

# **Response to Industry Issues relating to the Neutron Scanner Project**

**14 July 2005**

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## Background

Following commissioning and licensing of the facility there will be a six month ramp-up period. The ramp-up period will be used to gradually build up the number of Unit Load Devices (ULDs) processed each day.

Customs will commence testing the technology and business processes with purpose loaded unit load devices (ULDs) and less time critical cargo, moving to scanning a selected flight or flights during the day. This will be followed by an increase in cargo throughput and hours of operation at the facility. Associated business processes will be refined in response to identified problems during the ramp-up period.

Input and feedback from industry, through tours and familiarisation sessions along with continuing forums, will be an integral part of the refinement process.

## Communications

1. *How will industry be notified that ULDs (and consignments) are diverted to or held at the facility?*

### *Ramp-up period*

Customs will continue to place a hold on targeted cargo. An option for ULDs that are to be diverted to the neutron scanner facility is to place a hold on targeted flights in advance of their scheduled arrival. Customs is working through the detail of the options with both policy and IT areas within Customs.

Communication between Customs and operators for other issues, for example when individual consignments are held following unpack, will be finalised prior to the commencement of the trial.

2. *How will this affect the accuracy of real-time status reporting over the internet on industry sites?*
4. *What ACA / ICS status will the cargo have while it is diverted for scanning?*

A hold at the flight level will not prevent reporting actions being undertaken but will override other holds at the lower or consignment level until the higher level hold is lifted. The status will be capable of being checked by industry via their individual ICS diagnostic functions. Once the higher level hold has been lifted any change to the status of the consignment will be able to be viewed via the ICS.

3. *Can a help desk be established at the facility, specifically for the field trial to determine the location of cargo for example, rather than going via the central help desk in Sydney?*

It has been agreed that a help desk, with a dedicated phone number, will be established for the first six months of the field trial. Continuation of the dedicated line will be assessed near the end of the six month period. Contact details will be provided once telephones are installed and operational.

5. *In what timeframe will the advice on diverted ULDs be provided?*  
 57. *How will status and location of ULDs be provided to relevant parties? Need accurate and timely information of where the cargo is and when it is / will be available.*

Variables such as the time of report, receipt of the Impending Arrival Report and Screening period will determine the timeframe for status advice. In addition to status from the ICS, specific system developments are being investigated to provide email advice. Customs intends to test this arrangement and other options in the early stages of the ramp-up.

6. *Is there a web site with additional information?*

Industry updates and additional project information will continue to be provided to industry through the Industry Consultative Group (ICG). It is intended that this information will be placed on the Customs Internet site.

## Contingencies

7. *What is the contingency if the facility is “overloaded” or subject to system failure.*  
 8. *Will there be a cut off timeframe to activate contingencies.*  
 9. *Contingencies should be planned with CTO’s input*

Customs will implement procedures to ensure that affected parties are advised of any overload or system failure at the facility that would prevent continued scanning operations. The subsequent contingency arrangements will be developed in consultation with CTOs and ramp handlers and will specify relevant timeframes. A working party comprising representatives from AaE, Patrick, Qantas and relevant peak bodies is being established to determine ramp handling solutions. The solutions will include consideration of time critical cargo and contracted service level agreements.

## Cost Recovery

**10.** *What are the plans for cost recovery after the trial?*

**15.** *If cost recovery is to be introduced, what is the estimated quantum?*

There will be no cost recovery during the trial. Government will determine any further use or increased deployment of the technology and the application of cost recovery to the activities. The decision will be based on the evaluation of the Brisbane trial that will include assessment of the technology and associated business processes.

**11.** *Will cost recovery be applied to exports?*

**13.** *There will be an impact on overseas market share of exports where competitor's quality is improving and cost is lower.*

It is standing Government policy for there to be no cost recovery applied to exports. While this policy remains in place Customs export processes and activities will not be cost recovered.

**12.** *With cost recovery those importing will be required to pay twice as airlines pay for x-ray of exports from some overseas countries.*

Customs is involved with current international discussions about supply chain security that incorporates x-raying of exports overseas. The outcomes of these discussions are not finalised.

