



CONSISTENCY

— and —

COLLABORATION

in Organic Certification

# Inspection and Supervision of Bulk Vessels

Presented by Garth Kahl –  
Independent Organic Services



The organic industry's increasing use of bulk vessels poses unique challenges for the preservation of organic integrity and traceability for both certifiers and certified entities. These problems are not insurmountable, but may require that additional measures be taken by certifiers and certified entities.





Exporter



Port Facility. Covered by exporter's OSP or independently certified



Bulk vessel transport (must be under importer's OSP)



Certified organic importer

Certified organic importer takes custody at ship's rail. Their OSP MUST include descriptions and documentation showing how they supervise this step.

This is an organic critical control point! Importer's OSP must demonstrate how they address and control it.





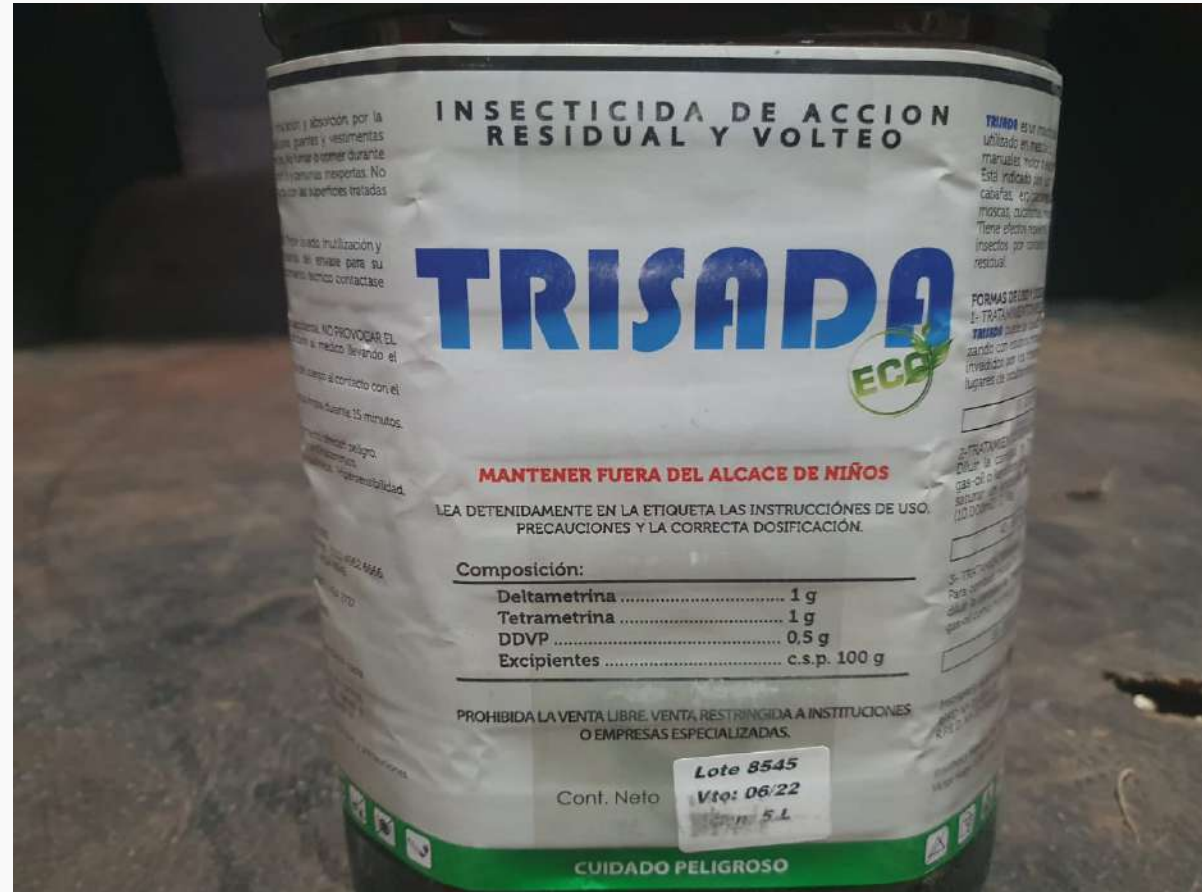
