

Sea Container Hygiene System An Equivalence System Information Pack

Operational Standards and Facilities Group Border Standards Directorate

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The Ministry of Agriculture and Forestry, approves this Information Pack – Sea Container Hygiene System, An Equivalent System under the Sea Container Import health Standard.

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Date 17/12/09

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Overview

The MAFBNZ Sea Container Import Health Standard (2009) requires that sea containers must be clean and free of pests and biosecurity contamination. The capacity and capability to meet this standard varies between countries and localities and is dependant on infrastructure, biosecurity awareness and willingness to comply.

As a shipping line you may have faced additional on arrival container washing or fumigation costs for containers that should have been dealt with effectively by contracted container processing facilities offshore. The Sea Container Hygiene System (SCHS) is a long term strategy adopted by industry in collaboration with MAFBNZ to manage biosecurity risks associated with sea containers at the port of loading. It is an alternative to existing sea container biosecurity risk management strategies in that it provides a high degree of confidence that container processing contractors, at the port of loading, will be shipping clean containers to NZ. These containers, by and large, will not require any additional cleaning or fumigation in New Zealand. Additionally, as confidence in the cleaning process increases MAFBNZ will reduce on arrival inspections accordingly. Under the SCHS, and with appropriate compliance, it is possible to achieve clearance of 95% of the total consignment without any MAFBNZ intervention.

Cleaning a container and keeping it clean can be challenging, especially in locations where supporting infrastructure and robust container handling processes are lacking. For example, MAFBNZ has repeatedly witnessed container processing facilities doing a reasonable job cleaning containers, but the choice of storage location for clean containers has effectively ruined all the good work conducted. An effective SCHS will ensure the likelihood of recontamination is very low and sustainably manages all related sea container cleaning processes.

1.1 Objectives

The objectives of the Sea Container Hygiene System are as follows:

Reducing biosecurity risk to New Zealand through the introduction of robust contaminant management systems at the port of loading by:

- Implementation of effective container cleaning processes;
- Prevention of re-contamination of cleaned containers; and
- Raising awareness of sea container biosecurity issues at offshore container processing facilities

1.2 System components

The SCHS comprises of five basic industry led processes (see flow diagram 1 attached):

- Scoping exercise to determine baseline gaps in existing cleaning processes;
- Effective cleaning of all sea container surfaces;
- Effective pest population suppression in operational areas of interest;

- Storage of clean containers that minimises re-contamination likelihood; and
- Quality management systems that underpin and document the above processes.

Additionally the SCHS has four basic MAFBNZ led processes:

- Monitoring of container cleanliness through on arrival inspections;
- Providing feedback to industry via voyage reports;
- Enhancing compliance via a compliance framework that rewards by reducing MAFBNZ intervention levels and penalises non-compliance by increased MAFBNZ intervention; and
- Offshore audits are conducted to ensure all industry led processes are functioning as designed and documented in standard operating procedures.

1.3 Cost benefits

Initially, upon the decision to proceed with development and implementation of a SCHS, industry will experience a period of high setup and establishment costs. This can continue, commonly for 6-12mths until the system functions are bedded in by offshore stakeholders. Once awareness of stakeholder roles and responsibilities are established, and enhanced cleaning and storage practices are implemented, the benefits start flowing to industry via reduced MAFBNZ washes, fumigations and inspections. For example, if compliance is maintained continually for 12 months, then on arrival inspections can drop to as low as 5%.

MAFBNZ has analysed industry setup and maintenance costs of existing SCHS including MAFBNZ intervention cost. The analysis concluded that the SCHS offers a superior level of benefits per unit cost. In the SCHS, efforts are focused on actively removing contamination and treating the containers prior to exporting them to NZ and reducing the likelihood of containers becoming re-contaminated with biosecurity contaminants. Container inspections at NZ are thereby reduced to an audit level that is consistent with assuring the system functions effectively with consequential reduction in industry costs for NZ repositioning, inspection and treatment. In the event that offshore prevention fails, the inspection frequencies in NZ can immediately reflect the newly determined risk level. This option is therefore fully flexible and responsive to short term changes to biosecurity risk, rewards effective biosecurity practices with lowered compliance costs, and minimises the risk that pests and pathogens will be introduced into NZ.

