

STANDARDS

for

FOOD QUALITY

SHIPPING CONTAINERS

GUIDELINES
TO THE AUSTRALIAN
DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY'S
CONTAINER CERTIFICATION REQUIREMENTS

This revision of the 2001 edition has been prepared by Shipping Australia Limited, Container Steering Group to reflect regulatory changes and industry developments.

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 guide has been developed as a general reference for all those involved in the supply, preparation and inspection of dry 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 Australian Department of Agriculture, Fisheries and Forestry (DAFF) - Biosecurity requirements for 'DAFF Level 2' phytosanitary certification 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 has produced this booklet to clarify the requirements for DAFF approved containers and to minimise any confusion which imposes unnecessary costs and delays in preparing containers which is ultimately detrimental to exporters, shipowners and the competitiveness of the industry as a whole. This booklet is also recommended as a training reference aid for inspectors and certifying officials.

The practicalities and economies of the container shipping industry in Australia require that common standards are kept simple and are easily communicated so to encourage acceptance and use throughout Australia. One intention of this guide is to reduce the incidence of over-servicing of containers which results in unnecessary costs to industry and the environment. It also intends to clarify many of the myths and unnecessary practices associated with preparing food quality containers. By demonstrating practical areas where cost savings can be made and container turnaround times reduced the guide aims to benefit of both shippers and container operators.

Readers and users of this publication should also be fully aware of any specific shipper or client requirements and also all of the requirements for 'Safe Containers' outlined in Marine Order 44. Legislated standards for safe containers will be referred to where instructive but the focus of the guide is to address the more specific requirement of preparing food quality containers.

The guide has been prepared to illustrate the acceptable standards of food-quality (FQ) containers photographically. 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.

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.

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WHY CONTAINERS REQUIRE DAFF INSPECTIONS AND APPROVALS

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

- The country of destination requires a phytosanitary certificate, or
- 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 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 container 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.

The onus is on the shipper to establish if a certificate is required for their exported commodity by the destination country. This information is easily accessible from the online database maintained by DAFF, MICOR the 'Manual of Importing Country Requirements' <http://www.daff.gov.au/micor>.

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

Approved Arrangements

Container inspections and certification can be performed by parties other than Australia Quarantine Inspection Service (AQIS) personnel. Companies are able to establish procedures based on 'Approved Arrangements' outlined by AQIS that enable them to undertake part or full responsibility for meeting an export commodity's phytosanitary requirement. Part responsibility can include the certification of shipping containers' compliance with DAFF export standards. To enable a company employee to inspect and certify containers DAFF provides specific training for individuals to be accredited as Authorised Officers.

Under an Approved Arrangement the company gives AQIS specific assurances that procedures are implemented that ensure phytosanitary outcomes are achieved. The procedures need to be approved by AQIS and are auditable. Record keeping which documents compliance with the arrangement is a requirement. Audits are conducted by AQIS in a variety of forms and sanctions for non-compliance range from suspension to cancelation and possible prosecution.

What the Container Should be Examined For

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

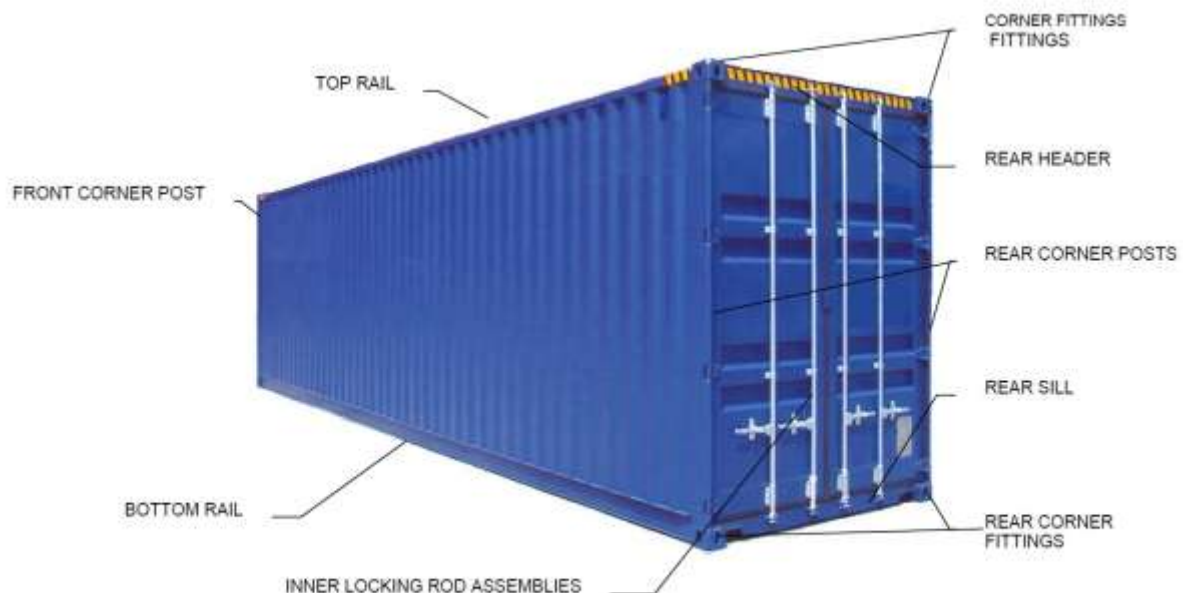
Things to look for when examining a container include:

- 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 - not to be mistaken with condensation
- 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
- Odorous fresh or uncured paint, the solvents or odours of which may taint cargoes.
- Transferable stains such as oil or hydraulic fluid that has leaked from forklifts or other items of handling equipment

EXTERNAL

The container should be cargo worthy, ie. in sound, safe and weatherproof condition fitted with adequate 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.

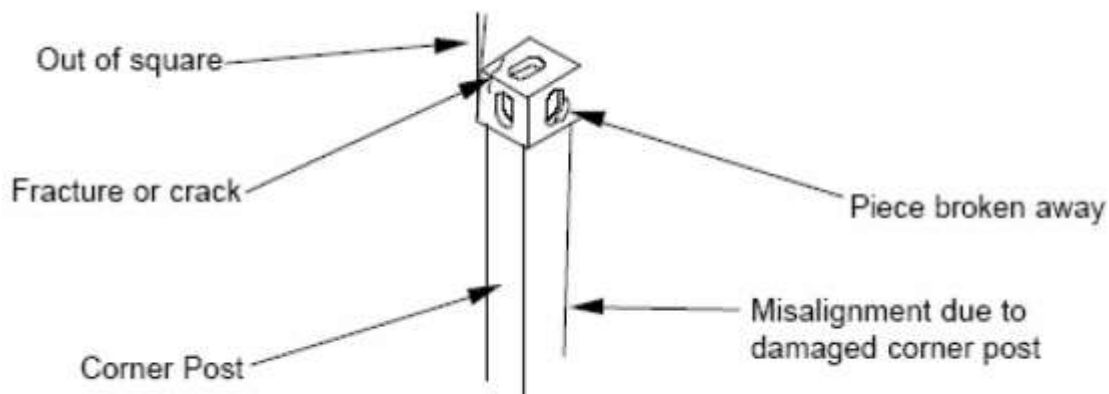


Source: IMO, Ref. T3/1.01, CSC.1/Circ.138, June 2010.

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. This inspection is a separate process from the focus of this guide but should be consider when preparing containers for export. See fact sheet for more details.

Containers must be weatherproof and should have no holes in walls or roof. Holes that may allow entry of water, insects or contaminants that can potentially cause damage to the goods being exported. An efficient method of detecting holes is to look for light infiltration from inside the closed container.

Particular attention should be paid to the corner castings as they can be damaged by twist lock action. Corner castings must have no holes or piercing that would permit the ingress of water, insect pests or contaminates.



Source: Guide to Convention for Safe Containers, (Cassner, 2006)

Rust

Rust is not reason for container failing inspection but excessive rust can result in holes and cracks. Excessive rust can eventually give rise to structural weakness.

NOT ACCEPTABLE



Small Rust holes in the bottom of the door

ACCEPTABLE



Surface rust is light; container is in a weatherproof condition

Doors Gaskets & Rubber 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.

ACCEPTABLE



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

NOT ACCEPTABLE



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

ACCEPTABLE



Adequate door seal repair – container is cargo worthy.

NOT ACCEPTABLE



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

Labels

All labels from previous cargo must be removed.

NOT ACCEPTABLE



INTERNAL

Walls

The interior of the container should be checked for signs of leaks, which will be revealed as stains on the walls or roof or damp patches on the floor of the container.

Holes and gaps in doors seals which could allow pest to enter are not acceptable and can be identified most easily as light incursions from inside with the doors closed.

