

STANDARDS FOR FOOD QUALITY SHIPPING CONTAINERS

GUIDELINES TO THE DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY – AUSTRALIA (AFFA) INSPECTION AND REQUIREMENTS

This draft has been prepared by Shipping Australia Limited, Container Technical Committee to assist the Australian Quarantine and Inspection Service in revising its 'Pink Booklet ISBN: 958 64280 X – last revised in 1998.

This booklet has been produced as a joint project by the Shipping Australia Limited, Australian Quarantine and Inspection Service, Department of Agriculture, Fisheries and Forestry – Australia, the Commonwealth Department of Transport and Communications, shipowners, depot operators, and others with an interest or involvement in food quality, general purpose, dry freight containers.

FOREWORD

This publication has been developed as a general guide and reference for all those involved in the supply, preparation and inspection of containers for the carriage of export foodstuffs.

It is not intended to supersede or override any existing regulations, only to offer simple descriptions and explanations of current AFFA requirements and inspection practices.

It covers the most common areas of concern, providing information about rules, conditions and circumstances, as well as giving reference points for further information.

The shipping industry and Government have produced this booklet in recognition of the need to clearly define the requirements for AFFA approved containers, and in response to some confusion which may, to the detriment of the exporters, shipowners and industry in general, have resulted in unnecessary costs and delays in preparing containers. This booklet is also a recognised training reference aid for inspectors and certifying officials.

This publication recognises the practicalities and economies of the container/shipping industry in Australia, and the common standards have been kept simple to apply throughout Australia. This is intended to reduce the incidence of over-servicing of containers, which not only results in additional costs the industry, but also increases environmental pollution. It is intended to clarify many of the myths and unnecessary practices associated with preparation of containers to food quality containers. It demonstrates practical areas where cost savings can be made and container turnaround times decreased to the mutual benefit of both shippers and container operators.

Readers and users of this publication should also be fully aware of the normal 'safe carriage' standards as well as any specific shipper or client requirements. While these standards are not within the scope of this publication they are important, and should be attended to, in order to ensure the future of both the Australian shipping industry and our export markets.

This guidebook has been prepared to illustrate the acceptable standards of general-purpose (GP) containers, photographically. All personnel preparing general-purpose containers for the carriage of foodstuffs should use it. The aim of this publication is to achieve a uniform interpretation of container cleanliness standards.

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.

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 containers.

This Booklet has been produced with the assistance of the Container Technical Committee of Shipping Australia Limited.

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WHY CONTAINERS REQUIRE AFFA INSPECTIONS AND APPROVALS

Containers are required under the Export Control Act 1982 to have AFFA inspections and approval if:

- the country of destination requires a phytosanitary certificate, or
- the cargo concerned is on the prescribed goods list under the Prescribed Goods (General) Orders 1985.

A Phytosanitary Certificate is a Government-to-Government certification that plants or plant products are free from infestation and those containers are suitable for that commodity. It is issued in accordance with the International Plant Protection Convention of the Food and Agriculture Organisation of the United Nations.

Basically it covers the requirements of importing nations and if these requirements are not met, problems may result, causing countries to ban Australian goods or impose other conditions or restrictions.

The onus is on the shipper to establish if a certificate is required, but information on which countries require these certificates can be obtained through offices of State Departments of Agriculture/Primary Industries.

AFFA inspections are only required at loading points. Arrangements can be made with the Department of Agriculture, Fisheries and Forestry - Australia if an inspection is required under the following Orders:

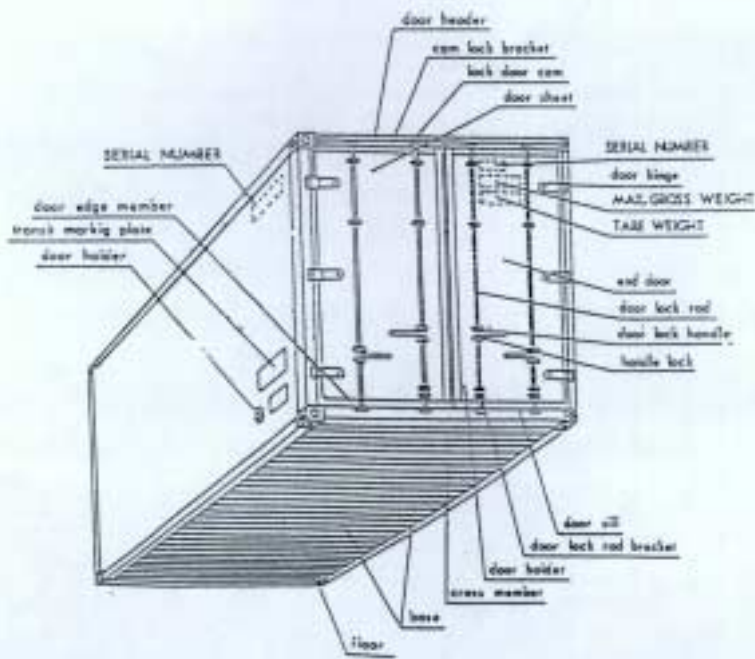
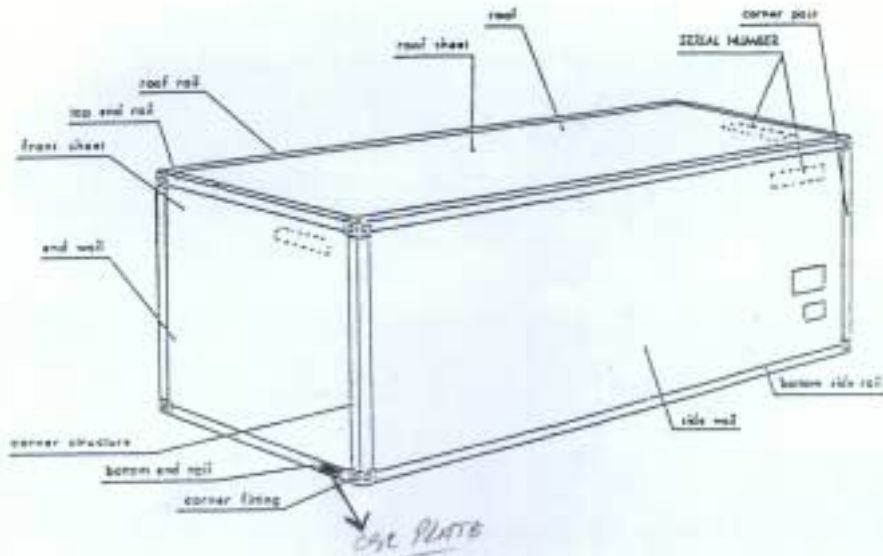
- Export Meat Orders
- Dairy Produce Orders
- Export Control (Fish) Orders
- Grain, Plants and Plant Products Orders
- Export Control (Dried Fruit) Orders
- Grains, Plants and Plant Products Orders
- Export Control (Fresh Fruit and Vegetables) Orders.

Make arrangements through the State Department of Agriculture (if applicable) for an inspection if it is required under the:

- Grains, Plants and Plant Products Orders
- Export Control (Fresh Fruit and Vegetables) Orders.

Phytosanitary Certificates should not be requested or issued for cargo insurance, quality assurance or for any other purpose other than when they are specifically required under these regulations.

CONTAINER TERMINOLOGY



WHAT THE CONTAINER SHOULD BE EXAMINED FOR

Containers must be examined in a systematic and efficient manner, taking into consideration their cargoworthiness, security, safe handling, and non-contamination or infestation of cargo.

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 insects, eggs or mould.
- paint which is cracked or flaking and will potentially contaminate the cargo
- any residue or odour from previous cargoes, from cleaning chemicals or odour-masking chemicals
- rust which is flaking or causing structural damage
- odiferous fresh or uncured paint, the solvents or odours of which may taint cargoes.
- oil stains or hydraulic fluid that has leaked from forklifts or other items of handling equipment.

The container should be cargo worthy, ie. in sound, safe and weatherproof condition fitted with good door gaskets, functional door securing & sealing components, and complying with CSC, TIR, ISO and AQIS requirements. The general external appearance is insignificant, providing the container fulfils the other criteria.

CONDITION OF CONTAINERS

EXTERIOR OF CONTAINER

The container must be weatherproof. The exterior of the container must be inspected to ascertain whether there is any significant damage that would result in the container being deemed unsuitable by way allowing entry of water, insects or contaminants, that will potentially damage the product or product packaging. The external appearance of a container has no relevance to the container's suitability.

The container should then be inspected for rust holes or damage that would permit the ingress of water or other contaminants. This could best be done from the inside of the container, no daylight to be visible from inside container when doors are shut.

All labels from previous cargo including hazardous labels and any other misleading labels must be entirely removed.

The container must be inspected to make certain that there are no substantial deformities that will limit the loading capacity of the container.

HINGES AND LATCHES

Hinges and latches must be in a good state of repair, and be easy to operate. There must be provision to insert and seal the right hand door handle.

DOOR GASKETS & SEALS

Door seals and gaskets must be intact. 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 efficient sealing. Seals can be broken or cut providing they do not allow water ingress.

INTERIOR OF CONTAINER

The interior of the container should be inspected for signs of leaks, which will be revealed as stains on the walls or roof or damp patches on the floor of the container. There should be no protrusions, projections or sharp edges which could damage the cargo (nails, bolts etc) as these could tear or chafe the packaging and cargo.

The interior walls of the container must be clean to the touch.

The floor must be free from splinters and be clean and dry to the touch. 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.

INERT CONTAMINANTS AND RESIDUES

Residues of plant material and previous cargoes should not exist in any quantity or form that could contaminate, infest, transfer or damage the cargo. There should be no debris from previous cargo, or contaminants. Most contaminants and residues may be removed by sweeping. In some instances if the residue is infestible the container may require washing or steam cleaning.

Transferable stains are to be cleaned. They have to be removed or rendered non-transferable. Non transferable stains are not classed as a contaminant and can be left as is without further treatment.

Containers with transferable oil stains are not suitable for prescribed grains. They may be used for other prescribed commodities but should be thoroughly cleaned before use or used with an approved liner.

