# Approved arrangements for container inspection and cleaning: Have Your Say survey results

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**Acknowledgement of Country**

We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their care for and cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of Australia’s agriculture, fisheries and forestry industries.

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## Summary

The [Hitchhiker Pest Program](https://www.agriculture.gov.au/biosecurity-trade/pests-diseases-weeds/hitchhiker-pests) was established to address the increasing risk of hitchhiker pests and contamination that can be carried via sea freight containers. One of the key elements of this program is partnering with industry through the establishment of new approved arrangements (AAs) to inspect more sea containers arriving into Australia.

To better understand the potential impact and likely uptake of the proposed AAs, a Have Your Say survey was conducted during August to October 2024, targeting businesses and individuals involved in the shipping container logistics pathway. The survey returned responses from businesses operating in most major and some smaller ports. Some key themes in the responses were:

* Level of interest – The majority of respondents already hold AAs and are interested obtaining approval to conduct container inspection and cleaning activities to manage hitchhiker pest risks by either extending the scope of existing AAs or establishing new AAs.
* Benefits – The perceived benefits of obtaining approval to conduct container inspection and cleaning activities to manage hitchhiker pest risks include the ability to offer additional commercial services and facilitating a prompt clearance of containers without the need to book a biosecurity officer to conduct the inspection.
* Minimum container volumes – The minimum number of inspections required for perceived viability of entering the arrangement ranged from 2 to 50 per week, with reasonable consistency in anticipated minimum volumes for respondents in the same operating zone.
* Maximum container volumes – The maximum inspection capacities varied significantly across all respondents, indicating an ability for importers identify a suitable service provider to match their business needs including import volumes and other consolidated services that may influence their choice.
* Encouragement – Ways the department could encourage the adoption of container inspection and cleaning activities to manage hitchhiker pest risks under an AA included providing projected container volumes by location, making the process to add these classes to an existing AA or application for new AAs quick and easy, providing support to applicants to facilitate applications, including the assessment and approval.
* Discouragement – Factors that may discourage the adoption of container inspection and cleaning activities to manage hitchhiker pest risks under an AA included the costs associated with initial set up and ongoing management of the AA and the impact of regulatory and operational requirements associated with container inspection and cleaning activities to manage hitchhiker pest risks may have on core business operations.
* Choice of inspection by department or industry – The majority of respondents identified the overall efficiency of the process, minimising impact to clearance timeframes and costs as the key determining factors when choosing whether to use an industry provider or the department to conduct container inspection and cleaning activities to manage hitchhiker pest risks.
* Effect on container discharge location and choice of commercial operator – Most respondents believed introducing the AA would have a minor effect on the choice of discharge port or commercial operator, however potentially faster and/or cheaper clearance locations might be favoured.

Additionally, responses detailed the following concerns, comments and suggestions for consideration:

* The impact that additional container inspection and cleaning activities to manage hitchhiker pest risks may have on supply chain congestion.
* Containers should be inspected and cleaned at or as close as possible to the discharge port to ensure effective management of biosecurity risks.
* To ensure effective implementation industry participants approved to conduct container inspection and cleaning activities to manage hitchhiker pest risks must be properly trained and have their competency verified.
* A potential conflict of interest for industry participants approved to conduct container inspection and cleaning activities to manage hitchhiker pest risks related to charging for services, including unregulated industry charging for these services.
* If there would be sufficient volume of containers requiring inspection to make applying to conduct container inspection and cleaning activities to manage hitchhiker pest risks viable for industry participants and ensure sufficient service provider options at ports.

### Next steps

Although the survey returned a limited number of responses, the feedback received indicates positive interest in the potential benefits of industry container inspection arrangements. The next steps will include:

* continued collaboration with both departmental and external stakeholders to further refine the policy
* the development of industry facing software for managing container inspections and entering inspection results.

