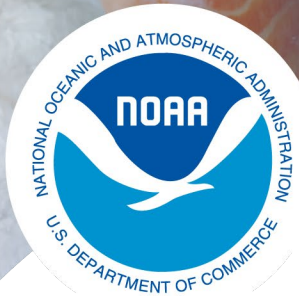




Shipping Container and Import Inspections



**NOAA
FISHERIES**

**Office of Law
Enforcement**

SEAFDEC PSM Container Inspection Workshop

Bangkok, Thailand

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OLE

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Source: USCG Container Inspection Training and Assistance Team, Student Workbook Ver. 4.6
& Special Agent (Ret.) Al Samuels, NOAA OLE

Performance Objective

Given a shipping container with seafood product, the officer/inspector will be able to identify safety considerations, verify the accuracy of carton markings and shipping documents and use this information to aid in the determination of the legality of product.



Topics

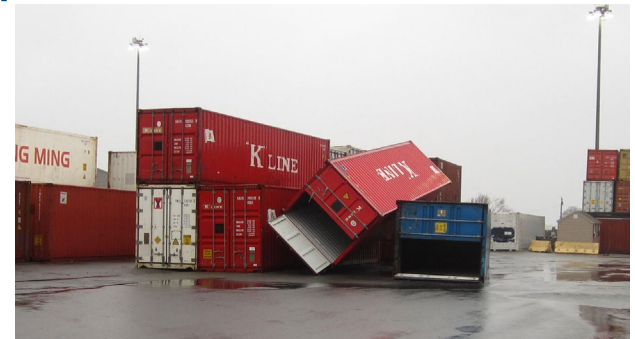
- #1: Identify safety considerations during container inspections
- #2: Document container and carton markings
- #3: Examine seafood in cartons
- #4: Analyze carton markings and shipping documents

Safety Considerations

- Inspection of dry freight containers present the potential for significant hazards and health risks. The most prevalent risk is that posed by:
 - vehicles/heavy equipment.
 - falling from a container
 - being hit by falling/shift cargo
 - the atmospheres in the containers must be safely managed

Terminal Hazards

- Designated waterfront facilities are very busy places where time is money. Some of the hazards you will see at a facility include:
 - Fast moving trucks
 - Container handling equipment with restricted driver visibility
 - Containers mounted on a chassis (fall hazard)
 - Containers being moved overhead
 - Falling twist locks and other container locking equipment
 - Containers collapsing or falling



US CBP

Container Hazards

- Recognize the other hazards shipments can exhibit. Hazards associated with general cargo include:
- Improperly dunnaged or packaged cargo; such as:
 - Fallen crates, boxes, or pallets
 - Scattered dunnage
 - Spilled/leaking cargo
 - Sharp nails/metal
- Cargo falling out of container
- Oxygen deficient, flammable, or toxic atmospheres
- Falling from tank containers
- Inspector fall hazard over 6 feet



TIS, GDV

General Safety Precautions

- The following is a general list of safety precautions for inspecting containers:
 - Inspect containers on shore
 - Review shipping papers, to confirm cargo in a container
 - Review hazard information provided by the shipper.
- Establish a safe zone to conduct the inspection. Use vehicles and/or traffic cones to keep trucks and other heavy equipment away from the container being inspected.



General Safety Precautions

- Prior to opening the doors, attach a container strap to prevent the container door from uncontrollably opening and allowing cargo to fall out when the locking bars are rotated.
 - If used properly by securing around the locking bars, it will prevent the doors from violently opening and keep shifted cargo from falling out onto you/team members. At minimum, it will give you time to get out of the danger zone.
 - Never stand in front of the door, always step to the side, behind the door as it opens so you are clear of any falling cargo or toxic fumes



Forankra AB

General Safety Precautions

- Assume all containers contain an unsafe atmosphere (low/no oxygen, explosive or toxic)
 - after opening the container quickly move away (upwind) from it and let it ventilate naturally for 15-30 minutes.
- Treat any leaking cargo that may be hazardous as a release—terminate the inspection, egress up wind, and notify appropriate parties.
- Exercise caution when examining cargo.

