STANDARDS FOR EMPTY SHIPPING CONTAINER INSPECTION

VERSION 2 - May 2021

Shipping Australia Limited

Australian Government
Department of Agriculture, Water and the Environment

Grain Trade Australia

TO SUPPORT THE INSPECTION OF EMPTY CONTAINERS BY INDUSTRY AND THE AUSTRALIAN GOVERNMENT DEPARTMENT OF AGRICULTURE, WATER & THE ENVIRONMENT FOR EXPORT OF AUSTRALIAN GOODS

This booklet has been produced as a joint project by Shipping Australia Limited (SAL), Australian Government Department of Agriculture Water & the Environment (DAWE) and Grain Trade Australia (GTA) on behalf of grain container packers and exporters, shipowners, container park operators, and others with an interest or involvement in food quality, general purpose or scrap cargo containers.

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1 Introduction

This Standard is an update of the 2012 Shipping Australia Limited Standards for Food Quality Shipping Containers and is provided as an adjunct and a guide to the Department of Agriculture Water & the Environment (DAWE) Plant Export Operations Manual Volume 11. DAWE's Volume 11 relates to the inspection of empty shipping containers (containers) to be used for the export of prescribed goods.

DAWE Volume 11 and this Standard share the same objective:

"The aim of an empty container inspection is to ensure that the container condition supports the DAWE 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."

Prepared through a joint shipping and grain industry approach and supported by DAWE this Standard has been developed as a general reference for all those involved in the supply, preparation and inspection of dry containers for the carriage for export of prescribed goods. Its purpose is to offer simple descriptions and supporting visual guidance of the DAWE Plant Export Operations Manual Volume 11.

This digital booklet explains container standards, container assessment procedures and outlines steps to clean and repair non-structural defects. It is anticipated this Standard will support the process of inspection and preparation of containers and will minimise any confusion, reduce unnecessary cost and delays in preparing containers given this is ultimately detrimental to exporters, shipowners and the competitiveness of the industry.

Users of this Standard should also be fully aware of any specific shipper or client requirements, ISO Standards, and all of the requirements for 'Safe Containers' outlined in Marine Order 44. Legislated standards for safe containers will be referred to where instructive, however the **focus of this Standard is to address the more specific requirement of preparing 'food grade compatible' containers and 'DAWE certified' containers**.

The Standard provides pictorial examples to illustrate the acceptable standards of the relevant container category. The photographs have been arranged in such a manner as to illustrate what is acceptable and what is not acceptable. There are also descriptions of what remedial action is required to bring an unacceptable container to acceptance levels in specific areas. These are suggested actions and it is recognised that other methods may be equally effective.

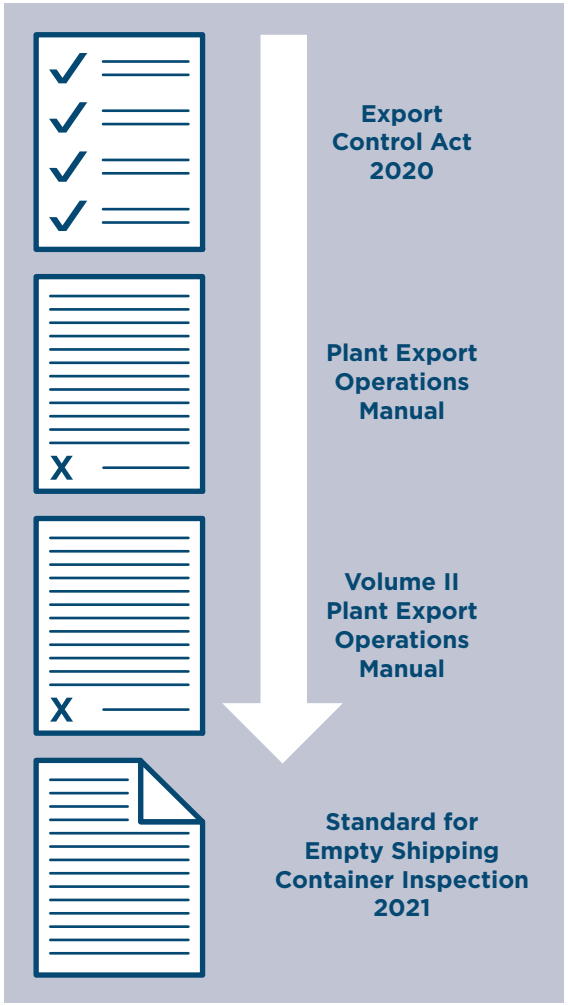
Users of this Standard should be aware this digital booklet is a 'live' industry tool and will be updated on a regular basis by the joint DAWE and shipping and grain industry group to reflect modern operational practices in container cleaning and repair standards and when changes are made to the standard of acceptance for food quality containers. Resource material and in particular photographs are welcomed from users of this Standard to ensure it continues to provide a service to participants within the container supply chain.

This publication will be updated from time to time to reflect modern operational practices in container cleaning and repair standards and if changes are made to the standard of acceptance for food quality containers.

2 Legislative Framework

The current legislative framework that this booklet has been prepared and aligned to is the framework that dictates the requirements for 'DAWE certified' containers.This is:

Figure 1. Legislative Framework of Standard for Empty Shipping Container Inspection 2021



Under the Export Control Act 2020 containers require inspection and approval if:

(i) The country of destination requires a Phytosanitary Certificate; or

(ii) The cargo concerned is a prescribed good listed under the Export Control Orders 2005.

A Phytosanitary Certificate is a Government-to-Government document that certifies plants or plant products are delivered free from infestation, container cleanliness is therefore an integral part of the certification process. It is issued in accordance with Australia's obligations as a signatory to the International Plant Protection Convention. Under this convention, to date 177 countries have established their phytosanitary requirements for importing plant commodities and if they are not met, problems may result, causing countries to ban Australian goods or impose other conditions or restrictions.

To avoid these problems containers are inspected to ensure freedom from pests, infestible residues and from any conditions that would allow cross-infestation or cross-infection to occur. Further inspection for food quality containers is also required to ensure that no contaminates (non-infestible residues) are present.

2.1 Approved Arrangements

Container inspections and DAWE certification can be performed by parties other than DAWE personnel. Companies can establish procedures based on DAWE instructional materials outlined by DAWE that enable them to undertake part or full responsibility for meeting export commodities phytosanitary requirements. Part responsibility can include the certification of shipping containers' compliance with DAWE export standards. To enable a company employee to inspect and certify containers DAWE provides specific training for individuals to be accredited as Authorised Officers.

The company gives DAWE specific assurances that procedures are implemented that ensure phytosanitary outcomes are achieved. The procedures need to be approved by DAWE and are auditable.

3 The Standards Explained

The Standards outlined in this document refer to the standard to be met for containers to be loaded with different goods:

- Depending on the commodity to be loaded, a different standard of container is required from a regulatory viewpoint.
- Industry may also require a different standard of container, depending on contractual requirements.

Shippers exporting goods should use the appropriate standard of container based on their market requirements. Exporting commodities in containers of higher standard than is necessary is an inefficient use of resources as it reduces availability of containers and leads to significantly higher costs to industry.

3.1 DAWE Certified Container

A DAWE Certified container is one in which grain and other consumable prescribed goods can be loaded for export. This is a mandated standard of container cleanliness required for exporting prescribed goods from Australia.

The container has been inspected and certified as a DAWE Certified container by an authorised representative of DAWE (an Authorised Officer). For these containers in all situations:

- No strong odours, no flaking paint or rust, no transferable stains or rust and no infestible material must be present on the inside of the container;
- Containers are used for the export of Prescribed goods that are consumable (edible) plant products such as grain (cereals, pulses, oilseeds) and hay/straw.

Note: For the purposes of this document relating to the procedure for inspection of empty containers as outlined in Section 5, procedures as described will be to meet the DAWE Certified Container Standard, without the requirement for an AO inspection and approval process.

3.2 Food Grade Compatible

A Food Grade Compatible container is one in which the container meets all the requirements of being a DAWE Certified Container except it has not been certified as such by an authorised representative of the DAWE (an Authorised Officer). For clarity, if an Authorised Officer (AO) conducted the inspection, the container could be classified as a DAWE Certified Container.

3 The Standards Explained (cont)

3.3 General Purpose

A General-Purpose container is one that does not meet the requirements of a Food Grade Compatible container. These containers:

- Are in a lesser structural condition than a Food Grade Compatible container.
- Generally, are not able to be upgraded to the condition of a Food Grade Compatible container or may be able to with extensive and often expensive re-work.
- Generally, have a clean and dry floor, contain no prior cargo residue and do not contain any insect infestation.
- Are generally used for Prescribed goods that are non-consumable (non-edible) plant products such as logs, wood chips and cotton lint.
- Are not required to be permitted or approved by AOs for loading of consumable goods for export.

3.4 Flexi Tank

A flexi tank container is compliant with Container Owners Association Code of Practice. They are used to transport non-hazardous liquid cargo such as wine, fruit juice and vegetable oil.

3.5 Scrap Cargo

A Scrap Cargo container is generally regarded as a container that:

- Is fit for purpose but is cargo worthy.
- Has no structural weakness.
- Contains some damage such as normal wear & tear to a level that is acceptable e.g., interior panels have heavy abrasions and / or rust.
- Are used to transport non-Prescribed goods such as steel products, scrap metal and hides (not requiring phytosanitary certification).

3 The Standards Explained (cont)

3.6 Summary of Container Categories

The following table summarises container categories:

GRADE	Commodity Description	Container Criteria	Commodity Examples
DAWE Certified container	Prescribed goods: **Consumable** (edible) plant products	• No obnoxious odours • No flaking paint or rust • No transferable stains or rust • No infestible material • No live insect pests or vermin	• Grain • Mung beans • Rice • Hay and straw
	Prescribed goods: **Non-consumable** (non-edible) plant products when a Phytosanitary Certificate **is required**	• Clean and dry floor • No prior cargo residue • No live pests • No rodent or other carcases	• Timber & timber products • Cotton lint
Food Grade Compatible	As per DAWE Certified Consumable except not certified by AO		
General Purpose	Any goods where a Phytosanitary Certificate **is NOT required**	• Clean and dry floor • No prior cargo residue • No injurious pests	• Timber & timber products • Cotton lint
Flexi tank	Non-hazardous liquid cargo	• Compliant with Container Owners Association Code of Practice	• Wine • Fruit juice • Vegetable oil
Scrap Cargo	Cargo not requiring phytosanitary certification	• Fit for purpose - Cargo worthy • No structural weakness. • Normal wear & tear - acceptable • Interior panels with heavy abrasions/rust acceptable	• Steel products • Scrap metal • Hides

3.7 Container Inspection Myths

The following are some of the myths and suppositions in relation to containers. These should be completely disregarded as they **are not correct**:

- Odours remain in containers and nothing will eradicate them.
- Plank floors are unsuitable for food quality containers.
- Only specific brands or colours of paint are acceptable.
- When flaky paint is removed the surface must be repainted.
- Long trips by road and rail downgrade the containers.
- Every shipper and packer have a different container Standard.
- Liners are not acceptable in certain overseas countries.

4 Definitions & Abbreviations

The following definitions and abbreviations apply to references in this document in reference to containers.

Authorised Officer	Person approved by the DAWE to inspect and certify a container as being a DAWE Certified Standard.
AQIS	**AQIS is a prior anachronism** of the government agency (Australian Quarantine and Inspection Services) that is now DAWE. This term survives and is still referred to when referring to certified containers; i.e. AQIS inspected.
Bulkhead	Material used to seal the door area of a container, in order to prevent spillage of the cargo.
Container	A shipping container is a steel container used for intermodal shipment of a range of goods.
Container Packing Facility	A facility where a container is packed with Prescribed Goods for export.
Container Park	A facility used to store, maintain and supply containers of various standards to industry for loading of goods for export.
Contaminant	Organic or inorganic material that is not of the commodity being loaded into a container. Includes all insects.
CSC	Convention for Safe Containers (CSC) is an international agreement dating to the 1972 International Convention for Safe Containers. CSC sets international standards in design-type approval and safety inspections so that containers operate globally under one set of safety regulations.
Department of (DAWE)	Department of Agriculture Water & the Environment, an Australian Government department responsible for certification of empty containers to be loaded with goods for export.
DPI (Inspection)	DPI is a prior anachronism of the government agency (Department of Primary Industry) that is now DAWE. This term survives and is still referred to when referring to certified containers; i.e. DPI inspected.
Empty Container Park (ECP)	Refer to Container Park.
Food Grade Compatible	General term used for the standard of a container that other than inspection by a DAWE AO, would meet that Standard.
Food Grade Container	Refer to Food Grade Compatible.
Infestible Material	Organic material that can be infested with live pests.
Insects	In the context of this Standard, refers to Live Pests.
ISO	International Standardization Organization (ISO) based in Geneva that works towards harmonising worldwide technical standards including those governing the construction of shipping containers.
Live Pests	Nil tolerance for any live pests in all DAWE Certified Containers.
Liner	Material used to line the interior of a container to assist in separation of the cargo to be loaded and the internal structure of the container.
Mould	Fungus that grows on structures and produces moisture and potentially odour.