## Introduction

The survey consisted of:

* background information about the proposed intervention policy and draft AA class conditions.
* a preliminary set of questions designed to gather information on the respondent and their business, and option for respondents to either:
  + provide a written response, or
  + answer targeted questions about the proposed container inspection arrangement to gauge level of interest and assess potential impacts to the container logistics pathway ([Appendix A](#_Appendix_A:_Survey)).

The survey was advertised using a variety of public communication channels including:

* publication of an industry notice on the department web site
* promotion on the department’s surveys web page
* Facebook
* LinkedIn.

Additionally, the survey was directly disseminated to known stakeholders via:

* direct emails to approximately 1,000 relevant individuals/businesses, primarily consisting of existing approved arrangement holders
* 12 industry representative organisations and industry newsletters.

The survey responses included:

* 25 submissions in total (2 received via email after closing date)
* 24 completed surveys and 1 written submission.

This report consists of:

* data and tables summarising the feedback
* a summary of comments represented as dot points
* the number shown in parentheses after each comment represents the number of respondents that mentioned that concept/theme e.g. ‘more efficient process (10)’ means 10 people mentioned this theme.

## Results and themes

### Respondent business type

The preliminary survey questions were designed to gather information about individual respondents and their businesses to identify the range of stakeholders that responded and the issues or themes that were identified by different groups. All respondents were asked:

* Which of the following best describes your business? Respondents were able to select from the following options and could identify as more than one business types: sea freight depot, empty container park, shipping line, shipping agent, customs broker, freight forwarder, road transporter, transport depot, port authority, importer, other (please specify).
* Does your business currently operate under a biosecurity approved arrangement with the department?

Table 1 shows how respondents described the type of business they operated.

Table 1 Survey respondent business type

| Business type | Respondents that identified as this business type |
| --- | --- |
| Sea freight depot | 7 |
| Road transporter | 6 |
| Transport depot | 6 |
| Customs broker | 5 |
| Freight forwarder | 5 |
| Empty container park | 3 |
| Port authority | 2 |
| Fumigator | 2 |
| Stevedore | 1 |
| Shipping agent | 1 |
| Shipping line | 0 |

Collectively the respondents represented 30 existing AAs, noting that some respondents hold more than 1 AA. Table 2 details the range of classes held under these AAs and the number of times a class was included in an AA held by a respondent. While there is a wide variety of classes held by respondents, many currently are approved to conduct similar biosecurity activities including container inspections (classes 2.6, 11.2 and 14.4), container cleaning (class 4.3) or other treatments (classes 4.1, 4.6, 4.7, 12.1 and 12.3).

Table 2 Approved arrangements held by respondents

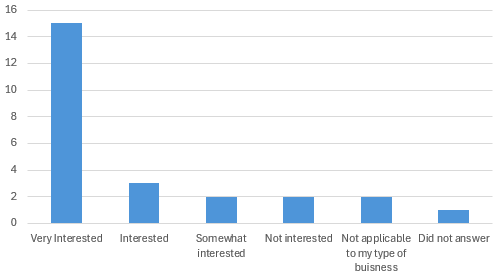
| AA class | Respondent AA sites holding the AA class |
| --- | --- |
| 1.1: Sea and air freight depot (unrestricted) | 7 |
| 1.3: Sea and air freight depot (restricted) | 11 |
| 2.2: Agricultural products | 1 |
| 2.3: Bulk Stockfeed/fertiliser | 1 |
| 2.4: Fresh produce, nursery stock and cut flowers | 2 |
| 2.5: Temperature controlled storage | 1 |
| 2.6: Empty shipping container parks | 3 |
| 2.8: Temporary storage of containerised refrigerated pig meat | 1 |
| 4.1: Heat treatment site | 7 |
| 4.3: Cleaning | 13 |
| 4.6: Fumigation | 18 |
| 4.7: Secure unpack for treatment of seasonal hitchhiker biosecurity pests | 10 |
| 10.2: Biosecurity waste collection | 1 |
| 10.5: Biosecurity waste storage | 1 |
| 10.6: Biosecurity waste transport | 1 |
| 11.2: External container treatment | 2 |
| 12.1: Methyl bromide fumigation | 6 |
| 12.3: Heat treatment | 4 |
| 14.4: Rural tailgate inspection | 11 |
| 19.1: Non-commodity for containerised cargo clearance (Broker AA) | 3 |
| 19.2: Automatic entry processing for commodities (Broker AA) | 2 |