# Challenges with bulk vessels

- Multiple cargoes, some food grade, some toxic, virtually none OG.
- Captains and crew completely unfamiliar with OG requirements.
- Chartered by importer weeks or months ahead of time, but may arrive at port any time within a 10-14 window (or more) depending on delays at previous ports.





# Challenges with bulk vessels



Local phytosanitary regulations may require fumigation of holds if insects are found. Certified importer must have active monitoring on the ground to record material applied, documented wash/rinse.

# Mitigation Measures/Best Practices

Holds pressure washed with potable water and mopped prior to loading OG cargo or after fumigation. Activities must be well documented by importing entity's representative on site.

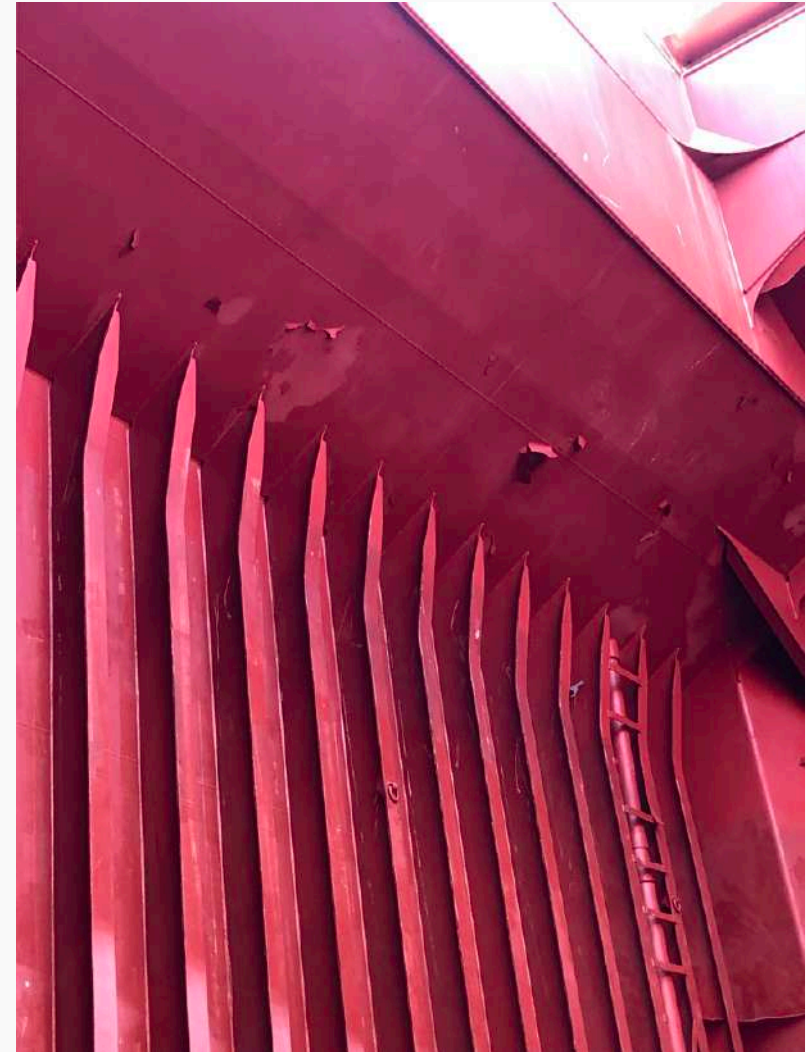




# Challenges with bulk vessels



Holds must be inspected and verified free of foreign materials, odors, etc.



Holds must be free of peeling paint.



