for auditing purposes for a period of 2 years.

Reject the container

- Reject the container based on the relevant inspection type.
- Record rejection of container on the inspection record.
  o Container to be loaded with non-consumable goods
    - **LI -** Live insects in residues or on the structure of the container, inside or out
    - **LR -** Live rodents or evidence of rodent harbouring behind linings
    - **IR -** Infestible residue
    - **SD -** Structural damage such that insects could enter after loading.
  o Container to be loaded with consumable goods
    - **LI -** Live insects in residues or on the structure of the container, inside or out
    - **LR** - Live rodents or evidence of rodent harbouring behind linings
    - **IR -** Infestible residue
    - **SD -** Structural damage such that insects could enter after loading
    - **NI -** Non-infestible material.
- For the detection of any **pests of quarantine concern** (Refer to the Reference: *Pests and contaminants of grain and plant products*) you must reject the container and also contact the "See. Secure. Report" hotline: 1800 798 636.
- For the detection of any contaminants in containers to be loaded with non-consumable goods you should alert the client as they may wish to replace the container.
- Issue client a **copy** of the completed inspection record, if requested.
- If the inspection has not been recorded in PEMS, send the department a **copy** of the completed inspection record and any supporting documentation.
- If the inspection has not been recorded in PEMS, retain the **original** completed manual inspection record and any supporting documentation for auditing purposes for a period of 2 years.

Reinspect the resubmitted container

Containers rejected for *Trogoderma* spp. insect infestations

- Containers rejected for *Trogoderma* spp. insect infestations must be treated with a fumigant prior to reinspection.

This is a CONTROLLED document. Any documents appearing in paper form are not controlled and should be checked against the IML version prior to use.

Inspecting empty containers for export   Version no.: 3
Date published: 24/11/2023   7 of 9

- Do not **recommend** any particular fumigant as the choice of treatment is the responsibility of the client.
- Before the reinspection commences you must check what supporting documents are required as per the Reference: *Plant export documents and treatments checklists.*
  - If all the supporting documents have not been received you cannot continue with the reinspection.
  - Advise the client that they need to obtain the supporting documents before the container can be reinspected.
- Check that the supporting documents you have received are valid as per the Guideline: *Supporting documents for plant exports.*
  - If any of the supporting documents are not valid you cannot continue with the reinspection.
  - Advise the client that they need to obtain valid supporting documents before the container can be reinspected.
- Reinspect the resubmitted container by following the instructions for
  - Conduct pre-inspection tasks
  - Conduct container inspection tasks
  - Pass the container
  - Reject the container.

Revoke the container approval

- You may revoke a container approval if
  - you believe the condition of the container has changed since the container approval was issued and it is no longer appropriate for the container to be loaded with product
  - the container displays a Passed Empty Container sticker whose validity period has expired (90 days).
- To revoke a container approval you must
  - notify the client in writing of the revocation of the container approval and reasons for the revocation
  - complete a new inspection record noting in the remarks field the reason for revocation or revoke the container in PEMS (see Reference: *Plant Export Management System authorised officer user guide*)
  - remove and destroy the Passed Empty Container sticker if applicable.
- The original completed inspection record will also become invalid.

The container that has either a revoked or invalid container approval will require a new container inspection.

Record keeping

Where documents are not available in PEMS, clients, exporters, the occupiers of 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 2 years.

Related material

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

- Plant Export Operations Manual
  - Guideline: *Inspection of empty containers for export*

- o Guideline: *Supporting documents for plant exports*
- o Reference: *Pests, diseases and contaminants of grain and plant products*
- o Reference: *Plant Export Management System authorised officer user guide - Empty container inspections*
- o Reference: *Empty container inspection record*
- o Reference: *Plant export document and treatments checklist*
- o Reference: *Work health and safety in the plant export environment.*

Contact information

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

Document information

The following table contains administrative metadata.

Instructional Material Library document ID	Instructional material owner
IMLS-9-7680	Director, Grain and Seed Exports

Version history

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

Version	Date	Amendment details
1.0	28/03/2021	First publication of this work instruction for commencement of the *Export Control Act 2020* and associated Plant Rules.
2.0	9/05/2022	Amended requirements regarding the application of Passed Empty Container stickers.
3	24/11/2023	Updated department branding, email addresses and the references related to registered establishments to ensure clarity of the content and to prevent mis intended interpretation.

This is a CONTROLLED document. Any documents appearing in paper form are not controlled and should be checked against the IML version prior to use.

Inspecting empty containers for export
Date published: 24/11/2023

Version no.: 3
9 of 9