Work Instruction

Inspection of empty containers
ECI3001
CONTENTS

1. WORK EFFECTIVELY IN AN EXPORT ENVIRONMENT ........................................ 3
   1.1 Purpose ........................................................................................................... 3
   1.2 Containers ..................................................................................................... 3
   1.3 Work Health and Safety .................................................................................. 3

2. CONDUCT PRE-INSPECTION TASKS ................................................................. 4

3. CONDUCT CONTAINER INSPECTION TASKS ................................................. 4

4. PASS THE CONTAINER ...................................................................................... 6

5. REJECT THE CONTAINER ................................................................................ 7

6. REINSPECT THE RESUBMITTED CONTAINER .............................................. 8

7. CANCEL THE CONTAINER APPROVAL ........................................................... 8
1. Work effectively in an export environment

1.1 Purpose

This work instruction relates to the export inspection of empty containers to be loaded with prescribed goods for government certification purposes and applies to Authorised Officers (AO).

In this work instruction, ‘client’ means the exporter, exporter’s representative or person responsible for the empty container.

The Plant Export Operations Manual (PEOM) provides additional details including the reasons for doing certain tasks and supporting information and directions approved by the Secretary or Secretary’s delegate.

For guidance on issues that are not covered by this work instruction or the PEOM you must refer to the Department of Agriculture Regional Plant Export Manager in your local area.

AOs must follow and comply with export legislation and the APS Code of Conduct and Values at all times. Communication, conflict management and defensible decision-making are integral to the role of an AO.

1.2 Containers

The containers covered include empty shipping containers.

1.3 Work health and safety

Work sites must not be entered unless it is safe, relevant personal protective Equipment is available and Work Health and Safety (WH&S) hazards have been considered.

All sites are different and AOs must comply with Department WH&S policies and relevant national, state and/or territory WH&S policies.

On entering a site AOs must report to the site office and/or a responsible person and inform them of your attendance on the site and complete any induction procedures.

Refer to Volume 16 in the PEOM for more details.
2. **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*.
  - If all the supporting documents have not been received you cannot continue with the inspection.
  - 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 Work Instruction: *Validating 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 is adequate.

- Ensure the person responsible for the container is available to assist and provide equipment if necessary.

- Before commencing the inspection the AO must have:
  - a Container Approval Record (PE104)
  - inspection equipment that is fit for purpose
  - relevant instructional or reference material

- Check site specific WH&S requirements and utilise your personal protective equipment.

3. **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
o excessive soil residues
o 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 Container Approval Record
- Inspect the exterior of the container:
  - doorways
  - corner castings
  - discharge chutes
  - roof hatches (if present and safe to access)
  - fumigation nipples
  - tyne pockets/forklift holes
  - doors, locking cams, door locks
  - areas around door seal
- Ensure the doors can be sealed properly

**Internal Inspection**
- Open the doors slightly at first and step back to ensure:
  - no harmful odours are present
  - 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
  - Ask another person to stay by the door and to open it when requested
Have the assistant close the doors of the container completely, ensuring the closing mechanism is fully engaged.

- Check to ensure there is no external light visible from inside the container
- This process should take no longer than 30 seconds

- With the doors open inspect the interior of the container:
  - ceiling
  - walls
  - flooring
  - horizontal ledges
  - ceiling angles
  - any side panelling
  - ventilation grills
  - lashing rings
  - 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.

**4. Pass the container**

- Pass the container if you are satisfied that all relevant inspection levels have been met
- Record passed container on Container Approval Record
• Apply a completed Passed Empty Container sticker immediately after you have completed the inspection
• 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 days compliance period starts when the container is passed as export compliant.
• Issue client a copy of the completed Container Approval Record
• Send the Department a copy of completed Container Approval Record and any supporting documentation
• Retain the original completed Container Approval Record and any supporting documentation for auditing purposes for a period of two (2) years

5. Reject the container

• Reject the container based on the relevant inspection type
• Record rejection of container on Container Approval 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 PEOM Volume 11 for details of pests of quarantine concern) you must reject the container and also advise your local DAFF office.

• 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
6. **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.
  - 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: *PEOB 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 Work Instruction: *Validating 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

7. **Cancel the container approval**

- You may cancel a container approval if:
○ you believe the condition of the container has changed since the container approval was issued

○ the container displays a Passed Empty Container sticker whose validity period has expired (90 days)

- To cancel a container approval you must:
  ○ notify the client of the cancellation of the container approval
  ○ complete a new Container Approval Record noting in the remarks field the reason for cancellation
  ○ remove and destroy the Passed Empty Container sticker if applicable

- The original completed Container Approval Record will also become invalid

- The container that has either a cancelled or invalid container approval will require a new container inspection