Oxygen Deficiency

- The following situations could be an indication that the container could be oxygen deficient:
 - Contains any organic matter, which may decay (Seafood!)
 - Shows rust (reaction of metal and oxygen causing the air to become anoxic)
 - Has been freshly painted
 - Contains fruits or vegetables
- Personal indications that the container could be oxygen deficient after opening are:
 - Dizziness,
 - Light-headedness,
 - Happy/Goofy feelings, and/or
 - Blackouts

Safety Equipment

- The most important tool to use while conducting container inspections is your own head. Remain alert and pay attention to your surroundings. The easiest tool to use is personal protective equipment (PPE) such as:
 - Hard hats
 - Safety Glasses
 - Coveralls
 - Reflective vests
 - Gloves
 - Safety Boots
 - O2 sensors
 - Multi-gas detectors
 - Safety straps



USCG

Inspection Equipment

- Other equipment recommended to conduct inspections include:
 - Inspection Tape to re-seal cartons
 - Digital camera or smartphone to take photos
 - Knife or box cutter to open cartons
 - Gloves (preferably cut resistant)
 - Tape Measure for measuring sizes, reference for photos
 - Clipboard to hold inspection sheet and shipping documents
 - Forensic Field Test Kit (if applicable)

Inspection Equipment examples



Safety ALERT

- ALWAYS keep exposed skin covered with long sleeves and gloves
 - This is a case of a USCBP Officer picking up a “foreign” infection (proper gloves could have prevented this):
 - The bug is called *Mycobacteria marinum*. It is usually an ailment from someone who works in the aquarium or fishing industry, but the bacteria is present in any aquatic environment, both marine and fresh water.
 - He received this from examining 3 containers of frozen froglegs that had been previously used to transport frozen seafood.



US CBP

Import and Seafood Container Inspections

The purpose and goal of each inspection is to:

- Document the cartons and product within
- Collect and verify the shipping documents – Bill of Lading, Invoice, Customs Entry
- Compare the shipping documents to the markings on the cartons
- Review and analyze the documentation to determine where the product originated

In completing these steps you will validate each piece of data by comparing to other data and observations during the inspections. If data cannot be verified or does not match, further investigation is needed to determine the legality of the seafood product as best you can.



Inspection Procedure

- Phase 1 Preparation
 - Gather and brief team on duties
 - Safety Brief – Identify Hazards and Assess Risk
 - Personal Protective and Inspection Equipment
 - Identify contents of container (Shipping Documents)
 - Always obtain the entry packets from the brokers and/or via Customs, preferably prior to examination of the container
- Phase 2 Safety Assessment
 - Visual Assessment of Exterior of Container
 - Document Container with photos
- Phase 3 Container Opening
 - Attach safety strap
 - Remove security seal (Document with Photos)
 - Assess tailgate for shifted cargo
 - Ventilate container



Inspection Procedure

- Phase 4 Conduct Tailgate Inspection
 - Limit the number of persons conducting the tailgate inspection to the minimum necessary.
 - Never enter a container without someone else being aware of where you are and what you are doing



Inspection Procedure

- Exercise caution when trying to examine cargo forward of the doors.
- Carry a flashlight into the container and nothing else
- Don't take anything into the container that you don't mind leaving there, e.g. wallet, telephone, etc.



Inspection Checklist

Inspection Process

CHECKLIST A TAILGATE CONTAINER INSPECTION PROCEDURES

This job aid is intended to provide summary information for this enclosure and should be used as a checklist during shore side container inspection operations.

PHASE 1: PREPARATION.

- ☐ 1. Establish communications between inspection team, the COTP, and the facility.
- ☐ 2. Assemble PPE and needed inspection equipment.
- ☐ 3. Select containers for inspection.
- ☐ 4. Conduct safety brief in accordance with CGTTP 3-72.3.
- ☐ 5. Identify the contents of selected containers and obtain shipping papers.
- ☐ 6. Stage containers for selection in accordance with CGTTP 3-72.3.
- ☐ 7. Establish safety watch review safety procedures.

PHASE 2 SAFETY ASSESSMENT.

- ☐ 8. Examine the exterior of the container, looking for indications of potential internal hazards such as cargo leakage, damage to the container, etc. *Do not open a container that has been fumigated within the previous 24 hours. Review the container's fumigant marking to ensure 24 hours have elapsed since being fumigated.*
- ☐ 9. Place a multi gas meter at the foot of container door sill to test vapors that might escape from container.

PHASE 3: CONTAINER OPENING PROCEDURES.

- ☐ 10. Attach container strap to container doors. Ensure strap passes behind all four locking bars.
- ☐ 11. Remove the container seal and record seal number on applicable form.
- ☐ 12. Assess tailgate for shifted cargo. Open the right side door enough to check for shifted cargo, spilled material, or other hazards. If hazards are determined, notify the facility manager/container custodian immediately. **LEAVE THE AREA IMMEDIATELY, AND DO NOT ATTEMPT TO CLOSE THE DOOR. POST A SAFETY WATCH A SAFE DISTANCE AWAY** from the container
- ☐ 13. Ventilate the container for 15 minutes, unless the container has been fumigated or contains a Poison by inhalation hazard in which ventilate 30 minutes (15 minutes per door).
- ☐ 14. Test the atmosphere at the tailgate using the multi gas meter.