4 Definitions & Abbreviations (cont)

Non-Transferable Stain	A stain on the inside of a container that cannot be rubbed off and therefore will not transfer to the cargo loaded into that container.
Odour	A distinctive smell that has the potential to negatively impact on the quality of the cargo to be loaded. The odour is not normally associated with the container.
Pests of Quarantine Concern	In relation to exports, is an object of quarantine not permitted to be present in a container of cargo destined for a particular export market. If the pest is suspected of being a National priority plant pest it should be reported to DAWE on the "See. Secure. Report." hotline 1800 798 636. Instructional material has been prepared by DAWE and published in the Plant Export Operations Manual to provide information that directs and supports industry and AOs to understand pests of quarantine concern in relation to empty container inspection for subsequent export of plants and plant products from Australia. *Pests and contaminants of grain and plant products* contains information on pests of quarantine concern that is relevant to both the grain industry and AOs. Includes stored grain insects, field insects, rodents, sand/soil/earth.
Prescribed Goods	Prescribed grains and goods that require phytosanitary certification.
Quarantine Goods	Goods whose movement and condition is controlled under relevant legislation and managed by DAWE.
Rejection	In the context of this Standard, failure of a container to meet the relevant Standard.
Residue	Refer to Contaminant.
Rust	The corrosion of iron, occurs in the presence of moisture and is typically orange in colour.
TIR	Transports International Routiers (TIR). An international harmonized system of Customs control that facilitates trade and transport whilst effectively protecting the revenue of each Country through which goods are carried. In order for containers to be able to transport goods under custom seal they need to meet TIR requirements.
Transferable Stain	A stain on the inside of a container that can be readily rubbed off and therefore would be expected to transfer to the cargo loaded into that container.

5 Container Assessment Procedure

In this section, all procedures described are required to be followed to determine if an empty container meets the DAWE Certified Container Standard, without the requirement for an AO inspection and approval process.

5.1 Summary of Assessment Process

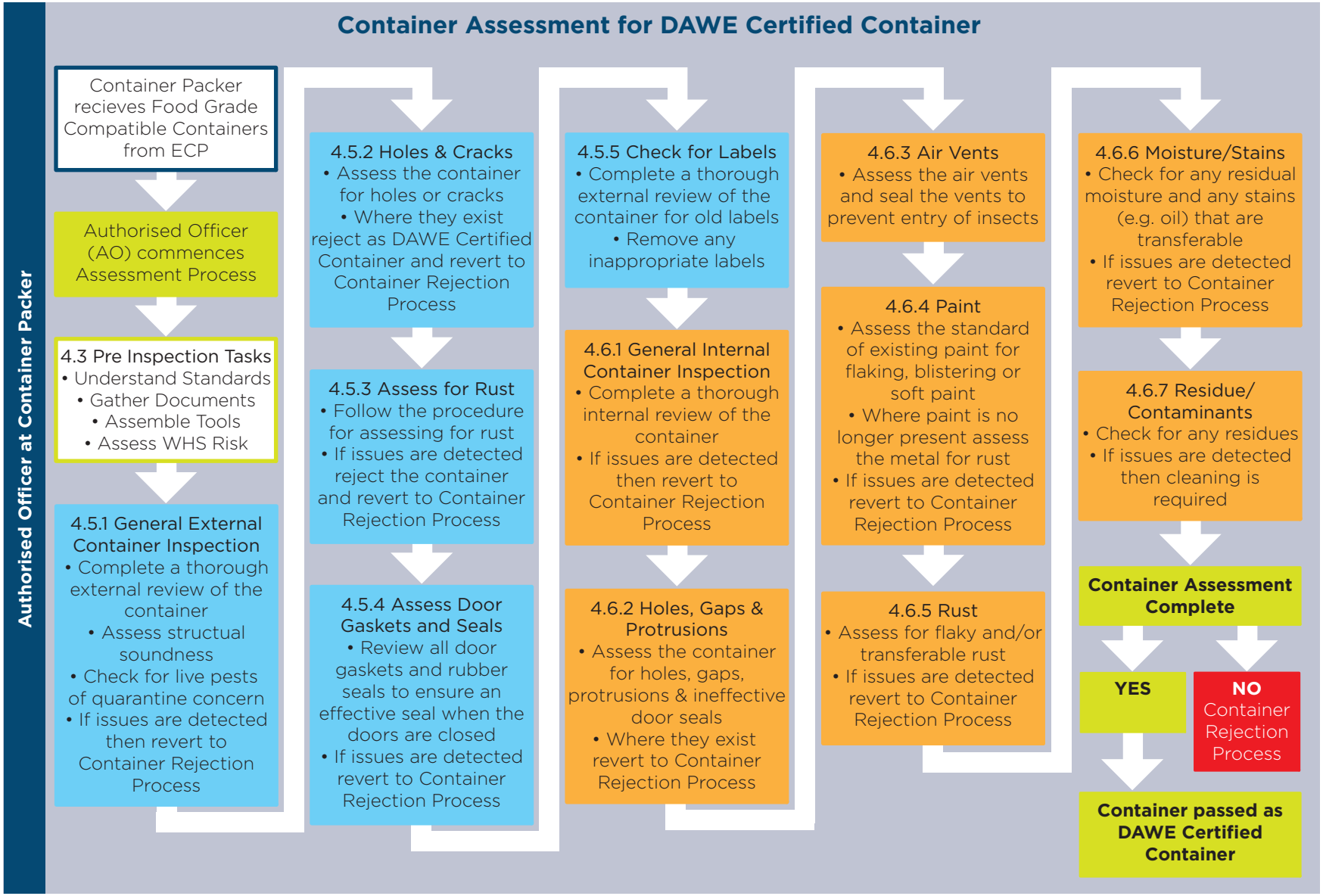
The Assessment Process for DAWE Certified Containers is described in detail in the Process Map included in Section 5.2.

A general summary of the process is:

PROCESS	DESCRIPTION
Preparation	• Understand the Standards and the process. • Gather required Tools & documents. • Consider WH&S risk.
External Inspection Container	• Review external area for structural soundness, holes and cracks and freedom from insects. • Check for any rust and assess if the door seals and gaskets are serviceable. • Check and remove any inappropriate labels.
Internal Container Inspection	• Check for holes, gaps & protrusions. • Assess and seal air vents. • Check for any transferable rust. • Check for residual moisture and any transferrable stains. • Assess the container for residual cargo, contaminants and freedom from pests.

5 Container Assessment Procedure (cont)

5.2 Process Map



5 Container Assessment Procedure (cont)

5.3 Pre-Inspection Tasks

Each company involved in the preparation and inspection of containers to be used for the export of Prescribed Goods should be aware of the following prior to commencing the assessment process:

- This Standard for Empty Shipping Container Inspection);
- Any specific shipper or client requirements; and
- All of the requirements for 'Safe Containers' outlined in Marine Order 44.

Legislated standards as described in Section 2. may also be referred to where instructive, however this Standard is to address the more specific requirement of preparing 'food grade compatible' containers and 'DAWE certified' containers.

Users of this Standard should be aware, and where required comply with the Australian Grain Industry Code of Practice and Technical Guideline Document number 17 - Container Packer Operations Manual.

This Standard may be used to form the basis of an individual company inspection process that must be documented, and results recorded in an inspection sheet or similar reporting format.

Assessors should be provided with any relevant inspection procedure documents, reporting documents and the necessary tools to complete the inspection process.

These may include:

Cleaning materials
: Brooms, industrial vacuum cleaners, mops, squeegees, shovels, pressure washers, steam cleaners and detergents.

Tools & Equipment
: Access to power, torch and/or lights, step ladder, grinder, sander, cutting equipment, welder, general engineering tools including paint scrapers and wire brushes. Miscellaneous equipment including paint brushes and also sheets of paper for the testing of Transferable Stains.

Paints, Sealants and Tape
: Food grade sealant, tape and paints.

Spare Parts
: Seals and gaskets, wooden flooring and metal sheeting.

Container Handling Equipment
: Mobile equipment suitable for the pickup and relocation of containers.

5 Container Assessment Procedure (cont)

5.4 General Inspection

5.4.1 Workplace Health & Safety

A work site 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.

At all times all personnel must comply with all regulatory and individual company WH&S policies. This may include on entering a site personnel reporting to the site office and/or a responsible person and informing them of attendance and completion of induction procedures.

5.4.2 General Container Examination

Containers must be examined in a systematic and efficient manner, taking into consideration their cargo worthiness, security, safe handling, and goods to be loaded (i.e., to prevent contamination or infestation of the cargo).

General things to look for when examining a container include:

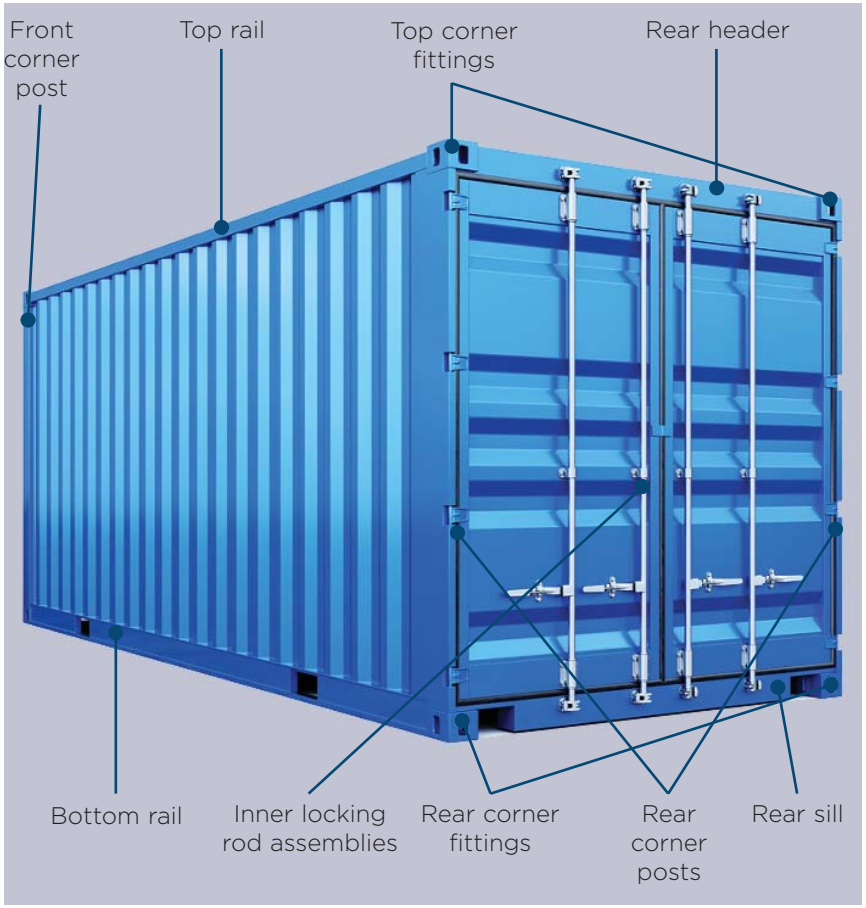
- Structural faults in floors, walls, doors and ceilings which may allow the entry of water, insects or contaminants, or have the potential to damage the product or product packaging.
- Moisture.
- Live and dead insects, insect eggs.
- Vermin.
- Mould.
- Rust which is flaking or causing structural damage.
- Paint which is cracked or flaking that will potentially contaminate the cargo.
- Transferable stains such as oil or hydraulic fluid that has leaked from forklifts or other items of handling equipment.
- Any residue or odour from previous cargoes, from cleaning chemicals or odour- masking chemicals.
- Odorous fresh or uncured paint, the solvents or odours of which may taint cargoes.