# Mitigation Measures/Best Practices



Removing flaking paint with air wand



Sweeping and collecting fallen paint



# Mitigation Measures/Best Practices



Bilges confirmed dry and covers sealed. This is usually documented in marine surveyor's report. Should be available in importer's records.



# Required documentation



Hose test to confirm hatch covers don't leak. Usually supervised by the marine surveyor. Importer should have this record available for review at inspection.

M.V. FEDERAL CHURCHILL  
At Rosario (Argentina) - 22<sup>ND</sup> OCT 2020

I confirm the following method of cleaning holds for loading Organic Sugar at Rosario.

Method of Cleaning Cargo Holds:

- 1) Thorough Sweeping.
- 2) Salt Water Washing.
- 3) Fresh Water Wash Using High Pressure Wash Machine.
- 4) Drying of Tank top.
- 5) Thorough cleaning of Bilges.



Capt. Rizwan Andullah Mammoo

Master

Federal Churchill

# Documentation – Minimum

Signed statement by ship's  
Master showing cleaning.  
Should be available at  
inspection.

Lista Chequeo Para Carga de Azúcar Orgánico en buques  
*Checklist for the Loading of Organic Sugar on Ships*

#	Punto de control/ <i>Control Point</i>	Comentarios/ <i>Comments</i>	Yes / <i>Sí</i>	No	Fecha/ <i>Date</i>
1	<i>Are hatch covers of the hold clean and free of foreign materials?</i> ¿Están las tapas de la bodega limpias y libres de material extraño?	Las tapas de las bodegas se encontraban limpias y libres de material extraño	X		23/10/2020
2	<i>Was a hose test performed to ensure that hatch covers adequately prevented entry of rain or seawater?</i> ¿Se realizó una prueba de manguera para garantizar que las tapas no permitieran la entrada de lluvia o agua del mar?	La prueba de manguera se realizó con presión de 300 bar. Fue desarrollado pro el Surveior Red Flint. Se adjunta material fotográfico y filmaciones. Además de pruebas de Ultra Sonido	X		23/10/2020
2.5	<i>If leaks were detected during the hose test, were these adequately sealed with Ram-Nek tape?</i> Si se detectaron fugas durante la prueba de manguera, ¿se sellaron adecuadamente con cinta Ram-Nek?	No se detectaron filtraciones	X		23/10/2020
3	<i>Is the hold free of foreign material, bad smells or evidence of contamination?</i> ¿Está la bodega libre de material extraño, mal olores o evidencia de contaminación?	La bodega estaba libre de materiales extraños, sin olores ni evidencia de contaminación. Como fueron detectados gorgojos y plagas de trigo (grano anteriormente cargado), se fumigo (detalle de productos y dosis enviado (TRISADA). Las bodegas se lavaron con lampazo y jabón y se enjuagaron con manguera de alta presión. (se envío Evidencia)	X		23/10/2020
4	<i>Is there written/visual confirmation that the holds</i>	Se revisaron las bodegas 1-3 y 5. La inspeccion fisica en con el barco anclado en la rada mostro	X		23/10/2020

Rev. 9.2.20

# Documentation – Best Practice

Importer's representative on site completes more detailed checklist (5-7 pages), covering multiple contamination risks. This document becomes part of importer's permanent record and can be reviewed at annual inspection.