**14.** *Will cost recovery of the scanner be offset by savings from existing intervention methods?*

The cost of Customs intervention activities at 77G premises is currently recovered through the import processing charge. The trial will assess the effectiveness of the technology and related processes. The evaluation of the scanner will include consideration of the extent of and necessity to continue with existing Customs examinations at 77G premises including cost recovery issues if these activities are changed

**59.** *While the end user ultimately pays, if cost recovery is introduced will need to provide clear information so that public expectations and awareness can be managed – depots would be looking at changing procedures if the current level of interventions are reduced. Possible offset of end user costs.*

Refer to answers to issues 10 and 15 above and issue 32 (Logistics).

## Current Processes

**16.** *Will x-ray machines be moved out of CTOs?*

Any decision to move x-ray machines out of CTO premises and depots will be dependent on the effectiveness of the technology and the efficiency of related processes. The evaluation of the field trial will include a comparative assessment of air cargo operations prior to implementation of the scanner and will include consideration of the extent of, and necessity to continue with, existing Customs examinations at 77G premises.

**17.** *Will AQIS intervention take place at the facility?*

Customs and AQIS have met several times to discuss the neutron scanner trial. It has been acknowledged that there are potential impacts on Quarantine activities, including treatment of referrals from the facility. Customs and Quarantine will continue to define working arrangements and will notify industry once these are finalised.

**18.** *How will cycle time be refined to reduce the impact on existing KPI's.*

Following verification of cycle times using contemporary data, process steps where the time is based on assumptions or specifications will be tested during the ramp-up phase of the trial to determine if further refinement is possible. For example, Customs intends to test operating the scanner at various scanning speeds to determine if image quality is suitable for analysis. If faster scanning speeds can be used, then cycle times can be reduced. During ramp up Customs will be closely monitoring processes and making adjustments as necessary. Cargo selection will also be adjusted as required to avoid any significant issues for industry.

## Evaluation

**72.** *Need to track cargo that would have come into Brisbane but doesn't because of possible delivery delays.*

Customs intends to monitor the environment and will include investigations to determine any changes to importing patterns and volumes during the trial. Each business is best placed to monitor and advise Customs of any changes to importing patterns. Advice will be provided to the Minister for Justice and Customs who has asked to be informed if anyone changes cargo arrangements away from Brisbane during the trial.

## Exports

- 60. *When exports are scanned will the CTO still be required to security screen?*
- 64. *Export timeframes will be critical particularly for chilled goods / packed in dry ice.*
- 66. *What will be the procedures - Facility then CTO or CTO then facility?*
- 69. *Will exports be scanned pre or post build-up?*

Export cargo will be included in the field trial once Customs is satisfied with the performance of the scanner. It is anticipated that processes will be integrated with security screening measures in place in the export chain. Implementation of export scanning will be undertaken in consultation with the Department of Transport and Regional Services and industry.

Export cargo will be included in the field trial once Customs is satisfied with the performance of the scanner. Business processes will be determined in consultation with industry.

Customs will commence scoping, mapping and documenting export processes as they relate to the neutron scanner. Customs will welcome detailed information from the Industry Consultative Group regarding these processes, volumes and timeframes including perishable and time critical goods.

- 67. *How will exports be integrated with imports at the facility?*

When scanning of export cargo commences at the facility Customs will ensure cargo streams are kept separate.

## Future Developments

- 63. *Will similar technology be implemented in other Australian ports?*

Any decision regarding further implementation of this technology in other Australian ports will be a decision for the Australian Government.

## Industry Consultative Group

- 71. *Is the Group to operate through the whole trial?*

Yes, it is Customs intention that the Industry Consultative Group will provide input and feedback throughout the six month ramp-up period and the following 12 month operational trial.

- 73.** *Provide Industry with a summary of what the logistics modelling took in to account (eg single flight or peak arrivals to derive queuing times)*

Modelling was undertaken on Final Flight Manifest information (for whole days) provided by the CTOs across a period of time; timing a number of steps; and estimation or use of specifications where data is not available until the facility is built. With co-operation from industry, Customs is validating the data used in the modelling exercise. The field trial provides for further validation and opportunities for cycle time refinement.