5 Container Assessment Procedure (cont)

5.5 External Container Inspection

The external assessment of a container is a process to judge the container to determine if it is safe to use, is cargo capable and is free from any biosecurity contaminants.

Figure 2 The main external features of a container.



5.5.1 General External Container Description

A compliant Safety Approval Plate is verification that the container has been approved by an authorised organisation as compliant with the International Convention for Safe Containers as required by Marine Order 44. That approval process is a separate process from the focus of this Standard but should be considered when preparing a container for export. See fact sheet for more details (Appendix 4).

The general external appearance is insignificant, providing the container fulfils the other criteria outlined in this section.

The container must be cargo worthy, that is:

- Be in a sound, safe condition.
- Comply with CSC, TIR, ISO and DAWE requirements when used for prescribed goods.
- Be in a weatherproof condition:
  - Fitted with adequate door gaskets.
  - Have functional door securing & sealing components.
  - Have no holes that allow the entry of water, insects or contaminants that can potentially cause damage to the goods being exported.
- The exterior of the container may have poor quality or mis-matched paint. Provided the structural integrity of the container is maintained, while unsightly, this is acceptable under this Standard.
- The container may flex:
  - Due to not being on a level ground surface or truck.
  - Care needs to be taken to ensure that there are no gaps in any seals that may be unable to be visually identified because of the flexing of the container.
  - If required, re-position the container to a more level surface and conduct the inspection.

All external surfaces of the container are to be inspected for potential biosecurity contaminants and for any damage as outlined in section 4.5. This includes the underside of all containers where possible:

- By placing the container on supports;
- When raised by forklift; and
- Before removal from a transport unit (i.e., truck).

5 Container Assessment Procedure (cont)

5.5.2 Holes and Cracks

5.5.2.1 General

The external walls, roof and floor including joins, must:

- Have no holes that penetrate through the outer and inner container layers that may allow entry of water, insects or contaminants that can potentially cause damage to the goods being exported:
  - In the walls.
  - In the roof.
  - Around discharge chutes and roof hatches (if present).
  - Around air vents and other potential water ingress areas.
  - Particular attention should be paid to the corner castings as they can be damaged by twist lock action.
- Where cracks or damage appears and the damage leads to the container being in an unsound condition, then that container fails to meet this standard and needs to be repaired before use.

5.5.2.2 Criteria to meet the Standard

The following table summarises the criteria for a container to either meet or fail to meet this Holes and Cracks standard.

CRITERIA: Hole in wall, roof, floor or join	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Permitted if does not penetrate through inner wall	Unacceptable if hole penetrates through to inside of container

CRITERIA: Crack in wall, roof, floor or join	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Permitted if does not penetrate through inner wall	Unacceptable if crack penetrates through to inside of container

CRITERIA: Container Integrity	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Acceptable if integrity maintained	Unacceptable if cracks or damage renders the container unsound

5 Container Assessment Procedure (cont)

5.5.3 Rust

5.5.3.1 General

Rust on the exterior of a container is not a reason for a container failing an inspection:

- Rust may appear on any surface of the container but is more prevalent:
  - In damaged sections;
  - Where moisture may gather; and
  - Where two or more surfaces are joined (i.e., door and floor).
- Light rust that is on the surface of a container is generally acceptable.
- Rust considered more than surface or light, can result in holes and cracks that may render the container not to meet the Standard.
- If left untreated can eventually give rise to structural weakness meaning the container is unsound and will not meet the Standard.

5.5.3.2 Criteria to meet the Standard

The following table summarises the criteria for a container to either meet or fail to meet this standard.

CRITERIA: Rust on any surface	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Light surface rust only	Heavy rust resulting in penetration through the outer and inner layer

5.5.4 Door Gaskets & Rubber Seals

5.5.4.1 General

Door gaskets and rubber seals deteriorate over time. Door gaskets and rubber seals must:

- Be intact to the extent that they do not allow water entry into the container.
- Seals can be broken or cut providing they do not allow water ingress.
- They must be sufficiently pliable to make certain that a weatherproof seal can be maintained.
- The surfaces they seal should be smooth and free of excessive rust or scale build-up that will prevent effective sealing.
- In general damage occurs more frequently in the lower door seals than those higher up.
- As with other causes of holes, to determine if the door seals are adequate close all doors and determine if light enters the container.
- If door seals are damaged (for example cut) but remain intact and weatherproof this is acceptable as per this Standard.

5.5.4.2 Criteria to meet the Standard

The following table summarises the criteria for a container to either meet or fail to meet this standard.

CRITERIA: Door gasket and rubber seal damaged	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Pliable and weatherproof	Damaged to the extent it allows water ingress (or light)

CRITERIA: Rust and scale around door area	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Gasket or rubber seal remain weatherproof	Unacceptable if door cannot be sealed

5 Container Assessment Procedure (cont)

5.5.5 Labels

5.5.5.1 General

Labels:
- Are present in a variety of forms, colours and sizes.
- May be present on any surface of a container.
- Are placed on a container to indicate a range of factors including:
  - The type of the cargo in the container.
  - The hazardous nature of the cargo i.e., flammability, toxicity.
- Inappropriate labels from the previous cargo and any offensive material must be removed from all external surfaces of the container to the extent that they are not discernible.
- Slight traces of a label may remain provided the writing and nature of that label is not distinguishable.
- The presence of a large number of partially removed labels (that does not render the container to fail under this Standard) may be unsightly but is permitted.

5.5.5.2 Criteria to meet the Standard

The following table summarises the criteria for a container to either meet or fail to meet this standard.

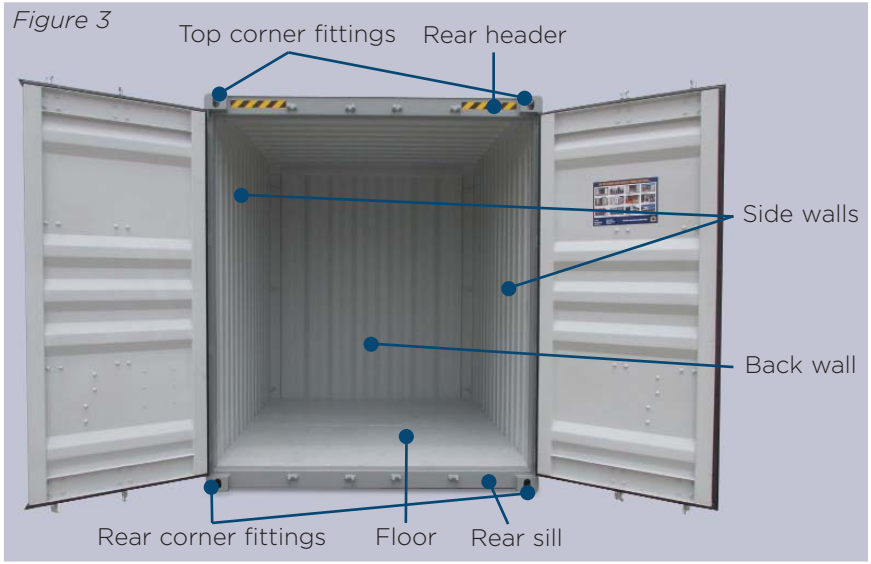
CRITERIA: Label visually apparent on external surface of container	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Acceptable if label writing cannot be discerned, is non-offensive and not cargo related	Label writing is prior cargo related and clearly visible. Offensive writing is visible.

5.6 Internal Container Inspection

5.6.1 Internal Container Condition

The following diagram describes the main internal features of a container.

Figure 3



Unlike the external appearance, the internal appearance is significant as often issues that render the container “in poor condition visually”, are a cause for the container not to meet this Standard. To meet this Standard the interior of the container;

- Must be closely inspected.
- Must be in a sound, safe condition.
- General damage to interior surfaces may have been caused during the loading and unloading process. The damaged surface may then corrode, resulting in rust and holes that need repair.
- Comply with CSC, TIR, ISO and DAWE requirements.
- Be in a weatherproof condition as per the external areas of the container, being:
  - Fitted with adequate door gaskets.
  - Have functional door securing & sealing components.
  - Have no holes that allow the entry of water, insects or contaminants that can potentially cause damage to the goods being loaded for export.

5 Container Assessment Procedure (cont)

5.6.2 Holes, Gaps and Protrusions

Floors are vulnerable to damage due to the loading and unloading process and equipment used for that task. While mainly related to the floor area, all surfaces of the interior of the container being Walls, Floor and Ceiling Surfaces should be checked for the following.

5.6.2.1 Holes

Holes may be present in doors seals, walls, floor or the roof:

- Any holes that penetrate through the entire container to the outside, no matter the size is not acceptable.
- Where holes are apparent on the interior surface of the container but not on the outside, these should be repaired as they may be harbourages for insects or other contaminants that may contaminate the goods to be loaded.
- Holes may be caused by various means such as removal of nails in flooring, during loading and unloading of prior cargoes.
- Holes can be identified by closing the doors and conducting a thorough inspection of all surfaces to determine if light enters from the outside.
- When inspecting the floor area, a dark surface immediately under the container (i.e., container is inspected on the ground) may prevent light penetration through holes.

5.6.2.2 Gaps

Gaps may appear in various locations within the container. Where gaps are present these should be closely inspected:

- Gaps may appear in flooring;
- Gaps may appear between the flooring and the door;
- Gaps may appear between the flooring and wall; and
- Gaps may be harbourages for insects or other contaminants that may contaminate the goods to be loaded.
- There must be no gaps
  - large enough to contain infestible residue or live pests where the presence or absence of infestible residue or live pests cannot be determined visually;
  - where the presence of infestible residue or live insects cannot be determined, the gaps must be thoroughly cleaned and sealed;
  - It is preferable that any gap is thoroughly cleaned and sealed to prevent cargo or other residues/contaminants from entering.
- The sealant used to repair must be of food grade type and not transfer (physically or odour) to the cargo to be loaded or during the loading process.
- Any repairs to gaps should be closely examined to ensure no partial gaps have arisen.

5 Container Assessment Procedure (cont)

5.6.2.3 Door Seals

Door seals must:

- Form a tight seal/fit around the entire door frame area. This can be determined by closing the door and determining (from the inside) whether any light penetrates.
- Be adequate to prevent the entry of vermin, insects and water.
- Be adequate to enable the container to be classified as fully sealed for the purposes of fumigation.
- Where loose, be repaired or replaced.

5.6.2.4 Gouges

Gouges relate to the plywood floor of the container:

- Are generally caused by scraping machinery or cargo along the plywood floor of the container during the loading or unloading process.
- When gouges in the plywood floor are smooth with no sharp edges, they are acceptable under this Standard.
- When gouges are not smooth, that is edges are apparent by rubbing your fingers along the edge, they must be repaired prior to the container being approved under this Standard.

5.6.2.5 Protrusions, projections or sharp edges

Protrusions, projections or sharp edges should be inspected carefully:

- Given their nature, they may be a safety hazard during the inspection procedure. Therefore, care should be taken if running your hand across a surface to determine if it is smooth or a protrusion is present.
- They may be present on any internal surface of the container but are generally in the lower areas.
- There must be no loose wooden particles and /or splinters in the flooring material.
- Are generally caused by:
  - Inadequate repairs to the container following damage, leaving edges that were not appropriately smoothed off and are thus not flush with the surface.
  - When repairing gaps, the repair must be smooth to prevent possible damage and thus contamination of the cargo to be loaded.
  - Projections from the surface of the container such as nails, bolts, screws etc.
- They must be repaired or removed as failure to do so could tear or chafe the packaging and damage the cargo to be loaded, or, as noted above, be a safety hazard.
- Where repairs have occurred, these should be closely examined to ensure their structural integrity remains intact.
- Where the repair material has become raised, loose, flaked, rusty etc. further repairs are required to renew the structural integrity; and
- No residues have entered that may harbour insects or infestible material.