DRYNESS

The floor must be clean and dry to the touch. No free moisture should be present on the walls or roof of a container. There should be no mould on any part of the interior of the container.

ODOURS

A harmful odour is an area that is impossible to show or quantify. Judgement of odours must be made on initial impression gained when the container door is first opened. Odours of any kind are unacceptable. If an odour is present and is not strong, objectionable or acrid it may be removed by steam cleaning. The surveyor should be aware of odours that readily dissipate upon the opening of the container, might recur when the unit is subsequently resealed, especially if it is stored in an area of high ambient temperature, eg. in a railway siding during the height of summer.

Presence of odours must be assessed immediately the doors are opened. No harmful or offensive odours allowed for Food Quality Containers (eg. Phenol, Paint, Solvent, Chlorine, Chemicals, Epoxy Resin, Disinfectant or Mustiness).

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.

Odour is generally the result of bacterial action. Use of a neutralising agent that acts on the bacteria (not a masking agent) will remove this.

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

INFESTATION

Containers should not contain or harbour any live or dead pests, insects, snails, egg larvae, droppings etc.

RUST

There should be no flaking paint or transferable rust that could stain the cargo. Rust is deemed to be excessive only if it is transferable or flaking. Surface rust is permissible. Touching-up any surface rust patches with paint could make a container unacceptable for the carriage of foods stuffs, if it emanates an odour.

The Australian Chamber of Shipping has issued the following “Fact Sheet” for the guidance of the shipping industry.



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CONTAINER CLEANLINESS STANDARDS

As a general guide and ease of reference to all those involved in the transport chain, the Australian Chamber of Shipping has categorised the standard of cleanliness required for the carriage of various cargoes into four basic groups. This guide has been formulated in consultation with various industry organisations to achieve national uniformity for cleanliness standards suitable for the carriage of cargo.

GRADE	CRITERIA	COMMODITIES
FOOD CONTAINER (FC) (Including DPI Grade)	No Taint No Flaking Paint No Interior Transferable Stains Clean & Dry Floor No Cargo Residue No Infestation	Dried Fruit Flour Grain/Peas/Cereals Rice
CLEAN CONTAINER (CC)	No Obnoxious Odours No Flaking Paint No Transferable Internal Rust No Transferable Floor Stains Clean & Dry Floor No Cargo Residue No Infestation	Milk Powder Canned Fruit Personnel Effects Pet Food Bulk Food Commodities - (with fitted liner)
GENERAL CARGO (GC)	No Cargo Residue Dry Floor Normal Wear & Tear Acceptable	General Cargo Cotton Steel Machinery Tyres
MULTI PURPOSE CONTAINER (MC)	No Cargo Residue Cargo Worthy Suitable for carriage of non-sensitive Cargo. Includes containers prepared with linings and absorbent material.	Hides Bone Meal Bagged Chemicals Scrap

All containers should be cargo worthy, ie. in sound, safe and weatherproof condition fitted with good door gaskets, functional door securing & sealing components, and complying with CSC, TIR, ISO and AQIS requirements. The general external appearance is insignificant, providing the container fulfils the other criteria.

All those involved in the transport chain are also guided by the existing regulations and current Department of Primary Industries & Energy (DPIE) regulations and inspection criteria indicated in the DPIE booklet, *Standards – For Food Quality Shipping Containers*.

Condition - Guidelines

Exterior	To be weatherproof. No daylight to be visible from inside container when doors shut. No labels from previous cargo.
Hinges and Latches	To be in a good state of repair, and to be easy to operate.
Door Gaskets	To be pliable and weatherproof. The surfaces they seal should be smooth and free of excessive rust or scale build-up.
Interior	No protrusions, projections or sharp edges which could damage the cargo (nails, bolts etc). Walls to be clean to touch. No flaking paint and no excessive rust for FC & CC categories. Floor free from splinters. For some cargo, floor stains may be covered with paper or lining. Deformities, which limit the loading capacity not, allowed.
Cargo Residue	Residues of plant material and previous cargoes should not exist in any quantity or form that could contaminate, infest, transfer or damage the Cargo. No debris or mould allowed.
Dryness	For FC, it may be appropriate to sweep and vacuum the container, rather than water or steam clean unless sufficient time is available to ensure dryness. The floor must be clean and dry to the touch. No free moisture should be present on the walls or roof of a container.
Odour	To be assessed immediately the doors are opened. No harmful or offensive odours allowed for FC (eg. Phenol, Paint, Solvent, Chlorine, Chemicals, Epoxy Resin, Disinfectant or Mustiness). 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 24 hours later). Except for recently painted containers, most odours emanate from the wooden floor due to spillage of previous cargo or microbial action on substances in the wood. Mustiness is accelerated by moisture and warm temperature.
Infestation	Containers should not contain or harbour any live or dead pests, insects, snails, egg larvae, droppings etc.
Rust	Surface rust is permissible, unless if it is transferable or flaking.

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CONTAINER CLEANING

One or more of the following cleaning methods may be used to upgrade a container to a food quality standard.