### ***Cycle Time Process Steps***

The simulation model estimated the time taken for each ULD to be processed through the facility from flight arrival to delivery at the CTO. This estimate was obtained by modelling each stage in the container process. The process steps are:

1. The flight arrives at its designated ramp and wheels chocked.
2. Ramp Handlers unload the ULDs onto trolley trains.
3. The Ramp Handlers drive the trolley train across the apron to the facility where it **may** queue until the scanner is available.
4. When the in feed conveyor line is available, the ULDs will be unloaded from the trolley train onto the conveyor. Details of the ULD will be recorded electronically for sequencing purposes.
5. The ULD travels on the delivery conveyor to the scanner.
6. The ULD enters the scanner tunnel lengthways and is scanned. All ULDs will enter the tunnel narrow edge leading
7. When the scanning is complete, the ULD travels to the dispatch conveyor while the image is assessed to either release the ULD, rescan or retain it for further detailed inspection.
8. If cleared, the ULD travels along the dispatch conveyor line and is loaded on the trolley train.
9. The trolley train travels to the CTO, completing the journey.

### ***Assumptions***

There are a number of assumptions and variables underlying the modelling which have influenced the timeframe:

1. The actual profile of flight arrivals during the day results in significant changes to the cycle time. The modelling included this effect and reported the variation of performance throughout the day with different hours of operation of the facility.
2. Facility operating hours - no decision had been made at the time the modelling was completed on the hours of operation of the facility. Staff numbers and availability will impact on the hours of operation. Alternative models of operating hours were developed to compare their suitability for handling the

arrival patterns of flights and subsequent planning demand through the day. Data is provided for 24 hour continuous operation; 6.00 am to 7.00 pm; and 6.00 am to 11.00 pm,

3. The number of ULDs carried on a flight varies. The maximum number of cargo ULDs carried on a flight during the data-sampling period was 13, the average was 4.65 cargo ULDs per flight. A trolley train can carry up to 6 trailers (dolleys). Each dolly can carry a single 3.18 m long ULD or two smaller 1.55 m ULD.
4. The time for delivery from the aircraft to the facility varies depending on the gate the aircraft is parked at.
5. The modelling assumed that trolley trains would queue at the facility overnight where it was not a 24 hour operation. The modelling demonstrated that the maximum queue time is longer during the 6am – 9am peak aircraft arrivals. Operating hours, scan time, number of ULDs per flight, and flight arrival patterns impact on the total queue time across the day. Where facility is not open 24 hours the modelling assumes trolley trains will be queued at the facility overnight. With the use of overtime **Customs does not anticipate the need for queuing overnight.**
6. Total time for ULD unloading, movement within the facility and loading is based on specifications – the transport system has not been built to date. The conveyor process allows for continual throughput. Approximately 20 minutes was specified. Any adjustments to the placement of ULDs to ensure correct alignment through the scanner will impact on this time.
7. Scan speed is 1 meter per minute or a total scan time of 2 minutes. CSIRO are investigating increasing the scan speed to 1.75 meters per minute without degrading quality of images. Industry will be consulted when the tests are undertaken. If the total scan time is reduced, the cycle time will be reduced.
8. Time for rescans has been built in. Until the trial, it is not known if these will be necessary; what is the most efficient process for rescanning; and how long they will take.
9. The time for delivery to CTO varies depending on the location of the premises.

### ***Summary Statistics***

The modelling outcomes using 24 hours of operation best reflects the anticipated cycle times.

With a scanning speed of 1.0m/minute and the facility operating 24 hours, the average cycle time over the day is 67.0 minutes. The average cycle time, using the same parameters, during the 6:00am to 9:00am peak is 72 minutes.

The anticipated worse-case scenario for a small number of ULDs is 120 minutes.

## Liabilities

19. *There are penalty clauses in current ramp handling contracts. Under new arrangements who compensates airlines for damages, delays?*
35. *Who will be liable for any damages to cargo or late delivery to CTO?*

Based on experience at the Container Examination Facilities the project team is currently formalising the neutron scanner damages and liability policy. Customs investigates every case individually and if it is found that Customs caused the damage then the policy is for Customs to pay for that damage. Advice regarding the policy will be provided to the Industry Consultative Group. Customs will include damage and liability matters within its contractual arrangements with cargo handling and ramp handling service providers.

65. *Shipper packed ULD's – preference by depots to have unit unpacked at their facility so CTO is not doing it and charging – shipper packed avoids unpack costs.*
68. *What happens to other consignments in ULD where something is found?*

The nature of the detection and the involvement of other agencies, such as the Australian Federal Police (AFP), may require the immediate area to be treated as a crime scene. Factors such as this will determine the treatment of the goods in the ULD.