### Level of interest in the proposed approved arrangements

Question 1 of the survey asked respondents to indicate their level of interest in obtaining approval to conduct container inspection and cleaning activities to manage hitchhiker pest risks under an AA. Most respondents indicated an interest to obtain approval to conduct container inspection and cleaning activities to manage hitchhiker pest risks under an AA. 60% of respondents were interested or very interested, and 20% somewhat interested. Respondents that represented businesses that operate in multiple cities or ports indicated that they would likely seek to conduct container inspection and cleaning activities at all locations.

Respondents that did not indicate an interest in obtaining approval to conduct container inspection and cleaning activities to manage hitchhiker pest risks under an AA progressed to question 7 of the survey.

Figure 1 Level of interest



Questions 2 and 3 of the survey asked respondents who indicated an interest in obtaining approval to conduct container inspection and cleaning activities to manage hitchhiker pest risks under an AA to identify the city (question 2) and the location(s) within the city (question 3) that they currently operate from. The responses identified that there was potentially interest in obtaining approval to conduct container inspection and cleaning activities to manage hitchhiker pest risks under an AA and at a wide variety of locations.

Figure 2 shows their business location per city and location within the city. Some respondents represented businesses with sites operating in multiple ports. This information is useful when considering future container inspection capacity by industry per port and per container pathway risk category.

Figure 2 Interested party business locations within each city

Figure 2 shows a bar graph that indicates where interested respondents are located and whether they are based at the wharf, port, metro or non-metro.
Adelaide: 1 at wharf, 2 at port and 4 based in the metro.
Brisbane: 2 at wharf, 3 at port, 2 metro and 1 non-metro.
Darwin: 1 metro based respondent. 
Fremantle: 2 wharf, 2 port, 3 metro.
Melbourne: 2 wharf, 1 port, 8 Metro.
Sydney: 2 wharf, 3 port, 4 metro.
Townsville: Only 2 respondents based in the metro. 
Other locations: 4 port and 1 metro. 


### Anticipated benefits for obtaining approval

Question 4 of the survey asked interested parties to identify the benefits they anticipate for their business if they obtained approval to conduct container inspection and cleaning activities to manage hitchhiker pest risks under an AA. Respondents anticipated benefits to include:

* An ability to offer additional services to clients allowing for all biosecurity intervention to be conducted at the same location (12)
* An ability to offer a faster clearance process e.g. no need to book an inspector (9)
* Reduced costs for clients due to minimising transport and container detention charges and ability to use existing extended operating hours (4)
* Increase biosecurity intervention including faster detection and actioning of pests (3)
* Minimal changes to site facilities to accommodate the new activity due to already having required infrastructure (1)
* Increased options for importers, more flexibility while ensuring biosecurity risks are managed (1)
* No response provided (5)

### Minimum container volumes

Questions 5 of the survey asked respondents to indicate the weekly volume of container inspections needed for the AA to be viable for their business. Responses returned reasonably consistent anticipated minimum numbers of weekly inspections for respondents currently operating in the same zone (on wharf, port precinct or metro areas), however some respondents operating in port precincts anticipated significantly higher weekly minimum inspections would be required to make conduct container inspection and cleaning activities to manage hitchhiker pest risks under an AA financially viable.

Table 3 displays estimated minimum container volumes based on the location of the respondents.