The SCHS demonstrates a successful and cost-effective control strategy; it is recommended that similar methods be rolled out elsewhere in the Pacific Islands on a risk-priority basis, and consideration be given to a wider rollout of similar principles where pathway specific biosecurity risk is deemed manageable with this methodology.

The overall benefit to cost ratio for the SCHS varies between the participating ports from a low of 3 to 1 and a high of 8 to 1. Taken across-the-board the system provides a demonstrable and worthwhile net return.

1.4 Operating agreement

To ensure both parties are aligned with expectations, and the respective roles and responsibilities, an operating agreement is included in this document which must be signed by the various parties before any activities commence. (See Section 2)

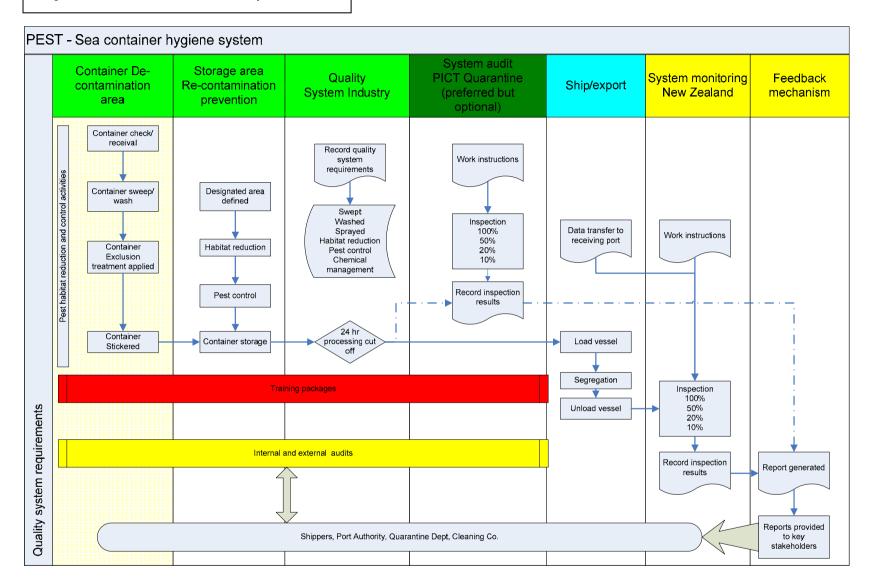
MAFBNZ is willing to discuss any proposed SCHS initiation by industry to ensure any areas requiring clarification are explored. For example, site specific operational or political constraints may need further discussion. Additionally, variations may also be proposed to suit particular operating environments where the same outcomes can be achieved.

1.5 Use of specialist consultants

All current SCHS utilise specialist consultants with relevant technical and operational knowledge to develop site and operations specific pest control strategies on behalf of the industry. Additionally, the consultants are able to provide appropriate training for container processing facility staff, develop Standard Operating Procedures (SOP) and conduct internal audits. MAFBNZ recommends the use of these consultants to reduce lead in time and increase the likelihood of earlier approval of SCHS approval with respect the following factors;

- SCHS scoping and design;
- SOP development;
- Implementation period and trouble shooting; and
- Meeting performance targets.

Diagram 1. Overview of basic SCHS processes.



2. Sample Operating Agreement for a Sea Container Hygiene System

OUTCOME To agree to the roles and responsibilities between MAFBNZ and [

] Shipping Line for joint management of biosecurity risk associated with

imported sea containers

DATED September 2009

BETWEEN Ministry of Agriculture and Forestry, Biosecurity New Zealand (MAFBNZ) and

Shipping Line [].