It is anticipated that Customs would take immediate possession of a very limited number of goods as a result of detections. At this point in time, Customs anticipates that other consignments in the ULD that are not detained at the scanner will be released to the relevant CTO for transport back to their premise for processing.

## Logistics

20. *What happens when two trains arrive at once?*

Customs will establish standard protocols for the receipt and processing of cargo at the facility for scanning. The protocols will be established following verification of the logistics modelling. With the gradual ramp-up of operations over six months, the protocols will be refined, to address issues such as the concurrent arrival of trains at the facility, as throughput at the facility increases. Cargo handlers (contracted by Customs) will be responsible for the operational implementation of those established protocols.

21. *How will ULDs be transported to and from the facility?*

This issue will be addressed by both the ramp handling and cargo handling arrangements established by Customs. A ramp handling working group that will include representatives from Customs, DoTARS, CTOs and several peak bodies has been formed to determine ramp handling solutions for the neutron scanner facility.

During discussions Customs will be aiming to ensure that the proposed arrangements provide the most effective services without causing major disruptions to other airport ramp handling activities.

- 22. *To ensure a level playing field for CTOs, should all cargo be returned to the international terminal so Qantas has no advantage?*
- 27. *Need to explore solutions to ensure competitive neutrality. Airlines using CTOs further from the scanner are disadvantaged.*

This proposal will be considered by the ramp handling working group (refer to issue 21).

- 23. *Will there be familiarisation sessions and tours held at the facility at the start of the trial to demonstrate the processes and to take recommendations from industry on how to improve the processes?*

Following commissioning and licensing of the facility there will be a six month ramp-up period during which time it is anticipated that Customs will commence with scanning a selected flight or flights during the day to refine business processes and the technology. The number of ULDs processed each day will be gradually built up over the period. Associated business processes will also be refined in response to identified problems. Input and feedback from industry, through tours and familiarisation sessions along with continuing forums, will be an integral part of the refinement process both during the ramp up period and when normal operations commence.

- 24. *Can express and perishable consignments be facilitated?*
- 74. *How will a pallet be treated if it contains perishable or express and general cargo? Is the pallet a priority and who decides the priority?*
- 40. *Will there be priority treatment of perishable, chilled or frozen foods. Need to maintain cold chain.*
- 58. *Is there priority for perishables, express and mail ?*

Customs will consider facilitation of priority cargo where it can be clearly identified to Customs. Facilitation of cargo will be considered during development of ramp handling solutions by the working group (refer to issue 21). Customs is awaiting information from industry on the volume and identification of express / perishable cargo (refer to the Minutes of the May ICG Meeting).

- 25. *Work with handlers and operators to assess impact on their key flights once scanning times and operating hours are determined.*

Some indication of the impact on key flights will be available when verification of the logistics modelling has been completed. A number of variable factors will remain unknown until the facility is operational. The graduated ramp-up of the field trial is intended to provide sufficient time for these variable factors to be determined and the operational implications resolved in consultation with handlers and operators. During ramp up Customs will closely monitor processes and make adjustments as necessary. Cargo selection will also be adjusted as required to avoid any significant delays for industry.

**26.** *Can operators get cargo direct from scanner?*

All import air cargo being discharged at an airport moves through a CTO who are required to report an outturn report to Customs, therefore cargo will move from the facility to the relevant CTO.

**28.** *Can certain clients be excluded from the trial?*

Customs has given a commitment to work through the concerns about the impact on cargo handlers that operate through CTOs that are further away from the facility. Customs cannot provide exemptions for the trial as this will compromise the validity of the field trial of the technology in a real time working environment and raise further issues about competitive neutrality. The capabilities of the technology will be tested against the full range of cargo contained within ULDs or pallets and against peak loads and flight arrival times.

**29.** *Are timeframes in logistics model correct? Loaded dolly trains travel more slowly than unloaded trains.*

**31.** *Explore possibilities of reducing cycle time to reduce delays to delivery, particularly exports.*

Customs is currently validating the logistics modelling using contemporary data. During the validation Customs will provide detailed information to the ramp handling working group (refer to issue 21) to discuss options to minimise cycle times and to minimise any adverse impacts.