Table 3 Estimated minimum container inspections per week

| Zone | Minimum viable range | Average number of containers required | Median number of containers required |
| --- | --- | --- | --- |
| On wharf locations | 20-40 | 22 | 25 |
| Port precinct locations | 6-50 | 28 | 29 |
| General metro area locations | 10-30 | 22 | 20 |

**Maximum container volumes**

Questions 6 of the survey asked respondents to indicate the weekly maximum volume of container inspections their site could accommodate. Responses returned reasonably consistent anticipated maximum weekly capacity for respondents operating in on wharf locations. Respondents operating either port precincts or metro areas provided a much larger range of anticipated weekly capacity with some respondents anticipating limited ability to conduct container inspection and cleaning activities to manage hitchhiker pest risks under an AA considering current services they provide. In contrast other respondents indicated capacity to play a key role by conducting 100 to 250 container inspections per week. The varying responses in these zones indicate a range of service provider options should be available to importers.

Table 4 displays estimated maximum container volumes based on the location of the respondents.

Table 4 Estimated maximum container inspections per week

| Zone | Anticipated maximum weekly capacity range | Average anticipated maximum weekly capacity | Median anticipated maximum weekly capacity |
| --- | --- | --- | --- |
| On wharf locations | 100 | 100 | 100 |
| Port precinct locations | 20-200 | 71 | 110 |
| General metro area locations | 30-250 | 111 | 140 |

### Further information and encouragement from the department

Questions 7 and 9 of the survey asked respondents to identify what additional information would assist businesses to determine whether to obtain approval to conduct container inspection and cleaning activities to manage hitchhiker pest risks under an AA (question 7) and what the department could do to encourage uptake of the arrangement (question 9). Comments relating to additional information included:

* Clarification regarding the cost associated with applying and maintaining an AA would help determine if obtaining and maintaining an AA for to conduct container inspection and cleaning activities to manage hitchhiker pest risks is commercially viable (3).
* Further information about the class conditions to conduct container inspection and cleaning activities to manage hitchhiker pest risks to allow an understanding of how these will impact current operations (2)
* Projected container inspection volumes per location per annum (1)
* No response provided (23).

Suggestions on how the department could encourage uptake included:

* Making the application and approval process quick and easy, including department support and resources for the initial phase of the AA set up and to facilitate approvals (5)
* Guaranteed container volumes, container referrals spread evenly across sites (2)
* Financial assistance e.g. reduced annual fees, assistance for wash bay set up costs (2)
* Supplying a list of trained industry professionals to assist with setting up an AA (1)
* Expand the scope of the existing class 14.4 rural tailgate inspection AA to manage these container inspections as well (1)
* User-friendly guidelines for wash bay set up (1)
* Policy of industry only inspections (1)
* Clear process flows and timely responsiveness from department officers when they are required to become involved e.g. manage pest detections (1)
* Adopt a trusted trader program (similar to the Australian Border Force approach) with additional benefits for participants (1)
* No response provided (12)

### Discouraging factors

Question 8 of the survey asked respondents to identify issues that may discourage businesses (either their own or others) from obtaining approval to conduct container inspection and cleaning activities to manage hitchhiker pest risks under an AA. Comments included:

* Perceived or actual additional regulatory burden, poor understanding of regulatory requirements and/or additional business responsibilities (2)
* The cost of application and auditing fees in comparison to additional revenue from conducting the activities (1)
* The impact that conducting container inspection and cleaning activities to manage hitchhiker pest risks under an AA has on normal operations (1)
* No response provided (22).

### Industry versus department inspections

Question 10 of the survey asked respondents to consider what factors might be important in choosing between an inspection conducted by industry under an AA or to have the inspection conducted by the department.