2.1 Purpose of Agreement

This agreement defines, in broad terms, roles and responsibilities of MAFBNZ and [] Shipping Line regarding the terms of implementation and ongoing operations of a Sea Container Hygiene System (SCHS) that is equivalent to the outcomes specified in the MAFBNZ Import Health Standard for Sea Containers (SEACO).

2.2 Scope:

The scope of this agreement covers a Sea Container Hygiene System that effectively manages biosecurity risk for sea containers imported to New Zealand from specified countries. All exterior and interior surfaces of unloaded (empty) container types, and all exterior surfaces of all loaded (FCL and FAK) container types from the following specified load ports are covered:

Country/ies:

Port name/s:

2.3 Definitions

Consignment A consignment comprises any number of loaded and unloaded

containers (all types) that arrive on the same date and unloaded

off one vessel with a single identifying voyage number.

MAFBNZ Inspector A person appointed as an inspector under section 103 of

the Biosecurity Act 1993.

Non-Compliance Not matching or reaching the MAFBNZ set standard of risk

management as stated in the contamination thresholds table

(Appendix 1, Section 5).

Equivalence The situation of phytosanitary measures which are not identical

but have the same effect (FAO 2002a) as what is stipulated in the

MAFBNZ Import Health Standard for Sea Containers.

Offshore audit Audit carried out by MAFBNZ or Quarantine Service in relevant

country or approved Independent Verification Agency to ensure

Sea Container Hygiene System operational and quality

management system procedures are in place.

On arrival inspection Inspection of Sea Container Hygiene System sea containers

carried out by MAFBNZ Inspectors.

SCHS 'Sea Container Hygiene System'. This includes the

interconnected processes for cleaning, pest management,

storage and quality management systems.

Verification On arrival inspections, audits and monitoring to establish and

document that the Sea Container Hygiene System continues to meet the regulatory, standard or specification requirements.

Voyage report A report generated by MAFBNZ that summarises the on arrival

inspection results, highlights non-compliance issues, and reports

cumulative contamination results.

2.4 Sea Container Hygiene System Setup

The Shipping Line [] will:

- a) Formulate and supply for approval to MAFBNZ, a Standard Operating Procedure (SOP) that covers all processes outlined in b) to f) below;
- b) Develop and implement a pest control programme tailored to manage local pest populations;
- c) Develop and implement a container cleaning process that effectively removes all biosecurity contaminants of concern to MAFBNZ;
- d) Ensure container cleanliness is not compromised by factors such as poor pest management, inappropriate storage conditions, and stowage with non-system containers;
- e) Develop and maintain quality management systems that ensures all processes are effectively administered and tracked:
- f) Conduct regular internal audits to maintain system integrity; and
- g) Develop a formal service agreement with a MAF-approved service provider to formulate, maintain and improve technical aspects of the SCHS.

2.5 Offshore audits

- b) An approval audit will be conducted by MAFBNZ (or relevant Quarantine Agency or approved Independent Verification Agency) to ensure that all operational and quality management system

components of the system are functioning before the initial consignment of SCHS containers are shipped;

- c) Subsequent offshore audits will be conducted against the standard operating procedures (4a above) supplied by [];
- d) Audits will be conducted biannually by MAFBNZ (or relevant Quarantine Agency or approved Independent Verification Agency) until such stage as 12 months of continuous compliance is recorded, at which time audits will be conducted annually; and
- e) MAFBNZ will supply an audit report to system stakeholders within 4 working weeks of the audit completion.

2.6 On-arrival inspection

- a) MAFBNZ will verify SCHS compliance by initially inspecting 100% of all imported containers and examining all exterior and interior surfaces of empty containers, and all exterior surfaces of loaded containers:
- b) On arrival inspection rates will decrease and increase as per section 8; and
- c) MAFBNZ will compile a 'voyage report 'outlining' on arrival inspection results for each separate consignment within 7 working days, and supply this to the SCHS shipping line party/ parties so issues can be resolved before the next consignment arrives (See Appendix 1).