**30.** *Will live animals be scanned – dogs, horses, fish, crabs?*

Customs will not knowingly scan any live dogs, cats, horses and the like. Consignments of fish and crustaceans may be scanned and will be considered as part of any priority processing developed at the facility to ensure that the cold chain is maintained.

**32.** *Consider priority service where customer pays for scanning and then no further examinations especially under 70% regime.*

Customs will consider prioritisation of cargo in consultation with CTOs and ramp handlers following validation of the logistics modelling. Any decision to move x-ray machines and other Customs activities out of CTO premises and depots will be dependent on the effectiveness of the technology and the efficiency of related processes. It is intended that the evaluation of the field trial will include a comparative assessment of air cargo operations prior to implementation of the scanner and will include consideration of the extent of, and necessity to continue with, existing Customs examinations at 77G premises.

**33.** *Will passenger baggage be scanned?*

The scanning of passenger baggage will not form part of the trial.

**34.** *Is there a covered holding area particularly for perishables?*

Customs is currently obtaining quotes for the construction of an awning along the south face of the building to provide cover for the potential standing / queuing area.

**36.** *Will cargo on military flights be scanned?*

Military cargo flights usually land at Amberley and the cargo will not be scanned. Military cargo arriving on charter flights into Brisbane will be cleared by Customs. The cargo will be included in the trial for scanning if it is containerised or palletised.

**37.** *Will declared dangerous goods be scanned?*

The capabilities of the technology will be tested against the full range of cargo, including declared dangerous goods in ULDs or pallets.

**38.** *Will underbond cargo and transshipments be scanned?*

The targeting strategy that is being developed may involve all cargo from particular flights arriving in Brisbane being scanned. This may include cargo that is ultimately destined for other cities. In order to develop the targeting strategy Customs has requested from industry information on the volume of underbond and transshipment cargo (refer to Minutes of ICG Meeting 12 May 2005).

**39.** *Will there be unpack at the scanning facility and / or can the cargo move to the CTO / depot? Who will break down / build up pallets ?*

An unpack and examination area has been included in the design of the facility. The nature of the goods identified as a potential risk will determine whether the goods can move from the facility and be unpacked at the CTOs or depot (for shipper packed ULDs). This decision will be made on a case-by-case basis. During the ramp-up period it is anticipated that a majority of examinations will take place at the facility while staff familiarise themselves with the technology and procedures. Customs will engage cargo handlers to move and assist with both unpacking and repacking.

**54.** *When is the processing time measured from – flight arrival? Is the 2 hour timeframe on top of CTO 2 hour timeframe for availability?*

The scan cycle time commences at flight arrival, when cargo can be offloaded from the aircraft, through to delivery to the relevant CTO. The cycle time does include time on the tarmac before the ramp handlers start the delivery run. Customs has previously stated that the current delivery time from the aircraft to the CTO has been subtracted from the cycle time. Idle time on the tarmac, however, has been included in the cycle time.

**55.** *How will loose freight be handled?*

In the early stages of the ramp up, bulk hold items will be delivered to the scanner with the ULDs to enable testing. In the longer term, Customs may consider installing an x-ray at the facility to deal with smaller items of bulk cargo.

**70.** *After the trial will there be random selection on ULDs?*

No random selections will be made during or after the trial. A targeting strategy will be in place for implementation during the ramp-up and the remainder of the trial period.

### Opening Hours

**41.** *What will be the operating hours?*

This issue is being considered by the staffing working group. Without pre-empting the outcomes of the working group, it is intended to the maximum extent possible that operating hours of the facility will reflect flight arrival times.

**42.** *What procedures will be implemented if operations are not 24hrs and flight arrives at or after closing time? Is cargo to be held at CTO and transported to facility when open? Introduces additional costs, liability and accountability issues.*

The facility operating hours are yet to be formally endorsed. It is anticipated that flights will be processed as they arrive with operating hours reflecting the current flight schedule. It is proposed that the facility operate from 5.00am- 11.00pm. Flights arriving outside these times are expected to be processed using overtime arrangements by Customs. As a result there should be no queuing of dolley trains or storage of ULDs at the facility overnight.