ACCEPTABLE



Door seal must form a light and weather tight seal.

Any protrusions, projections or sharp edges which could damage the cargo (nails, bolts etc.) must be removed as these could tear or chafe the packaging and cargo.

NOT ACCEPTABLE



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

NOT ACCEPTABLE



Sharp edges around patch repair.

Floor

Floors must also have no splinters, gaps between floor boards and be examined for stains.

NOT ACCEPTABLE



Flooring damage has loose splinters and steel dividing strips in flooring have flaking rust.

REPAIRING – ACCEPTABLE



Flooring has been filled in with putty. It will be sanded followed by treatment of exposed steel.

NOT ACCEPTABLE



L. Centre 'tophat' sections rusty, flooring badly stained but sound.

R. Very light sanding centre strip cleaned and painted.

Container is then to be steam cleaned and dried.

TREATMENT



CONTAINER CLEANLINESS STANDARDS

The following table is an excerpt from the SAL fact sheet “Dry Container Cleanliness Standards”. The Food Quality and General Cargo categorises in this table align with DAFF container certification standards for DAFF Level 2 and Level 1 respectively. Integrating these regulations into the four grades of the single industry standard covering all dry containers reduces the complexity and confusion created with multiple grades or class listings.

GRADE	Container Criteria	Commodity Description	Commodity Examples
FOOD Quality (FC) DAFF Level 2	No Obnoxious odours No Flaking paint or rust No Transferable stains or rust No Infestible material	Prescribed goods: Consumable (edible) plant products.	<ul style="list-style-type: none"> · Grain* · Mung beans · Rice · Hay and Straw
GENERAL Cargo (GC) DAFF Level 1	Clean & dry floor /No Cargo residue No Infestation	Prescribed goods: Non-consumable plant products.	<ul style="list-style-type: none"> · Timber products · Cotton lint · Tin & Packaged food
FLEXITANK (FT)	Compliant with Container Owners Association– Code of Practice	Non-hazardous liquid cargo	<ul style="list-style-type: none"> · Wine · Fruit juice · Vegetable oil
SCRAP Cargo (SC)	Fit for purpose - Cargo worthy No structural weakness Normal wear & tear acceptable Interior panels with heavy abrasions / corrosion acceptable	Non-Prescribed goods: Cargo not requiring phytosanitary certification.	<ul style="list-style-type: none"> · Steel products · Scrap metal · Hides*

*Refer to specific SAL fact sheet

The DAFF levels are the mandated standard of container cleanliness required for exporting prescribed products from Australia.

Shippers exporting non-prescribed goods should use this industry standard to choose which of the four container grades is the most suitable based on their market requirements. It must be noted that exporting commodities in containers of higher standard than is necessary is an inefficient use of resources, reduces availability and leads to significantly higher costs.

The criteria for cleanliness of Food Quality containers are additional to those required for General Cargo containers. Examples of the criteria for Food Quality certification of cleanliness are provided in the following pages.

Paint

NOT ACCEPTABLE



Flaking paint can harbour insects & previous cargo residues.

Clean with wire-brush and paint.

NOT ACCEPTABLE



Soft and blistering paint due to previous cargoes.

Treat by removing soft paint, thorough cleaning and repainting.

NOT ACCEPTABLE



Paint failure and mild surface corrosion.

Treatment 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.

Treatment requires removal of effected paintwork and repainting.

NOT ACCEPTABLE



Faking paint.

Requires localised treatment and repainting.

NOT ACCEPTABLE



Large areas of paint failure and powdery rust.

Treatment 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 scraped off.
Non-transferable rust, wall not
holed.

No further action required.

ACCEPTABLE



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

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



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

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 acceptable.

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



Flaking paint & transferable rust.

Treat with wire brushing and paint.

NOT ACCEPTABLE



Extensive lower panel corrosion,
undercoat and topcoat failure.

Requires de-rusting, priming and
painting.

ACCEPTABLE



ACCEPTABLE



Non-Transferable rust.

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

ACCEPTABLE



Touching-up any surface rust patches with paint could make a container unacceptable for the carriage of food stuffs, if it emanates an odour.

Moisture and Transferable Stains

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

NOT ACCEPTABLE



Mould must be cleaned and removed from walls.

Transferable stains are to be removed or cleaned unit rendered to non-transferable. The test for transferability is a single gentle swipe (without rubbing) with the bare fingertip.