- ♦ Dry sweep out
- ♦ Vacuuming
- ♦ Spreading absorbent powder and then sweeping out and/or vacuuming
- ♦ Low pressure water wash – utilising cold water without using any cleaning agent
- ♦ Scraping, sanding disc or wire brush ¹
 - High Pressure water wash ²
 - Cold water wash with or without a specific cleaning agent
- ♦ Hot water wash with or without a specific cleaning agent
- ♦ Steam cleaning with or without specific cleaning agent ³
- ♦ Solvent cleaning ⁴
- ♦ Fumigation

NOTE There are advantages and disadvantages in each cleaning method.

¹ 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.

² Hot water washing will generate heat, which may result in strong and irritating vapours being given off; these may affect the containers and/or the cargo.

³ Temperatures of 150 ° may be reached during steam cleaning that could cause the paint to peel, and affect bonding of ply floors.

⁴ The treatment of mould on the internal surfaces of containers may require spray application of fungicides, this may result in persistent odours and adverse reactions with the cargo to be carried. 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. These regulations may require the approval of the relevant authority if substances, which are generally recognised as ‘not safe’, are likely to come into direct or incidental contact with a food product, or there is a possibility that the substance may contaminate the food.

When water (hot or cold) is utilised to clean containers, it is imperative that these containers are adequately ventilated (with the doors open) and dried prior to use. In some instances a sweep out and clean may be more appropriate instead of washing with water, especially when containers are required for use immediately, without delay.

PAINTS AND CLEANING PRODUCTS

It is essential for commodities, which come into contact with the container, such as grains, that the container does not increase the risk of contaminating the commodity with paints or cleaning products.

Paints

Under the Export Control Act 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 either section 175300 of the US Food and Drug Administration (FDA) Regulations or have been tested by the occupational hygiene unit of the North of England Industrial Health Service.

Paint manufacturers can provide evidence of compliance with these standards.

NOTE: Painting may not always be the solution to overcoming container surface irregularities for short term benefits, as there can be numerous long term deleterious effects caused by 'quick-fix' painting.

Some paints may generate odours, which are harmful to the cargo being carried and lead to taint. This is especially applicable to fresh or uncured paint. Problems may also arise by the incompatibility of paints used to touch-up, leading to other related problems, eg. flaking and/or blistering.

Overspray is not a problem as long as it conforms to the above mentioned criteria.

Note: - Overspray is when panels around the affected areas are painted.

Cleaning Products

Under the Export Control Act there is no regulatory requirement specifying the type of cleaning agents to be used. However, it is highly recommended that the cleaning agents used appear on the list of chemical agents acceptable for use at establishments registered to prepare goods prescribed for the purposes of the Export Control Act 1982 published by the Australian Government Publishing Service.

There are many modern cleaning equipment and agents that are very effective in the use of removing odours, stains, loose material and oily residues. In most instances a simple sweep-out or a water wash may suffice.

NOTE: Some solvents may produce odours that will taint cargoes.

FLOOR SANDING

The practice of full floor sanding has become fairly common in Australia. It 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. It is also being promoted as a method of cleaning the container instead of washing *etc.* when there is a doubt that the container will dry sufficiently, and quickly enough, for loading.

Apart from the cost, indiscriminate and unnecessary sanding of floors can have adverse effects on containers in both the short and long 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, good skills are required to control the cutting and to prevent deep grooving in those areas where the machine is slowed, (or) reversed or changed direction; This can cause additional damage. Sanding across the grain can tear and dislodge the fibres causing loose slivers and splinters 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.

It is to be noted that,

1. Any remedial treatment is usually far less effective than the original coatings
2. Some (Most) floors have a protective surface coating designed to facilitate cleaning and to prevent the absorption of contaminants or oils. When this is removed the flooring becomes even more vulnerable to damage and contamination and therefore (although most leasing companies do not now require its re-instatement) requires greater attention subsequently.

Common sense cleaning practices using detergent or solvent assisted washing, scrubbing or absorbent practices will remove or neutralise most oils or contaminants without 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.

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.

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.

COSMETIC PAINTING OF CONTAINER INTERIORS

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

Once a container leaves the factory, carries all types of cargoes and is subjected to normal wear 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. The re-spraying or painting of interiors is also a practice commonly undertaken in order to improve the interior condition of the containers and to cosmetically enhance their appearance. This is undertaken under various terms referred to as 'food upgrades, interior sand and touch up, mist coating, or food preparation.'

One should be aware that the following consequences could arise due to cosmetic painting of container interiors:

- ❖ The paints used contain solvents and chemicals which can cause tainting and contamination problems to future cargoes and which may take a long time to properly cure.
- ❖ If the correct cleaning, preparation and application of a compatible paint is not right it will fail very rapidly and the container will 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.
- ❖ Over-spray or spillage onto sealant, seals or flooring can be a problem and affects the container appearance and at times transferable.
- ❖ In some cases where partial touch ups and mismatches are done the appearance of the container is made worse than original and the contrasting paint surfaces appear worse than they are. The system can compound itself next time around when another touch up is required to correct the poor impression made by the previous touch up.

Any painting carried out to improve the condition of the container and its suitability to carry food or grain must be effected in a correct manner. The poor surface should be sanded back and undercoat applied followed by topcoat. A suitable time should then be allowed, before use, to enable the paint to cure and for the dissipation of any fumes generated.