5 Container Assessment Procedure (cont)

5.6.2.6 Criteria to meet the Standard

The following table summarises the criteria for a container to either meet or fail to meet this standard. In the event an issue leads to a container failing the Standard steps to rectify the issue are to be employed.

CRITERIA: Holes	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Not visually apparent	Any sized hole that may harbour infestible material or insects

CRITERIA: Gaps in floor boards or any other surface	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
No gaps visually apparent large enough to contain infestible residue or live insects	Any gap present as per photo

CRITERIA: Splinters	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Not visually apparent or discerned via rubbing	Any level visually present as per photo

CRITERIA: Gouges in floor with sharp edges	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Not visually apparent or discerned via rubbing	Any level visually present as per photo

CRITERIA: Door seals	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
No loose or missing seal portions allowing light entry	Any light entry or protrusions are not permitted

CRITERIA: Previous repairs to gaps	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Permitted provided integrity remains	Any level of flaking or edging of repair material is unacceptable

CRITERIA: Previous repairs to gaps	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Permitted provided no gap visually apparent	Any part of the repair where a gap large enough to contain infestible residue or live insects is present is unacceptable

CRITERIA: Repair is raised and not smooth with container surface	
● **Acceptable / Pass Standard**	● **Unacceptable / Fail Standard**
Must be smooth with surface	Any raised or sharp area of the repair over the surface

5 Container Assessment Procedure (cont)

5.6.3 Vents

5.6.3.1 General

Vents are generally located in high areas of the container near the corner of two walls. Vents should be inspected:

- To determine if their edges are adequately sealed to the surrounding container walls.
- To determine if they prevent the entry of vermin and other pests.
- To determine if they can be sealed if required for the purposes of fumigation.
- And it is recommended they be sealed over with tape as one of the last operations in preparing a container to be inspected for classification under this Standard. In that way, leaving the vents open for as long as possible may assist in the removal of any unacceptable moisture and odour from the container.

5.6.3.2 Criteria to meet the Standard

The following table summarises the criteria for a container to either meet or fail to meet this Standard.

CRITERIA: Vent edges with container wall	
● **Acceptable / Pass Standard** Must be adequately sealed	● **Unacceptable / Fail Standard** Unacceptable if gaps exist

CRITERIA: Holes and Gaps	
● **Acceptable / Pass Standard** Must be adequately sealed	● **Unacceptable / Fail Standard** Unacceptable if holes or gaps exist that cannot be adequately sealed

CRITERIA: Sealable for the purposes of fumigation	
● **Acceptable / Pass Standard** Must be adequately sealed	● **Unacceptable / Fail Standard** Unacceptable if gaps exist

5.6.4 Paint

5.6.4.1 General

Where repairs are made to the walls or roof of a container, it is recommended that painting occurs in order to prevent possible future damage to the interior of the container:

- Any type of food grade paint may be used.
- When re-painting areas within a container, a different colour may be used from the previous paint colour. While this may render the container visually poor, it is permitted provided the container meets the Standards described in this document.
- Appropriate re-painting procedures must be followed such as priming, undercoat and topcoat (refer repairs).
- For various reasons, the inside of a container may be totally re-painted. If this occurs, it is recommended that all necessary repairs to the container are completed first, to the extent required for the container to pass this standard.
- Touching-up any surface rust patches with paint could make a container unacceptable for the carriage of foods stuffs if it emanates an odour.
- If repairs are not done correctly or part, or all of the container is not re-painted adequately:
  - The repair may fail;
  - Flaking paint may occur and potentially harbour insects and other contaminants;
  - The paint in the painted section may blister as a result of previous cargoes. The paint may then rub onto the cargo to be loaded and thus be considered an unacceptable contaminant.
  - The poorly painted area may lead to rust development to the extent the container does not meet this Standard (i.e., the rust is flaky and/or is transferable).
- Once painting occurs, sufficient time must be allowed:
  - For paint to dry; and
  - For paint odours to be expelled from the container; and
  - Prior to re-inspection and determining whether the container is now approved as per this Standard (refer to repairs).

5 Container Assessment Procedure (cont)

5.6.4.2 Criteria to meet the Standard

The following table summarises the criteria for a container to either meet or fail to meet this standard.

CRITERIA: Flaking paint	
● **Acceptable / Pass Standard** No flaking paint	● **Unacceptable / Fail Standard** Unacceptable if any flaking paint exists

CRITERIA: Blistering paint	
● **Acceptable / Pass Standard** No flaking paint	● **Unacceptable / Fail Standard** Unacceptable if any blistering paint exists

CRITERIA: Soft paint (easily removed)	
● **Acceptable / Pass Standard** None able to be removed from surface	● **Unacceptable / Fail Standard** Unacceptable if any soft paint exists

CRITERIA: Paint has rubbed off and no longer present, exposing bare metal with no rust visible (i.e., scratches, rubbing)	
● **Acceptable / Pass Standard** Permitted	● **Unacceptable / Fail Standard** Any level of flaking rust or transferable rust is unacceptable

CRITERIA: Paint has rubbed off and no longer present, exposing bare metal with rust visible (i.e., scratches, rubbing)	
● **Acceptable / Pass Standard** Acceptable if rust is not flaking or transferable	● **Unacceptable / Fail Standard** Any level of flaking rust or transferable rust is unacceptable

CRITERIA: Top paint coat removed, undercoat/primer visable	
● **Acceptable / Pass Standard** Permitted	● **Unacceptable / Fail Standard** Unacceptable if primer/undercoat damaged and flaking

5 Container Assessment Procedure (cont)

5.6.5 Rust

5.6.5.1 General

Rust may arise through paint rubbing off or paint being damaged, revealing the bare metal of the container. Over time moisture ingress (i.e., leakage, humidity) causes rust.

Refer also to 5.6.

Rust may be identified:

- Visually apparent on any metal surface within the container.
- Surface rust is acceptable provided it is not flaky or transferable to the cargo.
- If the rust is not flaky or transferable, it is not mandatory to re-paint the rust. However over time if left unpainted further degradation may occur leading to the rust becoming flaky and transferable.
- The container does not meet this standard:
  - If there is any level of transferable rust that could stain the cargo.
  - If there is any level of flaky rust.
- To determine if the rust is transferable, then:
  - Obtain a white piece of porous paper.
  - Gently rub the paper onto the surface of the container where the rust is located.
  - Rubbing should be by using a gentle force, enough to transfer any rust as a stain onto the paper without breaking the paper.
  - If the rust is transferred to the paper it will be visible to any extent. This is referred to as a transferable stain.

5.6.5.2 Criteria to meet the Standard

The following table summarises the criteria for a container to either meet or fail to meet this standard.

CRITERIA: Bare rust visable and transferable	
● **Acceptable / Pass Standard** Must be non-transferable	● **Unacceptable / Fail Standard** Any level of transferable rust is unacceptable

CRITERIA: Bare rust visable and flaky	
● **Acceptable / Pass Standard** Flaky rust not permitted	● **Unacceptable / Fail Standard** Any level of flaky rust visually present as per photo is unacceptable

5 Container Assessment Procedure (cont)

5.6.6 Moisture and Stains

5.6.6.1 Moisture

Signs of leaks resulting in moisture ingress will be revealed as:

- Damp patches on the floor, arising from leakage of water into the container.
- Stains on any wall or roof surface that are damp to the touch.
- The interior surfaces (walls, roof and floor) of the container must be dry to the touch.
- No free moisture should be present on the walls, floor or internal roof of a container.
- Water condensation may appear on the internal roof of a container over winter. To remove, open the doors and allow to dry before inspection/re-inspection.
- Moisture over time may lead to mould:
  - Mould may be visually apparent and is generally dark in colour, but the colour may vary;
  - Mould may rub off when touched (take care, gloves are recommended when handling mould areas due to food safety issues); and
  - There should be no mould on any part of the interior of the container. The presence of any level of mould renders the container not acceptable under this Standard and must be removed.

5.6.6.2 Stains

Stains on any surface of the container may be caused by a variety of means:

- Stains on the walls, roof or floor.
  - Stains may be caused by a number of factors including the prior cargo, rust, water leakage, material used to make repairs, tyre marks or oil leakage from unloading/loading equipment.
  - Rub marks may be caused by or during loading or unloading of the previous cargo, or movement of the cargo and rubbing against the internal surfaces of the container.
  - Stains can be detected by:
    - Being visually apparent; and
    - Gently wiping the affected area with your hand and the stain transferring to the fingers.
  - Transferable stains and rub marks
    - To determine if the stains and rub marks are transferable, then:
      - Obtain a white piece of porous paper; and
      - Gently rub the paper onto the surface of the container where the stains or rub mark is located.
      - Rubbing should be by using a gentle force, enough to transfer the stain or rub mark onto the paper without breaking the paper.
      - If the stain or rub mark is transferred to the paper it will be visible to any extent. This is referred to as a transferable stain.
    - Are not acceptable under this standard.
    - Transferable stains are to be removed or cleaned in order for the stain to be classified as non-transferable.
    - Must be removed prior to permission to load the cargo.
  - Non-transferable stains and rub marks
    - Are not transferable - and do not rub off or transfer onto paper; and
    - Are acceptable under this standard.
    - Non-transferable stains are not classed as a contaminant and can be left as is without further treatment; and
    - Are not required to be removed prior to loading the cargo.

5 Container Assessment Procedure (cont)

- Oil stains on the floor
  - As with other stains, oil stains that are non-transferable are acceptable under this Standard.
  - Containers with transferable oil stains are not suitable for prescribed grains. These containers may be used for other prescribed commodities but should be thoroughly cleaned before use or used with an approved liner.
  - Carefully inspect any lining in the container as some floor stains may be covered with paper or lining.
  - Small non-transferable oil stains could also be covered with a polyethylene or other suitable lining.

5.6.6.3 Criteria to meet the Standard

The following table summarises the criteria for a container to either meet or fail to meet this standard.

CRITERIA: Moisture or wet stain visible or apparent to the touch on any surface	
● **Acceptable / Pass Standard** Not permitted	● **Unacceptable / Fail Standard** Any level of moisture is unacceptable

CRITERIA: Mould visible on any surface or apparent to the touch by being able to be rubbed off	
● **Acceptable / Pass Standard** Not permitted	● **Unacceptable / Fail Standard** Any level of mould is unacceptable

CRITERIA: Non-transferable rub marks	
● **Acceptable / Pass Standard** Permitted	● **Unacceptable / Fail Standard** Any level of transferable rub mark is unacceptable

CRITERIA: Transferable rub marks	
● **Acceptable / Pass Standard** Must be non-transferable	● **Unacceptable / Fail Standard** Any level of transferable rub mark is unacceptable

CRITERIA: Non-transferable stain	
● **Acceptable / Pass Standard** Permitted	● **Unacceptable / Fail Standard** Any level of transferable stain is unacceptable

CRITERIA: Transferable stain	
● **Acceptable / Pass Standard** Must be non-transferable	● **Unacceptable / Fail Standard** Any level of transferable stain is unacceptable

CRITERIA: Non-transferable oil stain	
● **Acceptable / Pass Standard** Permitted	● **Unacceptable / Fail Standard** Any level of transferable stain is unacceptable

CRITERIA: Transferable oil stain	
● **Acceptable / Pass Standard** Must be non-transferable	● **Unacceptable / Fail Standard** Any level of transferable stain is unacceptable

CRITERIA: Tyre marks on floor	
● **Acceptable / Pass Standard** Permitted	● **Unacceptable / Fail Standard** Any level of transferable tyre mark is unacceptable

CRITERIA: Tyre marks causing gauges on the floor	
● **Acceptable / Pass Standard** Marks must be non-transferable, and gauges must have smooth edges	● **Unacceptable / Fail Standard** Any level of transferable tyre mark is unacceptable. If gauges are not smooth and/or splintered, not permitted

5 Container Assessment Procedure (cont)

5.6.7 Residue / Contaminants

5.6.7.1 General Description

For the purposes of this section of the Standard, Residues:

- Are often referred to as Contaminants.
- May include plant material from previous cargoes or other contaminants present in the container as a result of other activities.
- May be organic (i.e., plant material such as seeds, grains) or inert material (i.e., fertiliser, plastic, rope, metal, stones, flaking paint, rust, wet oil, wet paint, wet adhesive from tape).
- Loose residues of plant material should not exist in any quantity or form as they may contaminate, infest, transfer to or damage the cargo to be loaded.
- Loose residues of other inert or non-organic contaminates that would physically mix with or affect the condition of the product must not be present at any level. This includes stones and soil that may have been picked up in the tyres from cargo unloading equipment and transferred into the container.
- Where the residue present is not dry but wet or sticky this must be treated and/or removed to prevent transfer to the cargo to be loaded. This includes all material that is considered transferable and includes:
  - Oily residue; and/or
  - Sticky residue from tape or similar material.
- Where the residue is present on the floor or walls of the container, is dry and will not transfer to cargo to be loaded, any level is permitted. This includes:
  - Adhesive from tape that is dry; or
  - Any material that adheres to the container that does not contain loose material or particles that may fall off and transfer to the cargo during or following loading.
- For insect control treatments:
  - Insect dust treatments must be removed and not be visibly apparent.
  - Chemical sprays must be dry and not emit an odour.
  - All label directions, including with-holding periods must be complied with commencement of loading of the container.
- For some contaminants such as adhesive from tape, cleaning compounds may be required provided they do not lead to further contamination of the cargo to be loaded.
- Note that contaminants in cracks in floors must be removed to meet this Standard. Refer to repairs.
- In some instances, if the residue is infestible the container may require washing or steam cleaning in order to remove all traces. The container if washed out must be dried before re-inspection (refer to re-inspection).
- Refer also to other sections of 4.6 that provide further detail for specific contaminants that may be present.