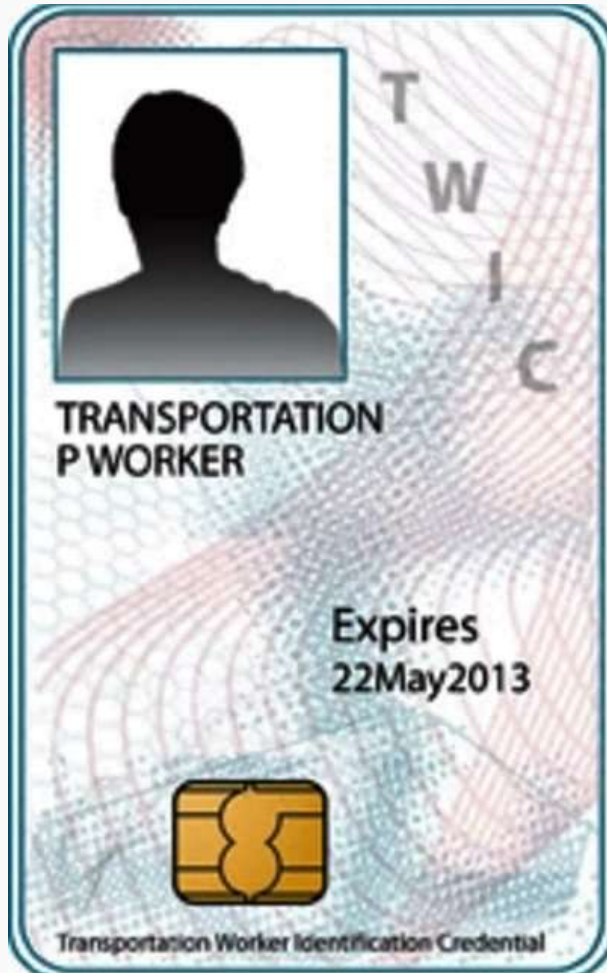
# Best practices for importers using bulk vessels

- Charter party (contract between importer and shipping agency) should include specific measures the Master and crew will take to protect organic integrity. These should be reviewed at inspection.
- Importer's OSP should clearly specify measures taken to protect organic integrity of product during loading and transport on bulk ships, addressing risks noted above.
- A representative from the importer, with knowledge of organic requirements, should attend loading and unloading activities.

# Best practices for importers using bulk vessels

- Importer's shipping documents should clearly specify port facilities, vessels used and include copies of completed checklists used to document vessel cleaning. "Know your customer and supply chain."
- If requested, importers should be prepared to share detailed vessel itineraries with their ACA in order to facilitate inspections of the loading process.

# Inspection challenges with respect to ports and bulk ships



A Transportation Worker Identity Card (TWIC) is required for all individuals entering US ports, similar to entering a restricted area at the airport.



You should not expect to be provided with bump hat, headlamp, steel toed shoes, safety vest. Best to bring your own!