2.7 Non-compliant containers

- a) Containers that are found to be contaminated with biosecurity risk contaminants, during onarrival inspections, will be directed for an approved treatment; and
- b) Non-compliance issues will be documented in the voyage reports and 3 monthly reports and will suggest possible causes for system failures.

2.8 Three monthly reviews

Cumulative contamination rates will be compiled for three month periods and compared to the contamination thresholds set by MAFBNZ. Non-compliant 3 month periods will result in an increase in 'on arrival inspections'. Compliant 3 month periods will result in a reduction in 'on arrival inspections' (Appendix 1).

2.9 Charges

- a) All costs associated with MAFBNZ offshore audits (except staff time) will be borne by [] Shipping Line; and

2.10 Performance measures

Key performance indicators will include:

- a) Outcomes of the offshore audits (i.e. compliance with standard operating procedures):
- b) Percentage of containers that have been processed through the SCHS; and

c) Percentage of SCHS containers that are con	npliant as per contamination thresholds.
2.11 Reporting requirements	
Under the agreement MAFBNZ reporting will in a) Audit reports; b) Voyage reports; and c) 3 monthly cumulative reports (See Appendix	
Shipping line [] reporting req a) Notification of any changes in SCHS as they	uirements will include: relate to the MAFBNZ approved SOP.
2.12 Amendment Clause	
Amendments to this agreement can be made a	s agreed by both parties.
2.13 Termination clause	
Either party to this agreement can terminate the the other party.	e agreement by giving 90 days notice in writing to
2.14. Operating Agreement	
Both parties to this agreement agree to the terr	ms set out above.
Signed:	
MAFBNZ name	(Signature)
Position	Date
Industry name	(Signature)
Position	 Date
Position	 Date

Operating Agreement SCHS – [Country/Port] Authorised by Paul Hallett

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3. Rules, Compliance and Non-Compliances for the Sea Container Hygiene System

3.1 Context

Sea Containers (MT and FCL) exported from approved SCHS ports by the various member shipping lines will receive lower inspection rates by MAFBNZ staff on arrival in NZ after compliance is established in regard to offshore biosecurity management. Designated containers have undergone risk mitigation treatments in designated offshore load ports, and MAFBNZ is assured that regulated pests and general contamination have been managed to minimise biosecurity risk to New Zealand. The risk mitigation measurers in place offshore are part of a documented and MAFBNZ approved 'equivalent system' known as 'Sea Container Hygiene System (SCHS).

The system is regularly audited by MAFBNZ, and a percentage of the total containers inspected on arrival, according to the history of compliance (contamination). The various SCHS performance is closely monitored by MAFBNZ through front line staff recording of inspection results.

3.2 Key MAFBNZ Personnel, Roles and responsibilities

A project team of four MAFBNZ personnel are currently responsible for the administration of the SCHS project;

- Megan Brown Senior Advisor, Sea containers, Project overview;
- Simon O'Connor Senior Advisor, Operational Standards, technical/policy advice;
- Dave Nendick Senior Advisor, Operational Standards, SCHS POM, LAE, HON lead, auditor, reporting; and
- Bridget Roberts National Sea Container Coordinator, SCHS Samoa lead auditor, reporting.

3.3 Key Industry personnel, Roles and responsibilities

Within each shipping line a key central point of contact is made so that MAFBNZ can communicate effectively to the company with audit reports, voyage reports, issues requiring resolution and administration. Each offshore container cleaning/processing yard will nominate a contact usually the supervisor for communication purposes. Each port, where cleaned containers are stored prior to export, will also have a nominated central contact point.

3.4 Container Inspection requirements

All system containers that are selected for inspection and are documented as having been processed through the SCHS system, must undergo a six sided container inspection plus an internal inspection with both container doors opened. Shipping lines will provide to MAFBNZ, an appropriately formatted discharge list (See Appendix 2) 24 hours in advance, but no less than 12 hours in advance, that details all the containers that have been processed under the SCHS. This will facilitate timely container movements and inspections.