5 Container Assessment Procedure (cont)

5.6.7.2 Criteria to meet the Standard

The following table summarises the criteria for a container to either meet or fail to meet this standard.

CRITERIA: Presence of previous cargo	
● **Acceptable / Pass Standard** Must be completely absent	● **Unacceptable / Fail Standard** Any level is not acceptable

CRITERIA: Infestible residue	
● **Acceptable / Pass Standard** Must be completely absent	● **Unacceptable / Fail Standard** Any level is not acceptable

CRITERIA: Organic material	
● **Acceptable / Pass Standard** Must be completely absent	● **Unacceptable / Fail Standard** Any level is not acceptable

CRITERIA: Loose inert or inorganic material that may contaminate the cargo	
● **Acceptable / Pass Standard** Must be completely absent	● **Unacceptable / Fail Standard** Any level is not acceptable

CRITERIA: Inert or inorganic material that may contaminate the cargo that is wet or sticky. May or may not adhere to the container. Includes oily residue that is transferable	
● **Acceptable / Pass Standard** Must be completely absent	● **Unacceptable / Fail Standard** Any level is not acceptable

CRITERIA: Residue from insect treatment (i.e., insect dust treatment, chemical residue)	
● **Acceptable / Pass Standard** Not visually apparent	● **Unacceptable / Fail Standard** Any level is not acceptable

6 Container Cleaning

6.1 General Cleaning Methods

Under the Export Control Act 1982 there is no regulatory requirement specifying the type of cleaning agents to be used. However, it is highly recommended that any cleaning agents used are food grade and or suitable for use on food contact surfaces.

Various cleaning methods may be used to upgrade a container to a food quality standard. One or more may be used in combination.

In some instances, a simple sweep-out or a water wash may suffice. However, where required to be used, there are many types of cleaning equipment and products that are effective in removing odours, stains, loose material and oily residues.

Some solvents and cleaning products may produce odours that will taint a cargo to be loaded and therefore should not be used. For commodities such as grain which come into contact with the container surfaces when loaded in bulk, it is essential that the container does not increase the risk of contaminating the commodity with cleaning products or paint.

There are advantages and disadvantages for each of the various cleaning methods available for use:

- Dry sweep out. A sweep out and clean may be more appropriate instead of washing with water, given the potential delay in container availability while drying occurs.
- Vacuuming. May be useful to remove residue from cracks and holes, where sweeping may be ineffective.
- Spreading absorbent powder and then sweeping out and/or vacuuming.
- Low pressure water wash - utilising cold water without using any cleaning agent.
- High pressure water wash.
- Aqueous ozone wash. Aqueous ozone washes can be used to sanitise surfaces by removing microbial bodies including bacterial odours.
- Cold water wash with or without a specific cleaning agent.
- Hot water wash with or without a specific cleaning agent. Hot water washing will generate heat, which may result in strong and irritating vapours being given off; these vapours may affect the container and the cargo to be carried.
- Steam cleaning with or without a specific cleaning agent. Temperatures of 150°C may be reached during steam cleaning that could cause the paint to peel and affect bonding of plywood floors.
- Floor coating / sealing with varnish to ensure a protective finish or film.
- Solvent cleaning. The treatment of mould on the internal surface of a container may require spray application of a fungicide. This may result in persistent odours and adverse reactions with the cargo to be loaded. Some countries have regulatory national requirements relating to the type of cleaning agent that may be used on the internal surfaces of containers designed to carry food. This may also include regulations on the limit of a fungicide that may be transferred from the container to the goods to be loaded.
- Scraping, sanding with a sanding disc or wire disc. There are dangers and considerable additional costs involved in the sanding of floors, which may lead to degrading of the containers in the long term.
- Fumigation. Must be followed by cleaning of infested material.

When water (hot or cold in various forms) is utilised to clean a container, it is imperative that the container is adequately ventilated (with the doors open) and dried prior to use.

6.2 Dealing with Insect Infestation and Other Pests

In all cases there is a nil tolerance on live insect pests, and live vermin in the empty container. Insects relate to all life stages being eggs, pupae, larvae and adults. Containers should also not contain or harbour any live or dead pests such as snails, mice or droppings etc.

If quarantine pests are suspected, they must be reported to DAWE through the "See. Secure. Report" hotline on 1800 798 636. The AO should seek assistance, if needed, to identify the pest via the hotline.

Go to the *Reference: Pests, Diseases and Contaminants of Grain and Plant Products* for images of and information about quarantine pests an AO may encounter when inspecting shipping containers for the export of prescribed goods.

Important: if live Trogoderma spp. or other quarantine pests are suspected, the empty container must be rejected. Inspection AOs must not specify the type of treatment required unless suspected Trogoderma spp. are detected. The choice of treatment for non-Trogoderma spp. infestations and other residues or contaminants is the responsibility of the client.

The container must not be passed for export until the identity of the quarantine pest has been determined.

6 Container Cleaning (cont)

When disinfesting a container:

- All relevant regulations must be complied with, including;
  - Workplace health and safety; and
  - The location of fumigation/treatment; and
  - The use of approved chemicals only, taking into consideration the cargo to be loaded; and
  - All chemical label directions, including ventilation and with-holding periods; and
  - Where applicable, to be carried out only by licensed fumigators.
- Following treatment of a container, following the required ventilation period and other label directions:
  - A gas-free certificate should be obtained prior to unauthorised personnel entering the container for cleaning.
  - The container should be cleaned of all insect residue prior to re-inspection.
- Where fumigation has occurred, all taping over vents should be removed prior to re-inspection to ensure no insects are harboured in those areas.

If a container has been fumigated the person responsible for the unit must obtain a gas-free certificate before an inspection can be conducted.

6.3 Dealing with Odours

6.3.1 Definition and Cause of Odour

An odour is defined within the context of this Standard as being "not normally associated with the container". In general terms, this means:

- Any odour detected within the container when the door is first opened.
- Any odour detected is considered harmful and may have a negative impact on the cargo to be loaded.
- For example, no harmful or offensive odours are allowed for food grade compatible containers (e.g. phenol, paint, solvent, chlorine, chemicals, epoxy resin, disinfectant or mustiness) as these odours will permeate into the cargo to be loaded during the voyage.
- The detection of an odour is a subjective assessment and cannot be quantified. However, a second opinion may be warranted where doubt exists.
- Judgement of an odour must be made on the basis of the initial impression gained when the container door is first opened.
- An odour of any kind is unacceptable.

Odour may be caused by various means such as:

- The previous cargo carried.
- Cleaning products.
- Disinfestation methods.
- Paint.
- Pests and vermin.
- Contaminants in the container.
- Repair methods.
- Improper drying.
- Mould and / or bacterial development.
- An extended period of the container being sealed.

6.3.2 Removal of Odour

If an odour is present and is not strong, objectionable or acrid it may be removed by steam cleaning.

Odours such as those from fresh paint or mustiness (due to insufficient drying after washing), can be rectified or avoided by proper airing / ventilation.

Odour may develop as a result of bacterial action. Use of a neutralising agent that acts on the bacteria (not a masking agent) will remove this. Note that masking agents are not permitted to be used.

Note that an odour that readily dissipates upon the opening of the container might recur when the container is subsequently resealed. This is a higher risk if the container is stored in an area of high ambient temperature, e.g. in a railway siding during the height of summer. Hence the impact of the odour during transit of the loaded cargo should be considered when determining the method of removal of the odour.

If the odour persists the container is not suitable by terms of the aforementioned rules and regulations. Persistent odours are not acceptable - there should not be a presence of any smell of a particular substance or of an unpleasant nature within the container which continues after the container has been vented with doors fully open for 30 minutes then closed and reopened at least 12 hours later.

7 Container Repairs

As outlined in Section 5, various aspects of a container both external and internal are required to be of sufficient structural integrity in order for a container to pass this Standard.

Where repairs are required, these should be conducted:

- In a suitable area;
- By suitably qualified personnel;
- In a timely manner; and
- To a level required considering the nature of the cargo to be loaded and the status of the container.

When reviewing the following section, reference should also be made to Appendix 1 and 2 depicting photographs of acceptable and unacceptable repairs for containers under this Standard.

7.1 Holes, Cracks & General Damage

Section 5 details requirements for the condition of all exterior and interior surfaces of a container. Where any defects are present that require attention, in general the following principles apply:

- Prior to sealing any gaps, holes and cracks, remove any residue that may be present that may harbour insects (infestible material).
- Repairs and material used to repair containers should consider the cargo to be loaded and the potential impact on that cargo.
- The method of repair should consider the need for a short term or long-term viability and lifetime use of the container.
- Sufficient time following a repair must be allowed before inspection/re-inspection (i.e., time for sealant and / or paint to dry or moisture to evaporate).
- Where repairs are conducted following an inspection that may alter the status of the container under this Standard re-inspection is required.

7.2 Cosmetic Painting of Container Interiors

Under the Export Control Act 1982 there is no regulatory requirement for the type of paint to be used on the interior of a container. However, it is highly recommended that internal coatings comply with section 175300 of the US Food and Drug Administration Regulations. Paint manufacturers can provide evidence of compliance with this regulation.

The original interior paint finishes of containers have characteristics which make them resistant to scuffing and abrasions, suitable for cleaning and capable of withstanding condensation and other such conditions. These paints are applied on properly prepared surfaces under controlled manufacturing processes and conditions.

Once a container leaves the factory, it carries all types of cargoes and is subjected to normal wear. Hence the painted surface inevitably deteriorates or is damaged. In this condition paints and applicators without proper surface preparation are rarely suitable for adequate or long-lasting repairs or cosmetic re-sprays.

7 Container Repairs (cont)

When painting the interior of a container:

- The paint used may contain solvents and chemicals that generates an odour which is harmful to the cargo being carried and may lead to taint. This is especially applicable to fresh or uncured paint. Hence sufficient time for drying and curing must be allowed between painting and inspection prior to loading of a cargo.
- If cleaning, preparation and application of a compatible paint is not conducted appropriately it may fail very rapidly. The container will then be worse off than if it was never treated at all. This is particularly so when paints are applied over powdery, flaky or rusty surfaces as a quick cosmetic fix.
- Overspray is when panels around the affected areas are painted. Over-spray or spillage of paint onto sealant, seals or flooring can be a problem and may affect the container appearance. Under such conditions it may become transferable and thus unacceptable under this Standard. Overspray is not a problem as long as it does not become classified as transferable.

Painting may not always be the solution to overcoming container surface irregularities for short term benefits, as there can be numerous long-term harmful effects caused by 'quick-fix' painting. Any painting carried out to improve the condition of the container and its suitability to carry food or grain must be performed in a correct manner.