It should be noted that any up-grade etc must be approached and effected in a professional manner and not applied as 'a quick fix cover up.'

ACCEPTABILITY OF DISPOSABLE 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.

AFFA inspectors will accept linings on condition that the normal standards set for the carriage of the prescribed goods are met, and that the liner is not being used to mask normally unacceptable features.

Linings are generally acceptable for stained floors, as they provide protection, prevent transference of stains and avoid costly floor sanding and other treatments, which in many cases are expensive, and often only a cosmetic enhancement.

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 Australian Standards AS 2070 and AS 2171 - 1992.

Liners fitted before inspection will be moved to ensure that they do not conceal unacceptable features, in particular pests and infestible residues, or damage allowing the entry of pests.

It should be noted that unnecessary time wastage and expense would be avoided if the container were inspected prior to the fitting of liners and/or their associated fastening devices.

Myths

The following are some of the myths and suppositions, which abound, in the industry. These should be completely disregarded.

- ♦ **Only specific brands of paint are acceptable**
- ♦ **Odours remain in containers and nothing will eradicate them. It depends on extent and type of odour / contamination.**
- ♦ **Plank floors are unsuitable for food quality containers**
- ♦ **When flaky paint is removed the surface must be repainted**
- ♦ **Long trips by road and rail downgrade the containers**
- ♦ **Every shipper and packer has a different standard at present, however AQIS does not. This is the reason for this new book.**
- ♦ **Some paint colours are more acceptable than others**
- ♦ **Liners are not acceptable in certain overseas countries**

General Standards

For prescribed grains: wheat, oats, barley, sorghum, dried field peas, mung beans, canola, soy beans, and whole or split lupins, chick peas, faba beans, lentils and vetch.	Fault	Problem	Action
	Residues of plant material	Provides food and breeding places for insects and diseases	Remove and destroy under quarantine
	Live pests such as insects, mites, snails etc.	May damage cargo and be a pest to importing countries	Treat by fumigation or spraying (by competent Personnel). Remove dead pests
	Holes in walls or roof; poorly fitting doors	May allow entry of water or pests and loss or damage of cargo	Repair so that container can be properly sealed
	Damaged wall linings (panels)	Could harbour pests or residue of plant material	Examine carefully for pest/residues. Repair after inspection by AFFA Officer
	Wet container	Cause damage to cartons or grain	Dry the container out by airing or heating
	Vents	May allow entry of pests	Cover with tape or fine gauze
	Residues of minerals or other contaminant material	May contaminate prescribed grains	Remove for bulk cargo. Remove or line the container for bagged cargo
For prescribed dried fruit	Fault	Problem	Action
	Residues of plant material	Provides food and breeding places for insects and disease	Remove and destroy under Quarantine supervision
	Live pests such as insects, mites and snails	May damage cargo and be a pest to importing country	Treat by fumigation or spraying (by competent personnel). Remove dead pests
	Holes in wall or roof; poorly fitting door	May allow entry of water or pests and loss or damage to cargo	Repair so that container can be properly sealed
	Damaged wall linings (panels)	Could harbour pests or residue of plant material	Examine carefully for pests/residues. Clean thoroughly and provide suitable lining material, or repair, after inspection by AFFA officers
	Odours and taints	Tainting of commodity	Air and clean and remove odour
	Wet container	Causes damage to cartons, resulting in tainting	Dry the container out by airing or heating

For other goods needing a phytosanitary certificate

<u>Fault</u>	<u>Problem</u>	<u>Action</u>
Residues of plant material such as grain seeds	Provides food and breeding places for insects and diseases	Remove and destroy under Quarantine supervision
Live insects, mites, snails etc.	May damage cargo and be a pest to importing country's authorities	Treat to kill by fumigation or spraying by competent personnel Remove dead pests
Holes in walls, floor, or roof; poorly fitting doors	May allow entry of water or pests and loss or damage of cargo	Repair so that container can be properly sealed
Damaged wall linings (panels)	Could harbour pests or residues of plant material	Examine carefully for pests/residues. Clean thoroughly and provide suitable lining material or repair after inspection by AFFA

For milk powder and any other dry dairy produce

<u>Fault</u>	<u>Problem</u>	<u>Action</u>
Residues of previous cargo	Soiling or marking of packages	Sweep out
Damage/holes in roof walls; poorly fitting doors	Entry of water leading to damaged packaging and rusting of cans	Repair so that container can be properly sealed
Chemicals stains/spills	Soiling or tainting of commodity	Clean thoroughly or provide suitable liner
Odours and taints	Tainting of commodity	Air and clean to remove odour
Wet containers	Cause damage to cartons which can also cause odours and tainting	Dry the container out by airing or heating

**For goods in cans: meat,
dairy, fish**

<u>Fault</u>	<u>Problem</u>	<u>Action</u>
Residues of previous cargoes	Soiling or marking of packages	Sweep out
Damage/holes in roof, walls; poorly fitting doors	Entry of water leading to damaged packaging and rusting of cans	Repair so that containers can be properly sealed
Stains/spills	Soiling of cartons	Clear to the extent necessary
Odours		No action needed for AFFA
Indelible stains/marks		No action needed for AFFA

8 January 1999

INDUSTRY ADVICE NOTE 1999/8

CONTAINER LINERS AND EMPTY CONTAINER INSPECTION

Many areas are experiencing a shortage of 'grain grade' shipping containers. To address this problem the Grains Program have, at the request of industry, recently assessed the use of liners to upgrade containers.