# Inspection challenges with respect to ports and bulk ships

AT&T Wi-Fi 23:13 100%

< Back IOLCOS GENESIS

Cargo  
Received: Now

Vessel's Track Add Alert Add to Fleet

DESTINATION

[CA] VANCOUVER  
2021-01-27 10:38 LT

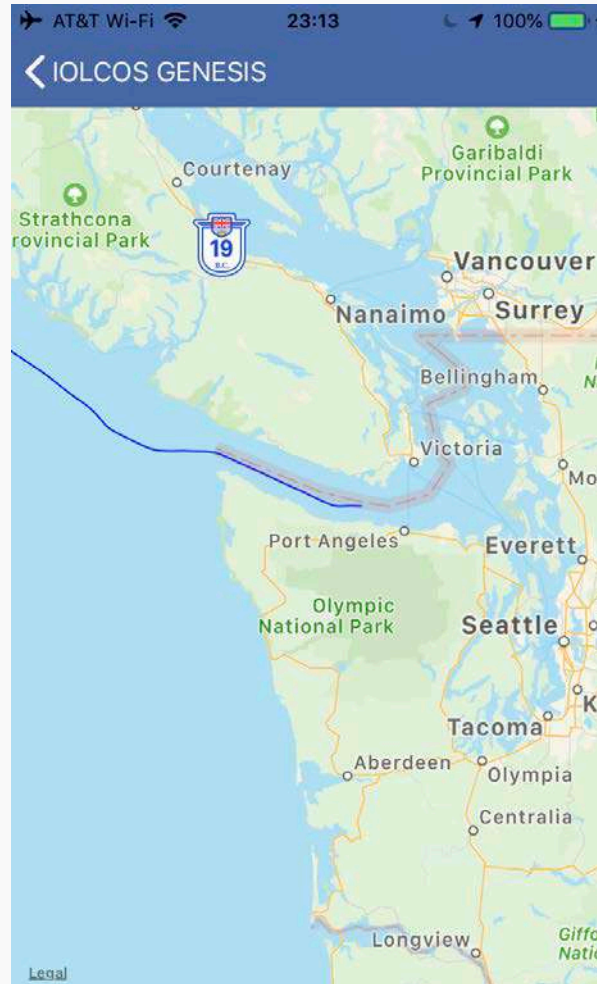
POSITION INFO

LATITUDE	LONGITUDE
48.22579°	-123.70638°
SPEED	COURSE
9.5 kn	92.4°
DRAUGHT	CURRENT AREA
14 m	The Coastal Waters...

NAVIGATION STATUS

Under way using engine

BASIC INFO



Download a ship tracking app on your phone to estimate when the vessel you need to inspect will be arriving in port. Importer can/should also furnish you with updates from the shipping company, but often the ship tracker is **MORE ACCURATE**

# At the port – who are the players?

- **Captain (Master)** of the vessel — responsible for everything that takes place onboard. Captain can stop loading and reject the load if s/he thinks it could possibly be contaminated. Almost all captains speak English, no matter where the ship is flagged.
- **(First) Mate** — the captain's 2nd in command. May be the person you interact with.
  - Interview Captain or Mate for information on previous cargoes, washing of holds with fresh water, pesticide applications. If importer properly briefed shipper on organic nature of the cargo, and specified organic control measures in the "charter party," these questions should not come as a surprise to the Master/Mate.

# At the port – who are the players?

- **Marine Surveyors** — these are the representatives of the importer. They survey the ship to ensure that it is clean (to conventional standards, NOT OG), check accuracy of the scale at the port to prevent fraud, perform hose tests to check hatch covers for leaks and inspect holds to ensure these are sound. They also collect before/after draft data from the ship and monitor the loading from start to finish.
  - Both exporter and importer may hire different marine surveyors to check the status of their respective sides of the operation, though exporters' surveyors don't board the ship and importer's surveyors generally don't inspect ports beyond the scale facilities.
- Marine surveyors are an incredible resource and natural ally. They are there to prevent fraud and contamination. Take every opportunity to learn from them and educate them about organic requirements. Once educated, they can augment your efforts to help ensure organic integrity.



# At the port – who are the players?

- **Port managers** — responsible for storage and loading of product at the port. Ideally their actions are overseen by the certified exporter or the port is certified themselves. As an inspector of the certified importer, you may have little need to interact with them, other than to explain your role and gain access to the port/ship.
- **Exporter's reps** — if the port facility is not certified, they should be present to supervise the loading. If not, there is a major breach of organic integrity (see NOP 4009) on the part of the exporter.
- **Longshore crews** — responsible for bringing cargo from warehouses to the dock alongside the ship, running the ship's cranes to load the product into the holds. Generally have no knowledge of the organic nature of the product, unless the port facility is certified.



Port managers



Importer's representative



Exporter's representative



Master/Mate



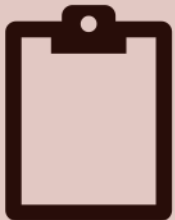
Inspector(s) for exporter's certifier?



Surveyor for importer



Inspector for importer's certifier?