General considerations included:

* Decision based on efficiency e.g. speed, cost, flexibility, availability, minimising container movements, minimising container detention fees, ability to get information regarding inspection results, ability to discuss risk management options effectively and/or obtain risk management advice (7)
* Importers are often guided by brokers in deciding where containers are inspected, with brokers typically opting for their preferred locations (2)
* Current and planned workloads and the notice period required to make bookings (1)

Reasons to elect for industry inspection under an AA included:

* Industry inspection may be preferred if faster clearance times are achieved due to department inspection booking timeframes and greater span of hours for industry operators (3)
* The ability of the industry operator to carry out the required activities (3)
* The ability of industry to streamline the inspection process and use electronic solutions to improve efficiency (1)

Reasons to elect for inspection by the department included:

* Trust and accountability and expertise of departmental inspectors (1)
* Consistency and fairness in fees charged by the department. Fees are not dependent on individual service agreements, or the volume of inspections completed for an entity (1)

### Container discharge location

Question 11 of the survey asked respondents to consider the effect that AAs for container inspection and cleaning activities to manage hitchhiker pest risks would have on the discharge port for containers.

Figure 3 Level of impact on discharge location

Question 12 of the survey asked respondents to identify factors that might influence the effect that AAs for container inspection and cleaning activities to manage hitchhiker pest risks would have on the discharge port for containers. Factors included:

* Discharge ports that provided faster clearances may be preferred (4)
* Issues including increased inspection volumes or limited-service options that may result in congestion or uncertainty may impact choices (2)
* Cost effectiveness and speed of clearance may favour larger port compared to smaller/regional ports (2)
* No or unrelated response (15).

### Choice of commercial operators

Question 13 of the survey asked respondents to consider the effect that AAs for container inspection and cleaning activities to manage hitchhiker pest risks would have on the choice of commercial operators (e.g. stevedores, empty container parks, sea freight depots) in the onshore logistics chain.

Figure 4 Level of impact on choice of commercial operator

Question 14 of the survey asked respondents to identify factors that might influence choice of commercial operator. Responses included:

* Fast clearance timeframes and reduced costs (3)
* Price competition as sites may negotiate better pricing for customers (2)
* Performing the inspection on the wharf means that the options importers have for choosing onshore logistics chain will remain as they are now (1)
* Freight forwarders and brokers may choose to use smaller operators who provide a better level of service compared to major stevedores and logistics providers (1)
* Limitations to container pick up slots favour large operators compared to small operators (1)
* Brokers nominate their preferred depots (1)
* Empty containers will be pre-booked into empty container parks prior to discharge (1)
* No response provided (14).

### General comments, suggestions or questions

Question 15 of the survey asked for any other concerns, comments, suggestions or questions about the AAs for container inspection and cleaning. Responses included the following:

* Additional container inspections may result in supply chain congestion, delays and therefore increased costs; some terminals and depots are already very busy (4)
* Containers should be inspected and cleaned at the port; moving containers increases biosecurity risk (3)
* Industry must be properly trained and verified in container inspection (3)
* Department officer availability is a major concern so will be alleviated by industry-performed inspections, like class 14.4 rural tailgate AA inspections and export authorised officer (AO) inspections (1)
* The department is seen as objective, but industry may suffer conflict of interest. For example, some industry sites may "ensure" containers pass inspections without any issues being detected to generate more business. Alternatively, industry sites may "find" biosecurity risk material to allow additional charging for cleaning (1)
* Unregulated industry charging such as excessive container detention/storage fees when inspection and cleaning is required. Charges should only be for inspection and cleaning if required (1)
* The department should ensure industry utilisation of the new AAs is sufficient to make it worthwhile applying. The utilisation of class 14.4 rural tailgate inspections by brokers/forwarders has been less than ideal (1)
* Additional resourcing requirements to manage extra work required to manage container inspection process (1)
* Will the new proposed container inspection classes replace the existing class 14.4, such that all containers are inspected under the one class? Additional and more stringent conditions would make me reassess if there is a viable cost benefit in applying (1)
* Only lower risk pathway containers should be inspected by industry (1)
* Build government owned automated wash bays in the wharf or port so containers can be cleared promptly (1)
* Create rail corridors for container movements (1)
* Give a compliance-based benefit for biosecurity risk free supply chains (1)
* A mobile treatment provider could perform container inspection/cleaning at various sites (1)
* Industry inspections should occur at locations with 24-hour camera access for accountability (1)
* In ports with no land available, the AA will only be taken up by existing operators, meaning new operators will not be able to sign up (1)
* No response provided (8).