Such containers must pass a "P" Plant product level inspection. The correct and appropriate use of a liner may overcome superficial problems such as flaky paint, light rust, transferable stains but not odour.

The liners we have been requested to assess fall into two categories, pre-fabricated cardboard liners and bladder style woven polypropylene liners.

Pre-fabricated liners:

The liners are considered suitable if correctly installed. The liner needs to be assembled progressively with loading, therefore correct installation needs to be monitored to ensure the liner effectively negates defects such as oil, rust and flaking paint. As the liner is constructed progressively it is suitable only for bagged products.

Bladder style woven liners:

The liners may be installed at the time of inspection, the container may be sealed and loaded at a later date with bulk commodities. Please note that woven liners have a limited capacity to prevent transfer of moisture, hence they may be considered an effective barrier for light oil stains only.

All accredited empty container inspectors are authorised to upgrade a container from Plant grade to Prescribed grain grade, the upgrade should be reflected accordingly on the Empty Container Inspection Record, in the comments column. After the appropriate liner is fitted the Declaration of Inspection (DOI) issued by the accredited inspector should state that the container meets the 'G', Prescribed grain standard. Please bear in mind that the container should still be inspected in accordance with Empty Container Inspection checklist and that once installed the fully lined container must meet **all** criteria for transport of prescribed goods.

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CLEANLINESS INSPECTION CRITERIA

Shipping Lines have accepted that repairs will be carried out to bring containers to a suitable cleanliness standard, by their nominated deports automatically on **all** containers detected with the following:

COMPONENT	CONDITION
Interior and Exterior	Labels, including hazardous cargo labels Contamination Tape over ventilators Paint attack due to corrosive cargoes or spillage
Interior, including walls, ceiling and floor	Organic cargo residues, <i>eg.</i> beans, grain, etc., within the floor cracks between floor boards or within sidewall corrugations Materials (other than normal dust and dirt) stuck to caulking Debris or dunnage in excess of what would normally remain after a sweep out. Transferable stains, mould or fungus (except tyre marks) Loose or not fully adhered tape or other material Patch (of any size) of <i>sticky-glue</i> , including sticky tape and any sticky adhesive residue Infestation (Except non- transferable mould) Persistent odour Condensation or standing water Cargo securing devices, <i>eg.</i> metal/wire straps, cables, chains, rope, etc., left on bars, rings, walls, ceilings floors etc. Graffiti
Exterior	Graffiti Spillage on exterior that renders the markings required by regulation illegible.

CONTAINER EXTERIOR - LABELS

NOT ACCEPTABLE



All labels (including hazardous) from previous cargo must be completely removed.

NOT ACCEPTABLE



All labels (including hazardous) from previous cargo must be completely removed.

NOT ACCEPTABLE

All labels (including hazardous) from previous cargo must be completely removed.

NOT ACCEPTABLE

All labels (including hazardous) from previous cargo must be completely removed.

STRUCTURAL FAULTS

NOT ACCEPTABLE



Exterior/interior surface corrosion does not mean that the unit is unsuitable, as long as the seals are intact sound and tight. Although not visible small rust holes were detected at the bottom of the door.

NOT ACCEPTABLE



Corroded threshold plate. Threshold plate requires descaling and painting full area and general cleaning before acceptance.

NOT ACCEPTABLE

Container badly dented, with corrosion leading to side- wall being holed.

NOT ACCEPTABLE

Improper repair.

NOT ACCEPTABLE



Door seal broken. Bottom of door badly corroded.

NOT ACCEPTABLE



Improper repair.

ACCEPTABLE

Surface corrosion at bottom of door – Seal is intact. No further action needed.

ACCEPTABLE

Rust blisters on the bottom section of the door. No holes – no further action required.

ACCEPTABLE

The slight deformation of the corner post has not affected its strength to limit loading capacity. Acceptable door seal repair container is cargo worthy.

ACCEPTABLE

Exterior/interior surface corrosion does not mean that the unit is unsuitable, as long as the seals are intact sound and tight.

ACCEPTABLE

Exterior condition of the container has no bearing on cargo worthiness so long as the container is in a weatherproof condition.

ACCEPTABLE

Door bottom surface rust. Unit light and weather tight – no further action required.

DOOR SEALS AND GASKETS

NOT ACCEPTABLE



Door Bottom Seal not sealing – Requires repair prior to being considered acceptable.

NOT ACCEPTABLE



Top door outer seal cut – ascertain whether light and weather tight – repair.

ACCEPTABLE

Acceptable door seal repair – container is cargo worthy.

ACCEPTABLE

Cut bottom outer door seal. Light and weather tight – no further action required.