Before undertaking any interior painting, adequate time must be allocated before the container can be used again to allow for the paint to cure and for the dissipation of any fumes generated. Additionally, the following preparations are also essential to prevent problems such as flaking paint and blistering on container panels:

- The paint to be applied is compatible with the existing paint on the surfaces to be painted. This requires determining whether the existing paint is solvent-based or water-based.
- The surface is clean and dry. Poor quality surfaces should be sanded back, and undercoat applied followed by topcoat.

The re-spraying or painting of the interior of a container is also a practice commonly undertaken in order to improve the interior condition of a container and to cosmetically enhance its appearance. This is undertaken under various terms referred to as 'food upgrades, interior sand and touch up, mist coating, or food preparation'. It should be noted that any up-grade must be approached and conducted in a professional manner and not applied as 'a quick fix cover up.'

7.3 Floor Sanding

Sanding the entire container floor is a means of preparing containers for the carriage of foods and grains so that surface stains and marks are removed from the floor, and the appearance is enhanced.

When sanding it should be noted that:

- Sanding is an additional cost.
- Any remedial treatment is usually far less effective than the original coatings.
- Most floors have a protective surface coating designed to facilitate cleaning and to prevent the absorption of contaminates or oils. When this is removed the flooring becomes even more vulnerable to damage and contamination and therefore requires greater subsequent attention.
- Indiscriminate and unnecessary sanding of floors can have adverse effects on containers in both the short and longer term. It is simply a process, which uses abrasives to remove material by cutting and tearing and can easily remove up to two millimetres of flooring effectively reducing its strength, sometimes by a considerable amount.

With heavy duty drum or belt sanders:

- Skill is required to control the cutting and to prevent deep grooving in those areas where the machine is slowed, reversed or changed direction which in itself can cause additional damage.
- Sanding across the grain can tear and dislodge the fibres causing loose slivers and splinters to come away from the floor.
- When sanding, as the level of the wood is reduced, the surrounding steel-work and floor securing devices frequently have their protective paints, coatings or sealant torn

away so that they need to be treated. More commonly, they are left untreated and consequently deteriorate more rapidly than normal.

Where floors are marked:

- Common sense cleaning practices using detergent or solvent assisted washing, scrubbing or absorbent practices will remove or neutralise most oils or contaminants without the need to resort to sanding.
- In the event of any oil or contaminant soaking into the flooring the sanding process by its mechanical nature will only remove the surface layer, expose a fresh surface and is likely to be less effective than a good conventional clean. A conventional clean can be further enhanced by sealing the floor surface with a varnish.
- Markings on floors such as tyre burns, drum flange rings, bruises and scoring may appear unsightly however, they are generally non-transferable, inert and inoffensive and do not require sanding.

  Notwithstanding the above, there may be occasions when localised spot sanding is an acceptable solution.

For plywood and composite floors:

- Other than solid plank or vertically laminated timber floors there are numerous types of plywood, composite and other manufactured floorings in containers. These types of floor materials are much more susceptible to sanding damage than solid floors.
- Multi-layer or laminated floors are constructed so that the outer layers are the most durable or damage resistant. These outer layers are also quite thin and poor sanding can cut right through and into the glue lines or less resistant materials underneath. When this happens, the flooring breaks down and fails. Alternatively, the outer layer with its thin protective coating may be damaged and this also leads to premature degradation or failure.

7.4 Container Liners

One option for shippers wishing to ensure that their cargo is satisfactorily packed and protected is the use of full or partial disposable liners.

In some cases, these liners:

- Are an economical and acceptable alternative to carrying out maintenance such as painting, floor sanding or stain treatment.
- May be used to overcome superficial problems such as flaky paint, light rust, light transferable stains.
- Are not to be used where there are odours or infestible residues such as plant material or soil.

DAWE inspectors will accept linings on the condition that the normal standards set for the carriage of the prescribed goods are met and the liner itself is inspected and free from residues and infestible material.

Acceptable lining materials include:

- Composite water-resistant paper
- Polyethylene film
- Cardboard, Plywood and unbroken Particle Board
- Foils

It is important to note that when the commodity is in direct contact with the lining, the lining must comply with the Food Standards Australia New Zealand Food Standards Code - Standard 1.4.3 - Articles and Materials in Contact with Food.

If a liner is fitted before the container has been inspected the liner will be removed to ensure that the standard container inspection can be conducted. To avoid time wastage and unnecessary expense it is highly recommended that containers are inspected prior to the fitting of liners and/or their associated fastening devices.

Figure 4

Polyethylene Film Liner

Figure 5

Cardboard Liner

If liners are to be placed into the container after inspection, the materials to be used must be checked for insects, infestible residues and contaminants as per the empty container inspection.

8 Rejection Process - DAWE Inspection

This Standard covers the assessment of Food Grade Compatible and DAWE Certified containers. Following completion of a DAWE certified container inspection and subsequent rejection of the container:

- A record should be made of the reason for the rejection on the relevant DAWE document - the 'DAWE Container Approval Record'.
- A copy of the rejection record should initially be provided by the DAWE AO to the relevant stakeholders, depending on where the inspection occurred including:
  - The manager of the Container Packing Facility (CPF); and/or
  - The Shipper; and/or
  - The Shipping Line (SL) that supplied the Food Grade Compatible container.
- Depending on the severity of the issue that caused the rejection the SL and the management of the CPF may negotiate a means to rectify the issue at the CPF site and resubmit the rejected container for reinspection.
- There is no limit on the number of times a container may be rejected, although where a container is rejected multiple times for the same reason then due consideration should be given to the effectiveness of amelioration and the suitability of that container for the intended purpose.
- A container may be rejected for one or more reasons, as outlined in this Standard.
- Where rejected under this Standard, depending on the cause, the container may be suited for another purpose without the need for repairs or other measures to upgrade the container.

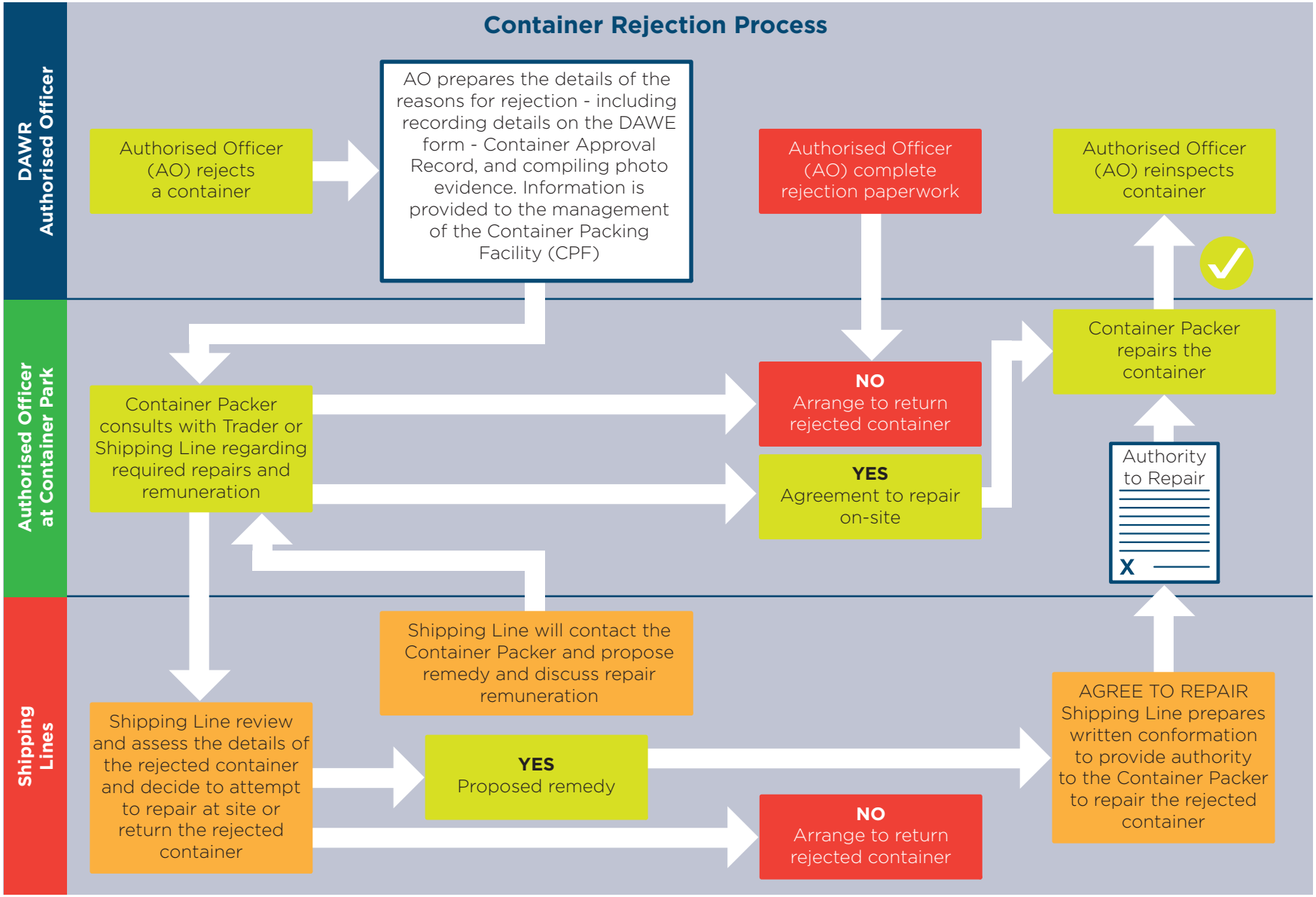
Note that where a DAWE AO rejects a container, as per DAWE requirements a number of actions must be implemented including advising the local DAWE office of the reasons and records must be retained for a minimum of 2 years. Stakeholders should consider adoption of similar procedures under this Standard.

The following is a process map outlining a range of stakeholders and processes to be considered during the rejection process. The purpose of the process map is to:

- Highlight issues to be considered; and
- Highlight the range of stakeholders involved and who are potentially impacted by a rejected container; and
- Encourage stakeholders to improve practices to minimise the impacts on all involved, including costs of managing rejected containers.

8 Rejection Process - DAWE Inspection (cont)

Rejected Container Process Map



9 Re-Inspection

Following cleaning and/or conducting the required repairs on the rejected container:

- The container should be re-inspected, allowing sufficient time to elapse for any cleaning processes to be fully completed (i.e., water to dry, odours to dissipate, paint to dry).
- During the re-inspection process:
  - The focus of the inspection should be on the previously identified issue(s) that caused the rejection and the remedial action taken to correct the cause or fault.
  - The entire container inspection process is to re-commence. That is, all areas of the container should be inspected to determine if the condition of the container in other areas has changed i.e. additional damage may have occurred during the cleaning/repair process.

Following re-inspection, the container should be passed as per the relevant Standard if all requirements are met.

10 Appendices & Reference Material

Appendix 1 Photographic Depiction of Exterior Container Standard

Holes and Cracks General Appearance (refer 5.5.2.1)

PLEASE NOTE:
The photographs in this Standard can be viewed in enhanced mode through the Adobe PDF zoom function.

ACCEPTABLE
Vent seal adequate but may be compromised over time and require repair.

ACCEPTABLE
Vent seal good quality.

NOT ACCEPTABLE
Vent is broken and requires repair/replacement.

ACCEPTABLE
Broken vent has been replaced and the replacement vent has been sealed.

Appendix 1 Photographic Depiction of Exterior Container Standard

Wall, roof, floor or join (refer 5.5.2.2)

Hole

NOT ACCEPTABLE
Prior repair inadequate and damage expected to continue under repair patch.

ASSESSMENT REQUIRED
Corrosive rust is blistering.
Use an approved chipping hammer to assess structural integrity.

ACCEPTABLE
Hole in wall has been repaired via the insertion of a welded panel that has been sealed and painted

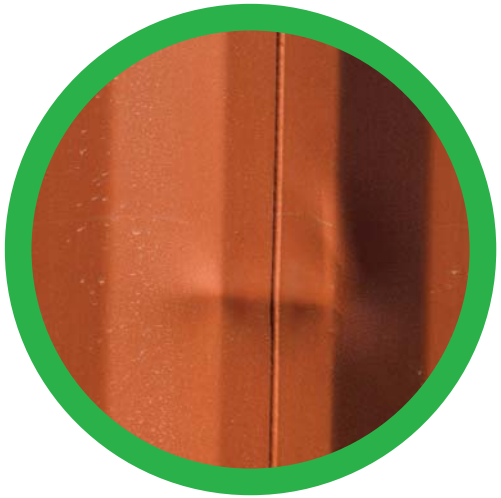
ASSESSMENT REQUIRED
Previous repair is heavily corroded.
Assess if still structurally sound by using an approved chipping hammer.