### Ramp Handling

**43.** *Dollies are needed for use unloading planes, and cannot be tied up at facility in queues. If there is to be a third party contract for ramp handling additional and / or different equipment will be required as CTOs need rolling equipment for other activities eg baggage.*

**45.** *Where handlers do not have own ramp service it is likely their cargo will be delayed further while ramp handlers deal with other cargo.*

These issues will be addressed by the ramp handling working group (refer to issue 21). During discussions Customs will be aiming to ensure that the proposed arrangements provide the most effective services without causing major disruptions to other airport ramp handling activities.

44. *Ramp handler consultation may be needed before transport system design is finalised, in case there's a problem with the dolly/conveyor loading and unloading points.*

If issues with the conveyor loading and unloading points become apparent during site visits and discussion by the ramp handling working group (refer to issue 21) workable solutions will be developed while the provider of the transport system is contracted to Customs.

46. *How will the ramp handling process work if only selected ULDs are going to the facility from one flight?*

The targeting strategy that is being developed involves the scanning of all cargo from particular flights arriving in Brisbane. This strategy negates the need for selected ULDs to be transported to the facility. The transport of cargo that is not to be scanned will be discussed by the ramp handling working group (refer to issue 21). To facilitate informed discussion Customs has requested from industry information on the volume and type of loose cargo (refer to Minutes of the ICG Meeting 12 May 2005).

47. *Is consideration being given to negotiating through airline contract to maintain ramp handling responsibility for airline.*

This issue is being considered through both the ramp handling and cargo handling arrangements. Customs will be aiming to ensure that the proposed arrangements provide the most effective services without causing major disruptions to other airport ramp handling activities.

56. *How long will equipment be idle during operating hours?*

This issue will be addressed by the ramp handling working group (refer to issue 21). During discussions Customs will be aiming to ensure that the proposed arrangements provide the most effective services without causing major disruptions to other airport ramp handling activities.

## **Ramp up**

48. *Offers to provide cargo for scanning during performance testing phase, in handler' off-peak times. Offers also to provide underbond cargo that is not time sensitive.*

Customs welcomes the offer to use any cargo, particularly that which is not time sensitive, during the performance testing phase. In order to develop the selection strategy and plan workflows Customs has requested from industry information on the volume and type of cargo that may be provided for testing (refer to Minutes of the ICG Meeting 12 May 2005).

## Safety

**49.** *Will the technology trigger / activate radioactive or dangerous goods?*

CSIRO advise that the short answer to this question is no, and that there is no mechanism by which the scanner could trigger either explosive or radioactive materials.

## Storage Charges

**50.** *Will Customs negotiate with CTOs to change the commencement time of storage charges from flight arrival to cargo arrival at CTO?*

**62.** *When will the 24hr storage costs commence at CTOs particularly if Customs makes the goods available late at night (for an early morning flight) and goods can't be collected until later the next day. Will Customs be covering any of the costs?*

These issues will be fully considered following completion of the verification of the logistics modelling and cycle times.

The facility operating hours are yet to be formally endorsed. It is anticipated that flights will be processed as they arrive with operating hours reflecting the current flight schedule. It is proposed that the facility operate from 5.00am- 11.00pm. Flights arriving outside these times are expected to be processed using overtime arrangements by Customs. As a result there should be no queuing of dolley trains or storage of ULDs at the facility overnight.

## Staffing

**51.** *Will need to know impact of processes on current operations to adjust current staffing arrangements if necessary.*

**61.** *Need firm times of cargo deliveries to CTOs in order to plan resources / man power and adjust transparent times currently available on the web.*

The verification of the logistics modelling and cycle times; discussions in the ramp handling working group; and the ramp-up period will inform operational implications. During ramp up Customs will be closely monitoring processes and making adjustments as necessary. Cargo selection will also be adjusted as required to avoid any significant issues for industry.

**Technology**

**52.** *Can packaging eg styrofoam be identified?*

The technology will provide information on shape, density and composition of commodities.

**53.** *Will the technology affect unexposed or unprocessed film?*

CSIRO advise that as the dose delivered to the cargo is only equivalent to the natural background that would be received during about 45 minutes in an aircraft at 10,000 meters altitude, there will be no effect on exposed or unprocessed film. The scanner is not expected to cause any adverse effect on these goods or any other commodities.