ACCEPTABLE

Door seal must form a light and weather tight seal.

ACCEPTABLE

Door seal must form a light and weather tight seal.

CONTAINER INTERIOR – STAINS, PAINT, RUST & RESIDUE

NOT ACCEPTABLE



Steel dividing strips in flooring are rusty and flooring damage has loose splinters.

ACCEPTABLE AFTER REPAIR



Flooring has been filled in with putty. It will be sanded and exposed steel will be treated.

STAINS

NOT ACCEPTABLE



Oil Spots and splintered floor. Before the container is deemed acceptable, sand the splintered floor - edge and clean minor oil spots by washing out and drying.

NOT ACCEPTABLE



Transferable oil stains. The container is not acceptable in this condition.

NOT ACCEPTABLE

Transferable oil stains. The container must be washed and cleaned thoroughly prior to being deemed acceptable.

NOT ACCEPTABLE

Tyre residue - wash clean to render non-transferable prior to and

NOT ACCEPTABLE

Mud stains to be cleaned by washing out and drying. Non-transferable tyre marks – no further action required.

ACCEPTABLE

Non transferable rub marks and tyre marks – No further action required.

ACCEPTABLE

Rub marks – no further action required.

ACCEPTABLE

Gouges to bare metal, no rust, non-transferable rub marks, metal wall not pierced – Container acceptable in current condition, no further action required.

ACCEPTABLE

Non-transferable floor stains – no further action required

ACCEPTABLE

Oil spots and tyre marks on the floor – non-transferable. Gouges smooth – no further action required.

ACCEPTABLE

Oil spots and Tyre marks – non transferable – no further action required

ACCEPTABLE

Dry stains on the floor – non-transferable – no further action required (such as spot sanding).

NOT ACCEPTABLE

Centre 'tophat' sections rusty, flooring badly stained but sound (before treatment).

TREATMENT

Sand very lightly; centre strip cleaned and painted. Container is then to be steam cleaned and dried to make it suitable to carry foodstuff.

CONTAINER INTERIOR – MOISTURE & MOULD

NOT ACCEPTABLE



Mould must be cleaned prior to acceptance.

NOT ACCEPTABLE



Wet floor dry out thoroughly – Stained wall non-transferable, no further action required.

NOT ACCEPTABLE

Wet floor – requires to be dried out thoroughly. Unless the rust on exposed steel flaky, loose and transferable, no further action is required. – If rust is transferable, wire brush and clean to render non-transferable – can either be painted or leave as it is, when the rust is non-transferable.

NOT ACCEPTABLE

Wet floor, dry out – non-transferable stains – no further action required.

RUST

NOT ACCEPTABLE



Loose transferable rust – wire brush and paint.



Transferable rust – wire brush and clean to render non-transferable – can either be painted or leave as it is, when the rust is non-transferable.

NOT ACCEPTABLE

Loose paint – transferable rust. Requires only localised wire brushing and painting.

NOT ACCEPTABLE

Substandard old repair, loose corrosion and blistered paint. Requires only local descaling and painting.

NOT ACCEPTABLE

Extensive lower panel corrosion, undercoat and topcoat failure. Requires de-rusting, priming and painting.

ACCEPTABLE

Non-transferable rust – no further action required.

ACCEPTABLE

Non-transferable rust – no further action required.

ACCEPTABLE

If rust is not transferable – no further action required. If transferable, wire brush and paint.

PAINT

NOT ACCEPTABLE



Flaking paint can harbour insects/previous cargo residues. Clean, wire-brush and paint.

NOT ACCEPTABLE



Soft and blistering paint due to previous cargoes. Requires removal of soft paint, good clean and repaint.

NOT ACCEPTABLE

Pint failure and mild surface corrosion. Requires hot high pressure washing or other form of de-rusting effected areas and repainting.

NOT ACCEPTABLE

Multiple areas of primary and secondary paint failure. Requires removal or treatment of effected paintwork and repainting.

NOT ACCEPTABLE

Loose and blistering paintwork. Requires localised treatment and repainting.



Large areas of paint failure and powdery rust. Requires localised de-rusting and painting.

ACCEPTABLE

Paint rubbed off on roof – no further action required.

ACCEPTABLE

Non-transferable rub marks – no further action required.

ACCEPTABLE

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

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.

ACCEPTABLE

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

ACCEPTABLE

Interior paintwork appearance poor due to previous touch-ups and mismatch paint.

ACCEPTABLE

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

RESIDUE**NOT ACCEPTABLE**

Transferable black residue – remove, clean and paint.

NOT ACCEPTABLE

Transferable rub marks – clean to render non-transferable – no need to paint over.

NOT ACCEPTABLE

Transferable black residue – remove, clean and paint.

NOT ACCEPTABLE

Glue residue – sticky and transferable. Remove and paint.

NOT ACCEPTABLE

Glue residue – sticky and transferable. Remove and paint.

NOT ACCEPTABLE

Loose, transferable white powder on wall (previous cargo residue) – wash out and dry.

NOT ACCEPTABLE

Previous cargo residue – Sweep out or wash and dry.

NOT ACCEPTABLE

Grain white powder residue – wash only if residue cannot be swept out.