Appendix 1 Photographic Depiction of Exterior Container Standard

Wall, roof, floor or join (refer 5.5.2.2)

Crack

ASSESSMENT REQUIRED
Damage to exterior wall to be assessed for small cracks. Ascertain that no small cracks have penetrated to the inside of the container.

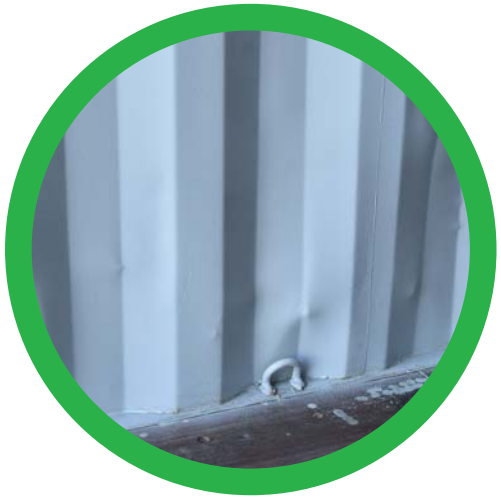


ACCEPTABLE
Internal dent has not penetrated the exterior panel and conforms to Marine Order 44, CSC and ISO Standards.

Appendix 1 Photographic Depiction of Exterior Container Standard

Wall, roof, floor or join (refer 5.5.2.2)

Structual Damage



ACCEPTABLE
Dent is acceptable as per Marine Order 44, CSC and ISO Standards.

ACCEPTABLE
Previous repair is sound.
Light rust occurring is acceptable as there is no blistering.

ACCEPTABLE
Hole in wall has been repaired via the insertion of a welded panel that has been sealed and painted

ASSESSMENT REQUIRED
Blistering corrosion has occurred.
Assess structural integrity with an approved chipping hammer and if required repair.

Appendix 1 Photographic Depiction of Exterior Container Standard

Rust (refer 5.5.3)

Rust on any surface

ASSESSMENT REQUIRED
Corrosive rust along the bottom of the door. Assess for structural integrity with an approved chipping hammer.

ASSESSMENT REQUIRED
Unacceptable where the rust has blistered and penetrated the outer wall.
However, if only surface rust then the container is in a weatherproof condition.

ACCEPTABLE
Surface rust is light; container is in a weatherproof condition.

ACCEPTABLE
Light surface rust
- container is in a weatherproof condition.

Appendix 1 Photographic Depiction of Exterior Container Standard

Rust (refer 5.5.3)

Rust on any surface (cont)

NOT ACCEPTABLE
Blistered rust has penetrated the outer wall and compromises integrity of container. Maybe un-repairable.

ACCEPTABLE
Light Surface rust - considered acceptable.

NOT ACCEPTABLE
Severe blistered rust and scale.

ACCEPTABLE
Light surface rust. Good prior repairs.

Appendix 1 Photographic Depiction of Exterior Container Standard

Door Gaskets and Rubber Seals (refer 5.5.4)

Door gaskets and rubber seals damaged

NOT ACCEPTABLE
Cut door seal may impact light and weather tightness. Perform a check. If the seal fails then a repair is required.

NOT ACCEPTABLE
Bottom seal has been checked and is not light and weather tight. Requires repair prior to being considered acceptable.

ACCEPTABLE
Cut bottom outer door seal. Light and weather proof - no further action required.

ACCEPTABLE
Door seals in good condition, all fully intact.

Appendix 1 Photographic Depiction of Exterior Container Standard

Door Gaskets and Rubber Seals (refer 5.5.4)

Door gaskets and rubber seals damaged (cont)

NOT ACCEPTABLE
Door seal is damaged and will not seal.

ASSESSMENT REQUIRED
Blistering rust can lift the gasket and impact on its ability to create an effective seal. Assess during light test.

ACCEPTABLE
Adequate door seal repair - container is cargo worthy.

ACCEPTABLE
Good door seal flush on door.

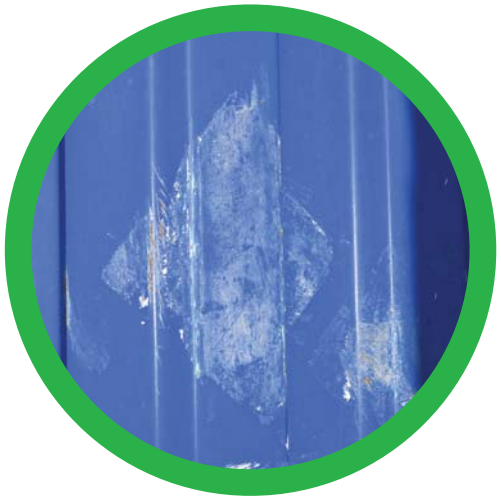
Appendix 1 Photographic Depiction of Exterior Container Standard

Labels (refer 5.5.5)

NOT ACCEPTABLE
All inappropriate labels are to be removed where they are readable

NOT ACCEPTABLE
All inappropriate labels are to be removed where they are readable

NOT ACCEPTABLE
All inappropriate labels are to be removed where they are readable



ACCEPTABLE
Majority of label removed, writing unreadable.

Appendix 2 Photographic Depiction of Interior Container Standard

General Interior of Container (refer 5.6.1)

NOT ACCEPTABLE
Evidence of transferable rust stains that will contaminate the cargo, requires repair.

ACCEPTABLE
Repaired and fully re-painted.

ACCEPTABLE
Repainted and floor revarnished.

Appendix 2 Photographic Depiction of Interior Container Standard

Holes, Gaps, Gouges, Protrusions (refer 5.6.2)

Holes

NOT ACCEPTABLE
Nail holes in the floor that have the potential to harbour insects and residue. Require repair.

NOT ACCEPTABLE
Split roof from outside damage, rust now present.

ACCEPTABLE
Damaged floor has been removed and replaced.

Appendix 2 Photographic Depiction of Interior Container Standard

Holes, Gaps, Gouges, Protrusions (refer 5.6.2)

Gaps in floor boards or any other surface

NOT ACCEPTABLE
Gap is considered a risk and does contain infestible residue.
Gap needs to be cleaned and sealed.

NOT ACCEPTABLE
Gap contains infestible residue.
Clean and seal.

ACCEPTABLE
Gap contains no infestible residue.
Consider sealing to prevent any possibility of contamination.

NOT ACCEPTABLE
Grain present in gap in floor.
Needs to be cleaned and sealed.

Appendix 2 Photographic Depiction of Interior Container Standard

Holes, Gaps, Gouges, Protrusions (refer 5.6.2)

Previous repairs to gaps

NOT ACCEPTABLE
Gouge in floor remains un-repaired. Transferable stain now present.

NOT ACCEPTABLE
Previous repair to gap between floor and wall has failed. Repair.

ACCEPTABLE
Gap fully cleaned and sealed.

ACCEPTABLE
Gap cleaned and fully sealed.

Appendix 2 Photographic Depiction of Interior Container Standard

Holes, Gaps, Gouges, Protrusions (refer 5.6.2)

Previous repairs to gaps (cont)

NOT ACCEPTABLE
Previous seal along wall has broken down. Infestible residue to be removed from gaps and reseal.

NOT ACCEPTABLE
Previous repair has broken down. Needs to be cleaned and resealed.

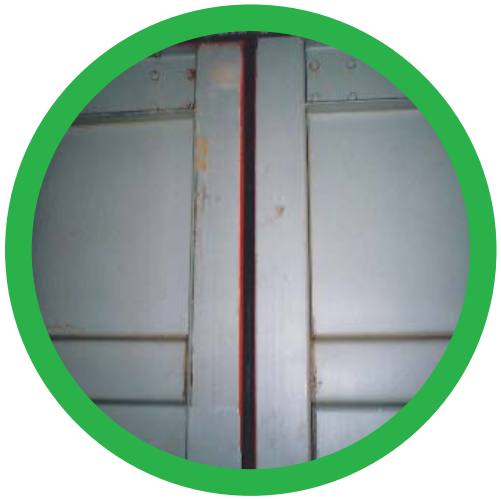
ACCEPTABLE
Acceptable repair.

Appendix 2 Photographic Depiction of Interior Container Standard

Holes, Gaps, Gouges, Protrusions (refer 5.6.2)

Door Seals

ASSESSMENT REQUIRED
Cut door seal may impact light and weather tightness. Perform a check. If the seal fails then a repair is required.



ACCEPTABLE
Door seal must form a light and weather tight seal.

ACCEPTABLE
Door seal replaced and forms a light and weather tight seal. Paint splashes acceptable.

Appendix 2 Photographic Depiction of Interior Container Standard

Holes, Gaps, Gouges, Protrusions (refer 5.6.2)

Gouges in floor with sharp edges

NOT ACCEPTABLE
Flooring damage has loose fibres and splinters and requires a finishing sanding.

NOT ACCEPTABLE
Flooring damage including the gouge in the floor requires repair.

ACCEPTABLE
Small gouge in floor.
Considered acceptable.

Appendix 2 Photographic Depiction of Interior Container Standard

Holes, Gaps, Gouges, Protrusions (refer 5.6.2)

Splinters

NOT ACCEPTABLE
Flooring damage has loose splinters and steel dividing strips in flooring have flaking rust.

NOT ACCEPTABLE
Loose splinters are evident. Needs repair.

ACCEPTABLE
Small gouges.
Considered acceptable.

Appendix 2 Photographic Depiction of Interior Container Standard

Holes, Gaps, Gouges, Protrusions (refer 5.6.2)

Repair is raised and not smooth with container surface

NOT ACCEPTABLE
Flooring has been filled with putty and has raised edges. Requires sanding

ACCEPTABLE
Section of damaged floor has been replaced.

NOT ACCEPTABLE
Repair is inadequate as a section of floor is raised and infestible material is evident.

NOT ACCEPTABLE
Previous repairs are inadequate as the repair is raised at the edges and may harbour infestible material.

Appendix 2 Photographic Depiction of Interior Container Standard

Vents (refer 5.6.3)

Vent edges with container wall

ACCEPTABLE
Vent seal is adequate.

ACCEPTABLE
Vent seal good quality.

ACCEPTABLE
Broken vent has been replaced and the replacement vent has been sealed.

Appendix 2 Photographic Depiction of Interior Container Standard

Vents (refer 5.6.3)

Sealable for the purposes of fumigation

NOT ACCEPTABLE
Vent has not been sealed - requires sealing.

ACCEPTABLE
Vent has been sealed with tape.

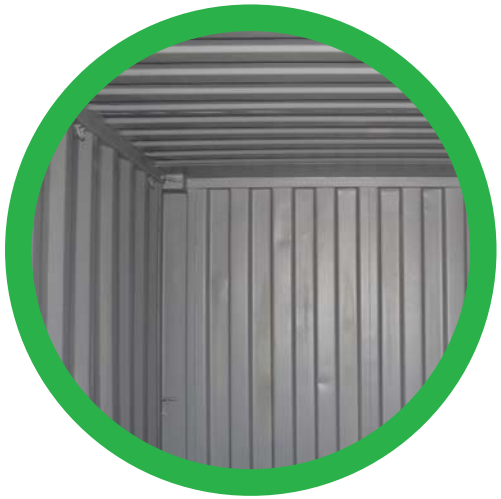
Appendix 2 Photographic Depiction of Interior Container Standard

Paint (refer 5.6.4)

Flaking Paint

NOT ACCEPTABLE
Flaking paint requires treatment and repainting.

NOT ACCEPTABLE
Flaking paint
- Requires localised treatment and repainting.



ACCEPTABLE
Freshly painted interior walls.