## Next steps

The feedback received through this survey is being considered in the continued development of the policy for container intervention, inspection and treatments. Given the low survey response rate, the department will directly engage with key stakeholders through face to face and virtual meetings to discuss the proposed arrangements and their level interest/concern.

Key elements associated with this work are:

* developing an updated policy position on container intervention
* finalising class conditions and training
* developing software for industry to use for managing container inspections and entering inspection results.

### Appendix A: Have your say questions

#### About you (preliminary questions)

1. First Name [mandatory field]
2. Last Name [mandatory field]
3. Email [mandatory field]
4. Business name [mandatory field]
5. Position in business [mandatory field]
6. Which of the following best describes your business? [mandatory field]
   1. Response options: Stevedore, sea freight depot, empty container park, shipping line, shipping agent, customs broker, freight forwarder, road transporter, transport depot, port authority, importer, other specified
7. Does your business currently operate under a biosecurity approved arrangement with the department? [mandatory field]
   1. Response options: Yes or no
   2. Yes: what is your approved arrangement reference number?

#### Submission upload

1. You may wish to upload a written submission on the proposed approved arrangements for container inspection/cleaning instead of, or in addition to completing this survey [upload submission]
2. Would you like to continue the survey?
   1. Response options: Yes or no
   2. Yes: Continues to survey questions
   3. No: Skips to submit

#### Survey questions

1. How interested is your business in entering into a container inspection and cleaning arrangement?
   1. Response options: Very interested, interested, somewhat interested, not interested, not applicable to my type of business.
2. What Australian city/town are your business operations physically located in? If you are responding on behalf of a business that operates in multiple locations and wish to respond on behalf of all locations, select each location.
   1. Response options: Adelaide, Bell Bay, Brisbane, Darwin, Fremantle, Gladstone, Melbourne, Newcastle, Sydney, Townsville, Other
3. Which of the following best describes the operational location of your business in <insert city/town name as indicated above>?
   1. Response options: On wharf, Port precinct, Metro area, Non-metro area, Other
4. What benefits to your business would you expect from having an approved arrangement for container inspection/cleaning?
5. What weekly volume of container inspections would make a container inspection/cleaning arrangement viable for your business?
6. What weekly volume of container inspections would be the maximum your business could accommodate?
7. What additional information would your business need to have to decide on whether or not to enter into a container inspection/cleaning arrangement?
8. What would discourage businesses (yours or others) from entering into an approved arrangement for container inspection/cleaning?
9. What do you think we could do to encourage businesses (yours or others) to enter into an approved arrangement for container inspection/cleaning?
10. If industry can choose inspection of containers by either industry or by the department, what factors do you think would be important in making this choice?
11. How much do you think the introduction of approved arrangements for container inspection/cleaning would affect where containers are discharged?
    1. Response options: Major effect, Minor effect, Minimal or no effect, Unsure
12. Please provide details on the ways that discharge of containers would be affected.
13. How much do you think the introduction of approved arrangements for container inspection/cleaning would affect choice of commercial operators (e.g. stevedores, empty container parks, sea freight depots) in the onshore logistics chain?
    1. Response options: Major effect, Minor effect, Minimal or no effect, Unsure
14. Please provide detail on how the choice of commercial operators in the onshore logistics chain would be affected.
15. What concerns, comments, suggestions or questions do you have about the approved arrangements for container inspection/cleaning?