NOT ACCEPTABLE

Dirty floor with fresh transferable oil stains. Requires only spot sanding or detergent cleaning to remove surface oil and good general clean.

NOT ACCEPTABLE

Cargo residue and some fresh oil spots n floor and perimeter. Requires only a good steam clean or high-pressure wash and dry.

NOT ACCEPTABLE

Oily previous cargo, easily transferable. Requires appropriate chemical spray to dissolve oils and a good steam clean and dry.

NOT ACCEPTABLE

Lower recesses contain loose previous cargo residue. Requires scraping, and washing to remove residues and good interior clean 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.

ACCEPTABLE

Non-transferable residue from previous cargo – No further action required.

ACCEPTABLE

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

ACCEPTABLE

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

ACCEPTABLE

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

ACCEPTABLE

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

ACCEPTABLE

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

NOT ACCEPTABLE

Transferable stains on wall. Stains removed with localised washing and cleaning.

ACCEPTABLE AFTER TREATMENT

Container after treatment.

NOT ACCEPTABLE

Roof contains adhesives, which are transferable and tacky. Container washed and cleaned.

ACCEPTABLE AFTER TREATMENT

After cleaning, total removal of marks not achieved. Remaining contaminants principally, inert and minimal and non-transferable. Container now suitable for carriage of foodstuffs.

CONTAINER SUITABILITY FOR FITTING LINERS

NOT ACCEPTABLE



Splinters and debris – remove debris, sand down rough edges and make prepare surface smooth.

ACCEPTABLE



Interior panels gauged, non-transferable rusty stains. No action required as a liner is to be fitted to the container.

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Interior panels gauged, non-transferable rusty stains. No action required as a liner is to be fitted to the container.

ACCEPTABLE

Floor and wall marked with, non-transferable rust and oil stains. No action required as a liner is to be fitted to the container.

ACCEPTABLE

Burnt paint non-transferable. No action required as a liner is to be fitted to the container.

ACCEPTABLE

Wall with non-transferable stains. No action required as a liner is to be fitted to the container.

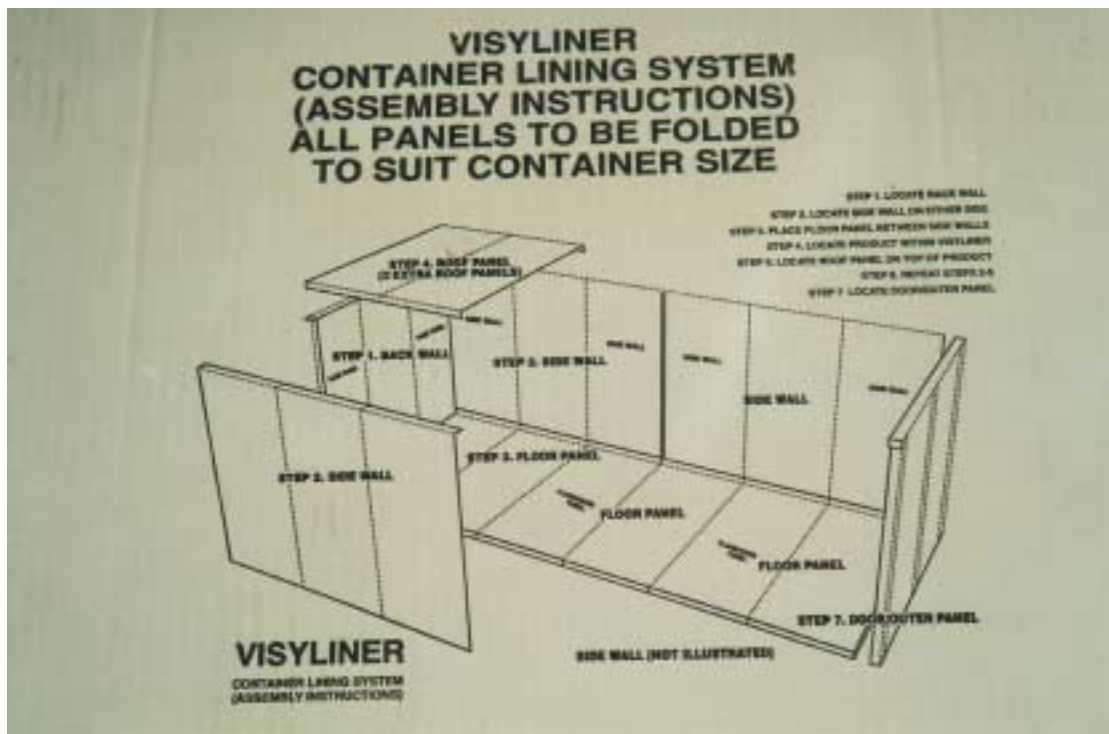
ACCEPTABLE

Floor and wall marked with, non-transferable rust and oil stains. No action required as a liner is to be fitted to the container.

FITTING OF CARDBOARD LINERS







**THIS PICTURE MUST BE RE-DRAWN WITH
REFERENCE TO VISY LINERS ERASED.**

FITTING OF FULL OR PARTIAL POLYETHYLENE LINERS