Appendix 2 Photographic Depiction of Interior Container Standard

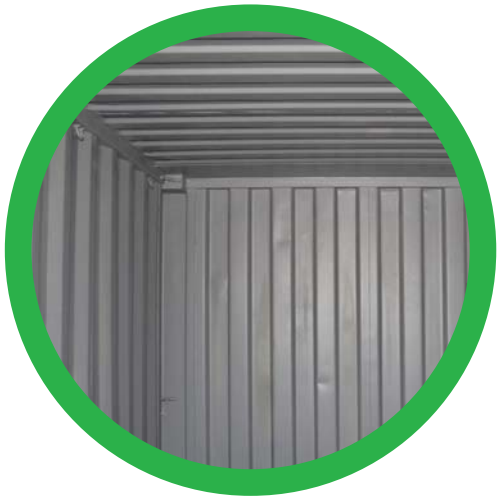
Paint (refer 5.6.4)

Blistering Paint

NOT ACCEPTABLE
Soft and blistering paint due to previous cargoes - Treat by removing soft paint, thorough cleaning and repainting.

NOT ACCEPTABLE
Blistering paint requires removal, cleaning and repainting.

NOT ACCEPTABLE
Minor blistering. Sand and assess if painting required



ACCEPTABLE
Freshly painted interior walls.

Appendix 2 Photographic Depiction of Interior Container Standard

Paint
(refer 5.6.4)

Paint has rubbed off and no longer present, exposing bare metal with no rust visible (i.e., scratches, rubbing)

NOT ACCEPTABLE
Paint failure and transferable surface rust.
Treatment required and repainting.

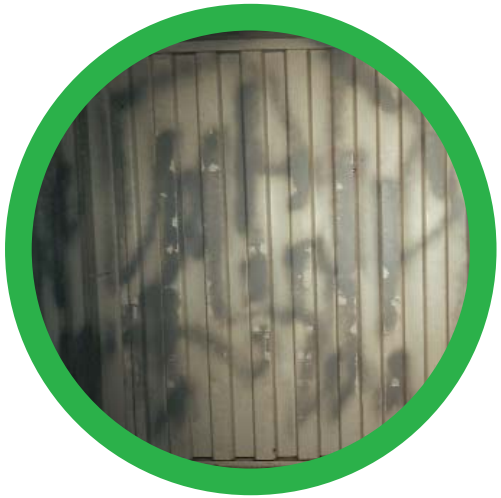
ACCEPTABLE
Fresh scratches on the wall. No loose paint.
Affected paintwork bright and sound.

ACCEPTABLE
Paint scraped off. Non-transferable rust,
wall not holed - No further action required.

Appendix 2 Photographic Depiction of Interior Container Standard

Paint (refer 5.6.4)

Top paint coat different colour than surrounding areas (mis-matched)



ACCEPTABLE
Mismatch paint, no flaking paint - appearance not critical to cargo - No further action is required. If flaking paint is observed, high-pressure wash to remove paint and dry.

Top paint coat removed, undercoat/primer visible

ACCEPTABLE
Poor appearance due to topcoat failure in places, undercoat and primer are sound.

Appendix 2 Photographic Depiction of Interior Container Standard

Rust (refer 5.6.5)

Bare Rust Visible and Non-Transferable

NOT ACCEPTABLE
Transferable rust. Treat with wire brush and clean to render non-transferable. Once the rust is Non-transferable painting is optional.

NOT ACCEPTABLE
Transferable rust. Assess and determine if cleaning will render the rust non-transferable. If satisfied then painting is optional.

ACCEPTABLE
Non-Transferable rust. If rust is not transferable - no further action required. If transferable, wire brush and paint.

ACCEPTABLE
Light surface rust non-transferable. No further action required .

Appendix 2 Photographic Depiction of Interior Container Standard

Rust (refer 5.6.5)

Bare Rust Visible and Transferable

NOT ACCEPTABLE
Extensive lower panel rust, undercoat and topcoat failure.
Requires de-rusting, priming and painting.

NOT ACCEPTABLE
Transferable rust on wall. Remove rust and assess is painting is required.

ACCEPTABLE
Non-Transferable rust. If rust is not transferable - no further action required. If non transferable, wire brush and assess if painting is required.

ACCEPTABLE
Non-transferable rust on wall.

Appendix 2 Photographic Depiction of Interior Container Standard

Rust (refer 5.6.5)

Bare Rust Visible but Not Flaky

NOT ACCEPTABLE
Extensive flaky rust is present. Requires de-rusting and assessment if painting is required.

ACCEPTABLE
Light rust that is not transferable.

Bare Rust Visible and Flaky

NOT ACCEPTABLE
Flaking paint & transferable rust. Treat with wire brushing and assess if painting is required.

ACCEPTABLE
Non-transferable rust.

Appendix 2 Photographic Depiction of Interior Container Standard

Moisture and Stains (refer 5.6.6)

Moisture or wet stain visible or apparent to the touch on any surface

NOT ACCEPTABLE
Condensation visible on the internal roof of the container. Air the container and allow to dry.

NOT ACCEPTABLE
Moist stain on the wall that is transferable. Clean and determine is repainting is required.

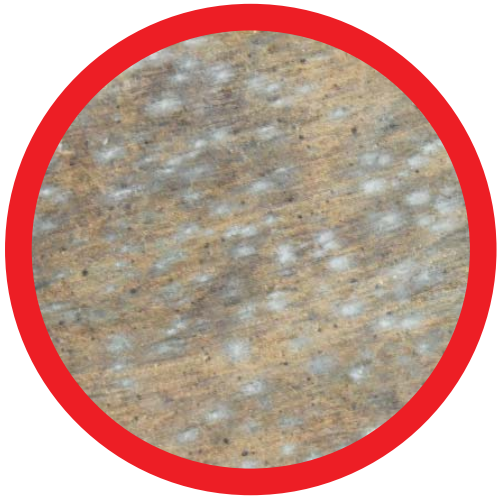
ACCEPTABLE
Light rub marks. Non-transferable.

ACCEPTABLE
Wood rub marks on wall. Non-transferable. Unsightly but acceptable.

Appendix 2 Photographic Depiction of Interior Container Standard

Moisture and Stains (refer 5.6.6)

Non-transferable rub marks



NOT ACCEPTABLE
Mould on floor. Mould visible on any surface or apparent to the touch by being able to be rubbed off must be removed by cleaning.

NOT ACCEPTABLE
Transferable stain from prior adhesive treatment must be removed.

ACCEPTABLE
Non-transferable rub marks
- no further action required.

ACCEPTABLE
Non-transferable tyre marks on wall.

Appendix 2 Photographic Depiction of Interior Container Standard

Moisture and Stains (refer 5.6.6)

Non-transferable stain

ACCEPTABLE
Non-transferable floor stains.

ACCEPTABLE
Dry stains on the floor,
Non-transferable.

Transferable stain

NOT ACCEPTABLE
Oils stain is transferable when assessed.
Remedial cleaning is required.

ACCEPTABLE
Transferable stains removed.

Appendix 2 Photographic Depiction of Interior Container Standard

Moisture and Stains (refer 5.6.6)

Non-transferable oil stain

ACCEPTABLE
Non-transferable oil stain.

NOT ACCEPTABLE
Transferable oil stain.

Transferable oil stain

NOT ACCEPTABLE
Transferable oil stains. Floor must be washed and cleaned thoroughly.

NOT ACCEPTABLE
Transferable oil stains.

Appendix 2 Photographic Depiction of Interior Container Standard

Moisture and Stains (refer 5.6.6)

Tyre marks on floor

ACCEPTABLE
Oil spots and tyre marks on the floor, Non-transferable. Gouges smooth - no further action required

ACCEPTABLE
Non-transferable tyre marks on the floor. No further action.

Tyre marks causing gouges on the floor

NOT ACCEPTABLE
Oil Spots and splintered floor. To treat container: - sand the splintered floor - edge and clean minor oil spots by washing out and drying

NOT ACCEPTABLE
Gouges on the floor require sanding.

Appendix 2 Photographic Depiction of Interior Container Standard

Residues and Contaminants (refer 5.6.7)

Presence of Previous Cargo

NOT ACCEPTABLE
Previous cargo residue.
Sweep out or wash and dry.

NOT ACCEPTABLE
Contaminant from prior cargo requires cleaning by either sweeping or washing out and drying.

ACCEPTABLE
Container has been cleaned, repainted and the floor sealed.

NOT ACCEPTABLE
Prior cargo requires cleaning.

Appendix 2 Photographic Depiction of Interior Container Standard

Residues and Contaminants (refer 5.6.7)

Infestible and Organic Material

NOT ACCEPTABLE
Lower recesses contain loose previous cargo residue. Requires scraping, and washing to remove residues and good interior clean dry.

NOT ACCEPTABLE
Gap remains after re-painting and contains infestible residue. Requires cleaning and re-sealing.

NOT ACCEPTABLE
Infestible Residue, repairs previously done in poor condition.

ACCEPTABLE
All infestible and organic material has been removed and cleaning has occurred.

Appendix 2 Photographic Depiction of Interior Container Standard

Residues and Contaminants (refer 5.6.7)

Inert or Inorganic Material that may contaminate the cargo that is wet or sticky. May or may not adhere to the container.

NOT ACCEPTABLE
Oily previous cargo, easily transferable. Requires appropriate chemical spray to dissolve oils and a good steam clean and dry.

NOT ACCEPTABLE
Adhesive is sticky and active. Requires scraping and cleaning to remove and painting if required.

NOT ACCEPTABLE
Areas of loose paint and tacky adhesive. Requires high-pressure or steam clean of adhesive and removal of all loose paint.

Appendix 2 Photographic Depiction of Interior Container Standard

Residues and Contaminants (refer 5.6.7)

Inert or Inorganic Material that may adhere to the container that is dry and not sticky. Will not transfer to the cargo to be loaded.

ACCEPTABLE
Glue residue dry, inert and non-transferable. No loose particles. No further action required. No need to sand, prime and paint.

ACCEPTABLE
Hard old stable non-offensive residues, poor appearance. Requires general clean only.

ACCEPTABLE
Inert aged non-transferable stains on wall. No further action required.

NOT ACCEPTABLE
Residue paper adhering to the roof needs to be removed and cleaning to occur.

Appendix 3 Inspection Equipment Checklist

Industry Inspection

It is suggested that at a minimum the following equipment will used to assist the inspection of a container to determine if it complies with these Standards:

• Torch	To assist in determining if residues are present in confined areas and for close-up inspection of any damaged areas. Hence it would assist if the torch is capable of being focused to a bright spot.
• A scraper	For scraping out residues and dislodging rust flakes behind which insects may be harbouring.
• A pair of tweezers	For removing residues from cracks and also for collecting larger insects found during an inspection where they are required to be collected for further identification.
• A hand lens	With at least x10 magnification for pest identification.
• Documentation	Associated with the container and the inspection.

DAWE AO Inspection

In addition to the above, if industry is to conduct an inspection either as per an AO, or as an AO, then all requirements for equipment as outlined in the DAWE Work Instruction “Inspection of empty containers ECI3001”must be observed. This includes most of the above and the additional items as listed:

- Pests of quarantine concern and pest identification information.
- Specimen jars to store pests found during the inspection.
- Tamper-evident seals to be placed on the container following the inspection where it was passed.
- Passed empty container stickers.

Appendix 4 Further Reading

DAWE Plant Export Operations Manual
http://www.agriculture.gov.au/export/controlled-goods/plants-plant-products/plantexportsmanual

DAWE Sea Container Cleaning Standards
http://www.agriculture.gov.au/import/before/prepare/sea-container-cleaning-standards

Australian Grain Industry Code of Practice for the Management of Grain along the Supply Chain
https://www.graintrade.org.au/grain-industry-code-practice

Australian Grain Industry – Code of Practice Technical Guideline Document No. 17 – Guidelines for Development of a Container Packer Operations Manual
http://www.graintrade.org.au/sites/default/files/file/Codes/Grain%20Industry%20Code%20of%20Practice/Technical%20Guidance%20Documents/TGD%20No_17%20Container%20Packer%20Manual_May2018.pdf

Convention for Safe Containers
https://www.imo.org/en/OurWork/Safety/Pages/Containers-Default.aspx

TIR Convention
https://unece.org/DAM/tir/seminar/helsinki/TIR_alltogether_Willems.pdf

Container Terminology and Glossary
https://www.csiu.co/resources-and-links/glossary-of-the-container-world

Australian Government

Department of
Agriculture, Water and
the Environment

GRAIN TRADE
AUSTRALIA