PHASE 4: CONDUCT THE TAILGATE INSPECTION.

- ☐ 15. Conduct tailgate inspection. A minimal number of people should enter the tailgate area (Marks, Labels, Segregation, Packaging, and Blocking & Bracing, etcetera). Reseal the container once tailgate is finished and complete applicable forms. Deliver copy to container custodian and keep a copy for MISLE entry.

Inspection Lessons Learned

- If the container load is structured to allow for access to the nose, climb on top of stacked contents (without damaging them) to examine contents at the furthest point forward as possible.



Inspection Lessons Learned

- If contents are in boxes, obtain at least one box from furthest point away from the rear container doors and the deepest point possible within the stack.
 - Remove that box (and/or other boxes) from the container for further examination.
 - Select random boxes throughout the container (especially if there are several commodities)



Inspection Lessons Learned

- If the contents of the container are perishable, minimize the time that the load and/or selected contents are exposed to external temperatures.
- If the container will be tunneled, ensure that an empty, already chilled reefer container is located adjacent to the original container and immediately have the contents transferred into the empty container by port/union personnel
 - pre-coordination is necessary for this to occur.

Photos

- For refrigerated container, temperature gauge on reefer unit
- Rear container doors PRIOR TO opening, including container number
- Security Seal
- Status of contents upon opening



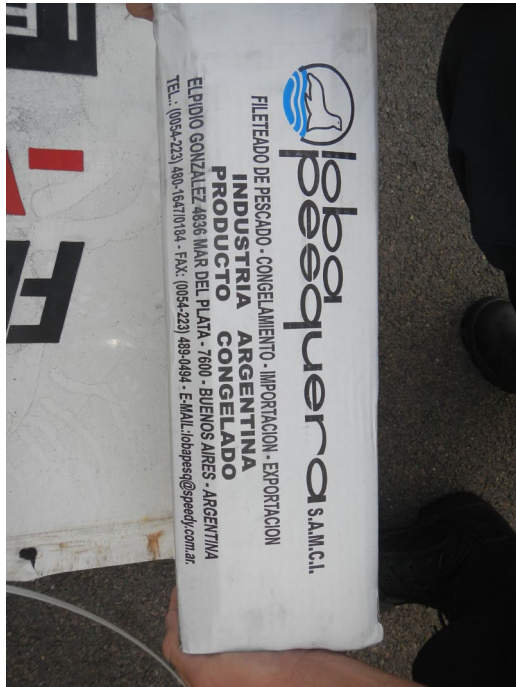
Photos



Photos

- Exterior of all boxes removed for further examination (ALL sides of the box should be photographed
 - any writing on the box should be in focus and large enough to read in photographs) – top, bottom, side, side, side, side
- If the box is removed from the container is a master carton, open the box and take photographs of all sides of at least one of the boxes inside the master carton
 - top, bottom, side, side, side, side

Photos



Photos



Photos

- Photographs of the contents of interior boxes, e.g. fish fillets, should be taken with a tape measure in the photographic frame.



Photos

- Repack the contents of the master carton and seal it with appropriate tape, indicating that it was examined.
 - Place the master carton(s) back into the container as expeditiously as possible.
- Take a photograph of the contents of the container and close the doors of the container
 - Customs and/or union/port personnel will place a seal onto the container.



Photos

- Further container exams in the same 'operation' should be continued in the same manner
- Photographs are now 'bracketed' between
 - shots of the container number,
 - container doors
 - all photographs from that container's contents,
 - container doors again.

Analysis

- Compare to the labels on the boxes in the container
 - Line item/commercial invoice description
 - Customs Entry description
 - Stickers?
 - Country of origin?
 - Species Description

Case Study

Unlabeled, Undeclared seafood



NOAA FISHERIES

- Random inspection of refrigerated (reefer container)
- Multiple agencies involved (Customs and Border Protection, Food and Drug Administration, State Fish and Wildlife and NOAA OLE)
- Multiple commodities (mostly Seafood Import Monitoring Program species) within container
- Container imported from Venezuela



- [illegible]





- Samples taken and sent to NOAA lab



- Contents of container were separated out onto pallets by species
- Undeclared/unmarked boxes set aside on own pallet

- Multiple species of shark and ray were found
- One prohibited species, silky shark, was found

Review

Safety is the primary concern when conducting import and shipping container inspections

- Follow checklist to mitigate safety hazards

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