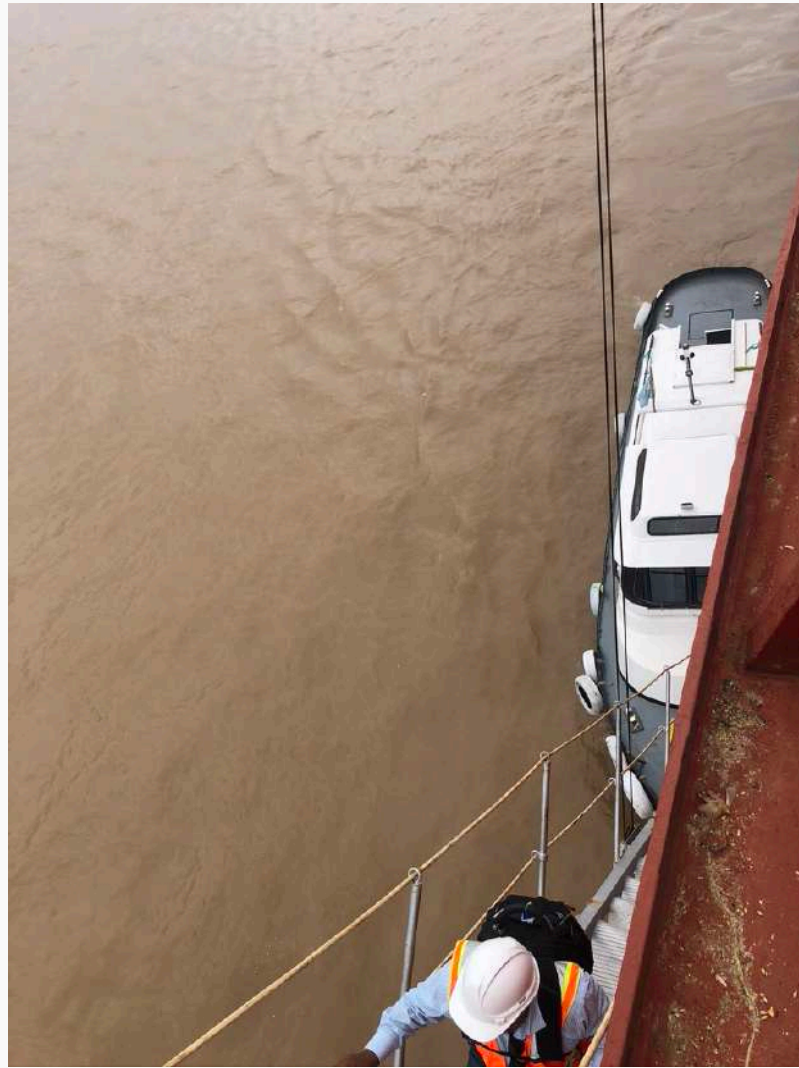


Surveyor for exporter



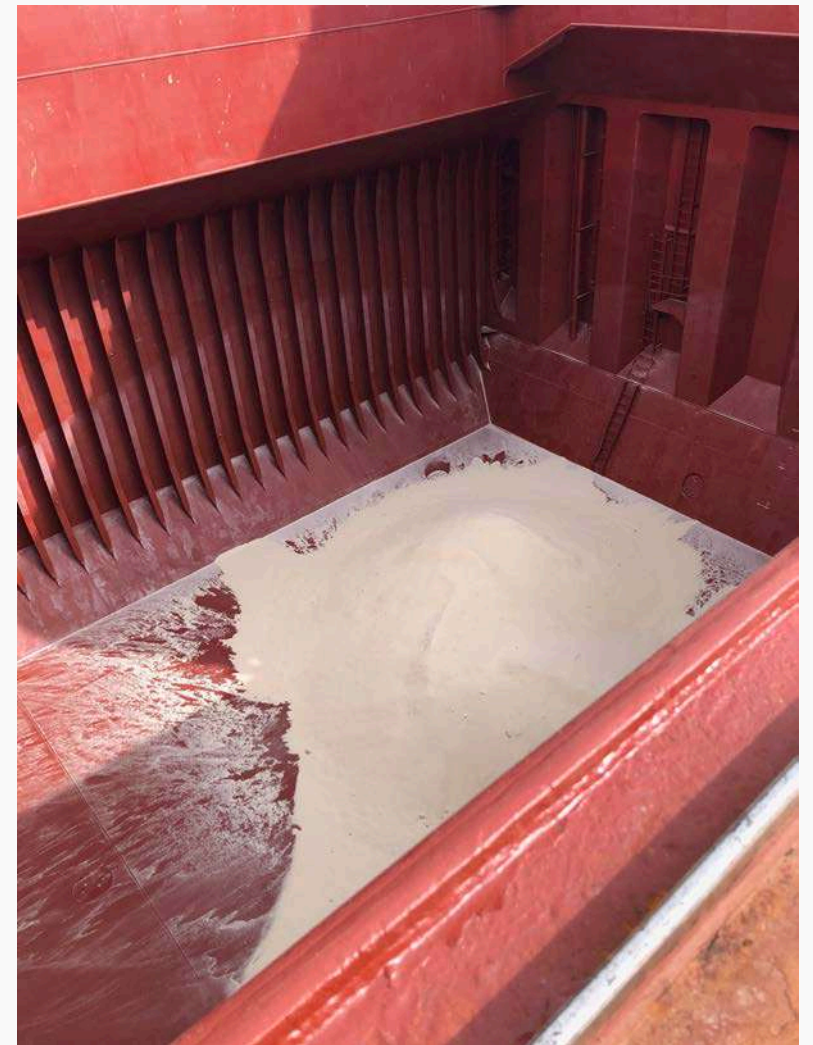
Longshore workers





If vessel has not yet docked, you may need to take a small boat out to supervise holds inspection and hose test while the ship is moored offshore. Stick close to the marine surveyors and observe.





Ship's gear in action. Presumably exporter's personnel (and even local certifier) have supervised cleaning of clamshells and dock. Remember importer takes custody at ship's rail.





Once filled, hatch covers are closed and should receive a numbered seal, recorded by the marine surveyors.



Vessel: Federal Churchill

Job No. RMSORD70758

Marine surveyor's reports should be reviewed at or after loading, either by on-site inspector or during importer's annual inspection. This contains a wealth of information including:

- Confirmation that hose test was completed
- Confirmation of scale testing
- Draft survey results
- Remarks about contamination issues encountered during loading/unloading

**Delivery:**

**Inspection:**  
 Holds inspection was carried out on October 22, holds 1, 3 & 5 were rejected due to live insects. Same were cleaned/fumigated by a 3rd party and during subsequent inspection October 23 all holds were accepted. Hose test was witnessed October 22 and holds 1, 3 & 5 were found without evidence of water ingress. Hatch covers were sealed prior to transit to Buffalo.