Non-transferable stains are not classed as a contaminant and can be left as is without further treatment.

NOT ACCEPTABLE – Transferable stains



ACCEPTABLE - Transferable stains removed



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. 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.

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



Transferable oil stains.

Floor must be washed and cleaned thoroughly.

NOT ACCEPTABLE



Transferable oil stains.

ACCEPTABLE



Non-transferable floor stains

ACCEPTABLE



Dry stains on the floor,
Non-transferable.

ACCEPTABLE



Oil spots and tyre marks on the floor,
Non-transferable.

Gouges smooth – no further action required.

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. 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.

NOT ACCEPTABLE



Previous cargo residue. Sweep out or wash and dry.

NOT ACCEPTABLE



Grains and white powder residue. Wash only if residue cannot be swept out.

NOT ACCEPTABLE



Lower recesses contain loose previous cargo residue.

Requires scraping, and washing to remove residues and good interior clean dry.

The interior of a container utilised in the export of food must be clean and dry and free of any contaminants that would physically mix with or affect the condition of the product. Contaminates include inert materials such as plastic beads, flaking paint and rust, oil residues of wet paint.

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.

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.

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 wire¹
- High Pressure water wash²
- Aqueous Ozone wash³
- 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 agent⁴
- Solvent cleaning⁵
- 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. Aqueous ozone washes can be used to sanitise surfaces by removing microbial bodies including bacterial odours.
4. Temperatures of 150 ° may be reached during steam cleaning that could cause the paint to peel, and affect bonding of ply floors.
5. 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.

Infestation

Containers should not contain or harbour any live or dead pests, insects, snails, egg larvae, droppings etc. If a container has been fumigated the person responsible for the unit must obtain a gas-free certificate before an inspection can be conducted.

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, as it might recur when the unit is subsequently resealed, especially if it is stored in an area of high ambient temperature, e.g. 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 are allowed for Food Quality Containers (e.g. Phenol, Paint, Solvent, Chlorine, Chemicals, Epoxy Resin, Disinfectant or mustiness).

Containers must have no residual odour from paint and carry no offensive odours from previous cargo as these can contaminate foodstuffs.

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

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.

Paints and Cleaning Products

For commodities such as grains, which come into contact with the container, it is essential 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 [section 175300](#) of the US Food and Drug Administration Regulations. Paint manufacturers can provide evidence of compliance with this regulation.

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.

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.

Cosmetic Painting of Container Interiors

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, 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.

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.

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. 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 surfaces should be sanded back and undercoat applied followed by topcoat.***

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

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.

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.

APPLICATION 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.

DAFF inspectors will accept linings on the conditions 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.

The use of a liner may be used to overcome superficial problems such as flaky paint, light rust, light transferable stains but not odours or infestible residues such as plant material or soil.

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 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.



Cardboard Liner



Polyethylene Film Liner

30 July 2010

INDUSTRY ADVICE NOTICE NO. G2010/11
Container liners and empty container inspection

This Industry Advice Notice (IAN) provides additional information to previous IAN 1999/8 'Container liners and empty container inspection' in accordance with schedule 5, part 2 of the Export Control (Plants and Plant Products) Orders 2005.

Background

As a result of a shortage of export quality shipping containers in 1999, and at the request of industry, AQIS assessed the use of two types of liners to upgrade containers. At the time, the program released IAN 1999/8, which allowed for the use two types of board liners. This IAN provides information for the use of additional types of liners as outlined below.

Conditions

Conditions for the use of pre-fabricated liners remain and are:

- An AQIS authorised officer must inspect and pass empty container units.
- The use of a liner may be used to overcome superficial problems such as flaky paint, light rust, light transferable stains but **not** odours or infestible residues such as plant material or soil.

Liners can be considered suitable if correctly installed. Shipping containers will need to be inspected by an AQIS approved officer prior to the liner being installed, and monitored by the exporter during loading to ensure the liner effectively negates against non-infestible residues and materials as well as defects such as stains, rust and flaking paint. Liners that are installed and complete prior to loading can be used for both bagged products and suitable bulk grain products, however progressively assembled boards will only be considered suitable for bagged products only.

In the case of woven bladder liners, they may be installed at the time of inspection and the container 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.

Importing country requirements vary and AQIS advises exporters to seek advice from the importing country on any conditions or requirements they have for the use of container liners prior to export.

Grain & Seed Exports Program

Australian Quarantine and Inspection Service

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 DAFF 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

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