Please note: FCL containers are exempt from the port side internal inspection unless containing High risk goods. Internal inspections for low risk goods will be conducted at Transitional facilities.

The only official way that system ports can identify container as having been processed through the hygiene is to place the appropriate stickers on the container doors. If containers arrive from system ports without stickers they will be considered non-system containers and revert to full inspection regimes (See Appendix 3).

3.5 Maximum Pest limits

For the purposes of this project it was necessary to set a contamination threshold or maximum pest limit (MPL) for key pests and general contaminants that are found in or on the sea containers handled through the SCHS. The thresholds set are as follows:

- 5% containers contaminated with 'general' contaminants and/or container labeling issues by port of loading;
- 0.16% contamination with live ants by port of loading; and
- 0.02% with Giant African Snail by port of loading.

General contaminants are classified by MAFBNZ Quarantine Inspectors as either nil, low or high contamination events. Low contamination events are recorded but do not count against the SCHS performance, but do indicate potential problem areas. Low contamination events are dealt to by the inspecting officer or are sufficiently low so as negate the need for any action. High contamination events will generally result in a treatment of some sort (for example, wash or fumigation) and will count towards the statistics recorded against the SCHS performance.

3.6 Review and reporting periods for on arrival container inspection rates

The data collected from the MAFBNZ Quarantine Inspector container inspections on arrival in NZ is submitted via approved templates to MAFBNZ staff for statistical analysis and generation of reports. These reports are emailed to SCHS stakeholders within 7 working days of the vessel arriving in New Zealand (where possible).

The on arrival container inspection results are reviewed on a quarterly basis.

3.7 Quarterly Based Risk management

If thresholds are breached for mobile pests (ants and GAS) for designated 3 month periods, the on arrival inspection rate will increase from its current level to 100% for a 3 month period unless the exception rule applies (see Section 3.8). If thresholds are breached for general contamination for a designated three month periods, the on arrival inspection rate will increase to the next highest increment for example, from 20% to 50%.

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¹ General contamination includes soil, plant products, animal products, wood, packaging and container labelling non-compliances.

3.8 Exception to the Three Month Rule

Where a given port of loading has a history of compliance² but there has been an increase in contamination above the thresholds for a designated three month period, MAFBNZ will increase the on arrival inspection rates, but review the situation after <u>one month</u>. If contamination thresholds have been met within this one month period the on arrival inspection rates will drop to the inspection level below (See flow diagram at end of Section 3).

3.9 On arrival inspection rates

Depending on the history of compliance at a given load port the following on arrival inspection rates will apply based on general contamination rates;

100% of all containers landed



50% of all containers landed



20% of all containers landed



10% of all containers landed



• 5% of all containers landed (Special consideration is required)

3.10 Consignment Based Risk Management

Upon inspection in NZ, where the initial sample from the consignment has breached the set thresholds, a further random sample of containers will be inspected. This is necessary to alleviate concerns by MAFBNZ that the risks associated with the remaining un-inspected containers are being adequately managed.

For example: if 10 boxes from a 100 consignment are inspected (at the 10% inspection rate) and 1 box with ants is found (1% and is therefore immediately above the 0.16% threshold), then MAFBNZ will direct the inspection of a further 10% of the remaining containers from the particular port of origin (a total of 20% of all containers from the port of origin for those unloaded at the NZ discharge port). If the subsequent 10 boxes are free of ants then no further action will take place. If any more ants are found then all (100% for that NZ discharge port) the remaining consignment will

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² defined as two consecutive three month periods where contamination thresholds have been met.

be inspected (See flow diagram at end of Section 3). The importing company will absorb the costs for this. This principle will apply in the same manner to thresholds for GAS and general contaminants.