**Method of Loading:**

Bulk sugar is delivered to the pier by trucks. Two (2) shore cranes with grabs load sugar on board.

**Method of weighing:**

Two (2) truck weighbridges are used jointly as the official scale. Trucks weigh tare, are loaded, then weigh gross to determine net sugar. Pier tallies are compared to scale tallies to ensure all trucks that weighed were loaded.

**Draft Survey Results**

	MT	Diff to B/L	% Diff to B/L
B/L	15,250.000		
Shore figure*	15,258.300	8.300	0.054%
Draft Survey	15,174.740	-75.264	-0.494%

\*Include spillage compensation 8.300 MT

**Scale Testing:**

The scales are tested via comparison weighing against one another. The truck scales were last calibrated July 2019 which is outside the one year maximum in sugar contracts. This year's calibration was postponed due to COVID19 (see attached notice) and is not scheduled to occur until 31-Oct-20. Notwithstanding the scale being more than 1 year from last calibration, scale tests during operations were within the acceptable tolerance of +/-0.10%. See below results.

**Sampling / Analysis:**

Samples are drawn from each truck at the time of discharge alongside. Samples are mixed and packed each 1,000 MT loaded per shipper. Duplicate samples were sent to Markan Labs NY for polarization, color and moisture analysis, held in R. Markey's local retention, and provided to Shippers.

**Photo Links:**

<https://photos.app.goo.gl/MRcr9hV57EBGR7A17>

**Observations:**

R. Markey requested 13.6 MT of compensation sugar for estimated spillages during operations. This is in addition to whatever was realized at the culmination of operations, which we estimate to be about another 5 MT. Shippers loaded 8.3MT additional above the BL, which we do not think is adequate to ensure the BL was met. Draft survey, though inherently unreliable and irrelevant contractually, also suggests the BL was not met. Master issued an LOP during loading for presence of small, easily breakable lumps and bees. We advised him that these occurrences are normal for bulk sugar cargoes, though they proceeded with LOP nonetheless.

**Stoppages:**

Below

**Scale test:**

Shift No	Date	Test No.	Truck	Ticket	Time	Scale 1			Scale 2			Scale 2 Difference			Scale 2 %Difference											
						Gross	Tare	Net	Gross	Tare	Net	Gross	Tare	Net	Gross	Tare	Net									
1	10/27/2020	1	ES705	81943	0:48	41,300	16,200	25,100	41,340	16,220	25,120	-40	-20	-20	-0.10%	-0.12%	-0.08%									
3	10/27/2020	2	LVV547	82092	14:03	45,980	15,920	30,060	46,020	15,940	30,080	-40	-20	-20	-0.09%	-0.13%	-0.07%									
6	10/28/2020	3	AYM824	82247	7:58	47,420	15,620	31,800	47,420	15,640	31,780	0	-20	-20	0.00%	-0.13%	0.06%									
8	10/28/2020	4	TET634	127209	19:02	46,280	15,240	31,040	46,300	15,240	31,060	-20	0	0	-0.04%	0.00%	-0.06%									
9	10/29/2020	5	VMB297	82403	3:34	42,320	15,200	27,120	42,320	15,200	27,120	0	0	0	0.00%	0.00%	0.00%									
11	29/10/2020	6	WXG571	127588	15:54	42,800	14,820	27,980	42,800	14,840	27,960	0	-20	-20	0.00%	-0.13%	0.07%									
												Average						-0.04%			-0.09%			-0.01%		



# Take home lessons for organic enforcement:

- ACAs certifying import operations utilizing bulk shipping may be missing many threats to organic integrity and need to ask the right questions of certified importers.
- ACAs may not be requiring importing operations to sufficiently document how they are supervising and maintaining organic integrity during loading of bulk vessels.
- Certifiers should strongly consider requiring importing operations using bulk shipping to pay for inspection at the foreign port one or more times a year during vessel loading.
  - Certifiers should adjust fee schedules and OSPs with these entities so that the scheduling and cost of these inspections is included.

# Take home lessons for organic enforcement:

- This is the perfect opportunity to coordinate with other ACAs in the country of origin and/or contract independent inspectors in the region to supervise both loading and port activities.
- Coordination between ACAs should be considered a Best Practice for exports/imports utilizing bulk vessels.



Exporter



Port Facility. Covered by exporter's OSP or independently certified



Bulk vessel transport (must be under importer's OSP)



Certified organic importer

Area for collaboration between certifiers to ensure maximum organic integrity.





“If the mountain won't come to Muhammad, then Muhammad must go to the mountain.” – Purported Turkish proverb, as told by Francis Bacon.

# Special thanks:



For allowing the use of images and examples from their import operations and for their on-going commitment to ensuring organic integrity.



Pedro Landa and all the staff at OIA for images, comradery and being a great local partner in the efforts to ensure the organic integrity of the operations highlighted.





"A great would be that in 5 years people don't recoil when they hear the words 'organic bulk shipment'." – Don Hill, Sucro Can Sourcing





Independent Organic Services, Inc.

Phone: +1 (541) 486-4400, Cel (541) 602-2156

Email: [independentorganic@gmail.com](mailto:independentorganic@gmail.com)

Skype: garthkahl

<http://www.independentorganicservices.com>