3.11 Quarantine Inspector Guidance

In order to aid MAFBNZ Quarantine Inspectors in the interpretation of the system components a set of work instructions has been compiled that clearly outline the inspection and reporting requirements. The Work Instructions also give an indication on how to categorise contamination levels through the use of photographic examples and action guidelines. This helps to ensure that MAFBNZ is being consistent in the interpretation of contamination at various New Zealand discharge ports.

3.12 System Auditing

The SCHS system export ports are audited every six months³ to provide MAFBNZ with an assurance that the SCHS system components are still in place and also to demonstrate MAFBNZ's commitment and ongoing support to the SCHS system participants. The audits also serve to improve and add value to the system components, as often recommendations are made to add value to current practices via subtle refinements. The costs for travel, accommodation and associated costs are paid for by shipping lines. MAFBNZ provides the expert auditor's time for the SCHS system monitoring and reporting as a "free of charge" contribution. However, this arrangement may be reviewed in the future.

3.13 Addition of new ports to the SCHS

From time to time, shipping lines in consultation with MAFBNZ may wish expand the number of SCHS export ports that are covered by the SCHS. If additional ports are to be added to the SCHS system, shipping lines and MAFBNZ will need to ensure that the SCHS system components are fully implemented as per a new system. Usually a 'scoping' trip would be conducted to establish what infrastructural, logistical, training and pest management needs must be implemented to fully implement the system at cost to the shipping line.

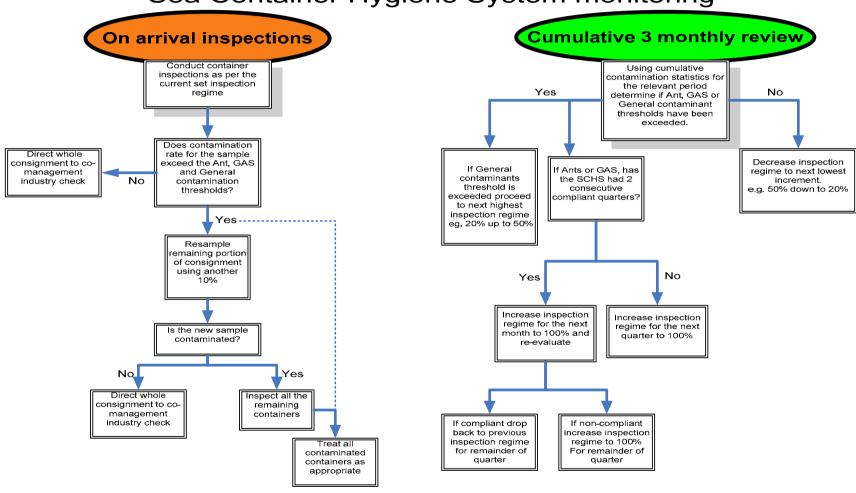
3.14 SCHS Reviews

MAFBNZ will review each SCHS's performance annually, or may be conducted earlier if required. As part of these reviews, key MAFBNZ personnel associated with the SCHS project will meet and discuss SCHS system performance, feedback from stakeholders and any changes in MAFBNZ policy.

Where any changes in requirements are made to the SCHS processes by the project team, communication to all stakeholders will be officially made to ensure everyone is aware of the new requirements.

³ Except where 12 months of continuous compliance has occurred (for example, at 10% inspection regime or less) whereby audits will drop to an annual event.

Sea Container Hygiene System monitoring



4. Detailed Roles and Responsibilities

MAF Biosecurity New Zealand

- To facilitate offshore set-up and implementation by negotiation with key stakeholders (inc. ports, local guarantine, stevedores, Government);
- To provide policy and technical advice to shipping lines, ports and consultant;
- To work collaboratively with consultant, shipping lines, ports and port services to establish the system;
- To actively monitor SCHS progress;
- To report on consignment results as per pre-agreed timeframes;
- To monitor SCHS results and adjust inspection regime as per agreed compliance proforma;
- To suggest causes and remedial action for non compliant containers/consignments;
- To audit on a biannual basis;
- To report on audit findings within 30 days of audit completion;
- To inspect pre-agreed proportion of SCHS consignments;
- To record and report results to MAFBNZ in pre-agreed timeframes;
- To direct appropriate treatment of non-compliant containers; and
- To provide Government to Government facilitation where appropriate.

Consultant

- Scope the port and analyse biosecurity risk in the logistics chain;
- Develop a hygiene system, treat critical areas;
- Establish pest free storage area;
- Training in all the above and include general biosecurity awareness;
- Ensure necessary pest control equipment is available and functional;
- Chemical importation, registration, and continued supply or afore mentioned and stickers;
- Produce a quality manual outlining treatment schedule and associated maps;
- Conduct internal audits on the system requirements;
- Provide ongoing technical support;
- Maintain a watching brief on MAF to ensure adherence to agreed schedule of inspections and policy requirements;
- Promptly recommend appropriate remedial action for non compliant containers/consignments; and
- To work collaboratively with MAFBNZ, shippers, ports and port services to establish the system

Shipping Lines

- To segregate (where possible) SCHS containers on the vessel;
- To reject containers not having being processed through the system and by a 24 hour 'cut off time';
- To communicate 'cut off time' to clients with timeline for compliance;
- To facilitate system implementation and maintenance by ongoing communication with ports and port service companies to ensure system standards are complied with;
- To work collaboratively with MAFBNZ, consultant, ports and port services to establish the system; and
- To provide shipping manifest in the appropriate format in the agreed timeframes, detailing all the SCHS containers.

Offshore port companies (as appropriate)

- To report containers not processed as agreed to MAF BNZ prior to arrival in NZ;
- To ensure any port based 'NZ designated storage area' is kept pest, weed and trash free as per 'system requirements' in conjunction with port service companies;
- To report to MAFBNZ any deviation from system requirements as soon as they occur and notifying MAFBNZ of any non complying containers;
- To provide the necessary infrastructural requirements for cleaning companies to meet 'system' needs e.g. hard stand or equivalent, lighting (if required), container stands, high pressure washing facilities etc. This maybe done in conjunction with shipping lines and/or MAFBNZ; and
- To work collaboratively with MAFBNZ, shipping lines, consultant and port services to establish the system.

Offshore container processing facilities (port or off-port)

- To provide containers to system specifications for the shippers associated with the SCHS;
- To apply all 'system requirements' as per SOP and quality systems; and
- To work collaboratively with MAF BNZ, shippers, and ports to establish the system.

Appendix 1. Sample Voyage Report and Cumulative 3 Monthly Report

[SHIPPING LINE] /MAF BIOSECURITY NEW ZEALAND SEA CONTAINER HYGIENE SYSTEM OPERATING AT [COUNTRY] VOYAGE REPORT – SEA CONTAINER CONTAMINATION RATES [VOYAGE NUMBER]

Report Date: 23/11/2009

NZ Ports of Unloading: Tauranga, Auckland

0 0 :							
PORT OF	CONTAMINANT or PEST	NUMBER	TOTAL	PERCENT			
LOADING		CONTAMINATED	NUMBER	CONTAMINATION			
LOADING		CONTAINERS	CONTAINERS	PER VOYAGE			
Apia	General	0	50	0 %			
Apia	Ant	0	50	0%			
Apia	Giant African Snail	0	50	0 %			

Comments: [COUNTRY] (Inspection on arrival in NZ for this period – 50%):

There were 50 containers imported from Apia on this voyage. The consignment consisted of 44 empties and 6 FCL's. All containers in this consignment had been managed under the Sea Container Hygiene System in Apia. A total of 20 was inspected in New Zealand and were all found to be fully compliant.

General Comments – [VOYAGE NUMBER]

Another great result for [Shipping Line]; the inspection results on this voyage show no reportable levels of general contamination and zero ant and Giant African Snail activity.

3 Month Cumulative Assessment Report: 1 September 09 – 30 November 09:

SCHS Port	Compliance	General Contamination (Threshold 5 %)	Ant Infestation (Threshold 0.16 %)	Giant African Snail Infestation (Threshold 0.02%)
[COUNTRY]	yes	0.68%	0.0	0.0

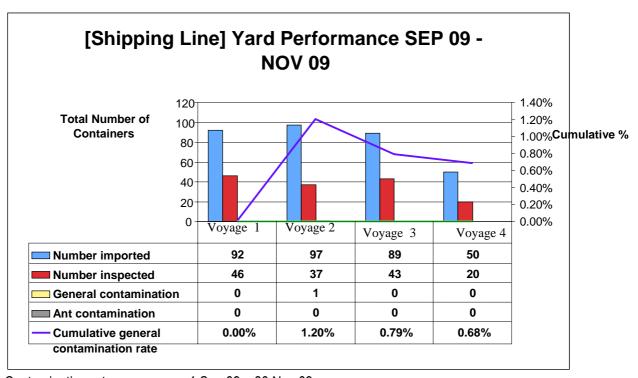
This report concludes this 3 month period (1 September to the 30th November). Over the last 3 months, 374 containers were imported from [COUNTRY], of those 328 were managed under the Sea Container Hygiene system (please note that the general contamination % has been amended to reflect the non system containers)

In the last three months a 50% inspection rate was applied on all system containers arriving from Apia. A total of 146 containers were inspected, with only one non complying container. The ant contamination levels have dropped to 0% however be prepared that the next three months is

traditionally the ant season, so ensure all components of the system are carefully monitored. Also be vigilant for any snails arriving in the yard on the underside of containers.

Staff at the [NAME] depot should be very proud of themselves for establishing and maintaining a system which is consistently exporting exceptionally clean containers, resulting in effective management of the biosecurity risk.

The cumulative results show that [Shipping Line] is well under the established performance thresholds. As such, the next 3 Month period will be conducted at 20% inspection rates. Well done team, keep up the good work.



Contamination rates per voyage 1 Sep 09 – 30 Nov 09

Appendix 2. Discharge List on Approved SCHS Template

[VOYAGE NUMBER] SCHS 6 sided inspections

					Contamination			ľ		
						Inte	ernal	Exte	ernal	
LOP	Container	LP	ISO		Comments	Low	High	Low	High	Sticker
	Container	LP	ISO		OK					у
ABC	BXNU3601237	PWA	2500	MT	OK					у
ABC	BXNU3602402	PWA	2500	MT	OK					у
ABC	FCIU2696650	PWA	2210	MT	OK					у
ABC	FCIU3194804	PWA	2210	MT	OK					у
ABC	FSCU3242394	PWA	2210	GENL	OK					у
ABC	FSCU3595447	PWA	2210	MT	OK					у
ABC	FSCU3802797	PWA	2210	GENL	OK					у
ABC	FSCU5201434	PWA	2232	MT	OK					у
ABC	FSCU5204080	PWA	2232	MT	OK					у
ABC	FSCU5210740	PWA	2232	MT	OK					у
ABC	FSCU5215850	PWA	2232	MT	OK					у
ABC	FSCU5216028	PWA	2232	MT	OK					у
ABC	PALU4800119	PWA	2500	MT	OK					у
ABC	PALU4800171	PWA	2500	MT	OK					у
ABC	PPSU4200234	PWA	2210	MT	OK	_				у
ABC	PPSU4500036	PWA	2500	MT	OK					у

Appendix 3. Approved SCHS Label (Example)

[CLEANING YARD COMPANY NAME]	[PORT]	[COUNTRY]
		DATE
SWEPT	$\sqrt{}$	12/4/09
INTERNAL WASH		13/4/09
EXTERNAL WASH	√	13/4/09
SPRAY	V	13/4/09
CHECKED BY		Joe Bloggs

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