Bulk Grain Imports
Communiqué from the information session on 25 February 2019

On Monday 25 February 2019, the Department of Agriculture and Water Resources (the department) held an information session about how it manages the biosecurity risks of imported bulk grain. With drought conditions across eastern-Australia affecting domestic grain supplies, the department is receiving strong interest about importing bulk grain and other stockfeed from overseas.

Representatives of peak industry organisations, state and territory governments and interested companies attended. A list of attendees is provided at the end of this communique.

Lyn O’Connell, our Deputy Secretary responsible for biosecurity, opened the session. This was followed by presentations on how we manage import pathway biosecurity risks; the plant and animal biosecurity risks of imported bulk grains; and how we regulate those risks. The final hour involved a question and answer discussion with attendees.

Our department is responsible for managing the risks of pests and diseases arriving in Australia through the movement of goods, vessels and passengers. The aim of our biosecurity system is to protect Australia’s $63 billion agricultural industry, our trade partnerships and our unique way of life.

Imported bulk grain can provide a direct pathway for pests and diseases to enter, spread and significantly affect our animal and plant production areas. Foot and mouth disease, Newcastle disease, infectious bursal disease, and Karnal Bunt are diseases that can be spread through bulk grain. Without appropriate controls, grains can also be contaminated with weed seeds, insects and pathogens. Bulk grain can become infected during crop production or through contamination with other diseases during processing, storage or transportation.

We have a regulatory role to manage imports under the provisions of the Biosecurity Act 2015 (the Act). This role extends to enabling trade within a safe and well managed risk framework. The management of biosecurity risks is critical to ensuring that Australia remains free from pests and diseases of biosecurity concern. The Act provides for an appropriate level of protection, which allows for the engagement in risk to a very low, but not zero, level.
The department’s approach to managing any biosecurity risks associated with an import pathway is designed to ensure that there is no single point of failure and ensures that an appropriate level of protection (ALOP) is adhered to under the provisions of the Act. We have established policies and procedures for managing imported bulk grain under the Act. Import permits legally prescribe the conditions under which biosecurity risks can be managed and an appropriate level of protection is maintained. All applications for import permits are considered on a case-by-case basis and based on relevant scientific evidence.

Factors considered in this assessment include the country of origin, pest and disease status, production methods, harvesting, handling and processing and transportation. Regular monitoring and audit activities are conducted to verify activities are compliant and appropriate records are retained.

There are strict provisions for the transport of bulk grain through agricultural areas; defined processes for appropriate waste disposal; and thorough accounting for the material at all stages of the pathway. Compliance is monitored by biosecurity officers. Surveillance is conducted prior to, during and at the completion of the import process. Non-compliance is dealt with through corrective or enforceable actions.

This communique provides our answers to the questions asked on the day.

You can also view our presentation slides and find more information about our requirements for importing bulk grain on our website at: agriculture.gov.au/import/goods/plant-products/stockfeed-supplements.
Questions and answers

Managing and regulating the biosecurity risks of imported bulk grain

**Will the bulk grain being imported be required to remain within the ‘15 km of port rule’ and be appropriately fumigated or heat treated/sterilised?**

**Answer:** The department doesn’t have a ‘15 km of port rule’. Our approach to managing the biosecurity risks of bulk grain is to source from low risk areas, and to establish strict controls to manage any associated biosecurity risks, including through the transport, storage and processing phases to ensure the biosecurity risks have been mitigated.

**We were advised by the department in November last year that processing must occur in metropolitan sites. What determines if a site is metropolitan, and is this still a requirement?**

**Answer:** We assess all applications to import bulk grain according to arrangements that have remained fundamentally the same as during previous droughts.

We require every import permit application to undergo a risk assessment to ensure that biosecurity risks are managed to the appropriate level of protection (ALOP) for Australia, which is defined as a high level of protection aimed at reducing risk to a very low level, but not to zero. A permit will not be issued if we consider that the risk cannot be managed to the ALOP. If we do issue a permit, all consignments must meet the conditions of that permit.

We require that multiple controls are in place throughout the import pathway (Figure 1) to manage any biosecurity risks associated with the bulk grain. This includes that the grain is sourced from low risk areas, and stringent measures during transport, storage and processing of the grains once they have arrived onshore. Our assessment will also consider proximity to agricultural production, and plant and animal disease hosts.

We accept that when describing the requirements for the importation of bulk grain that ‘metropolitan processing’ has become shorthand for describing the risk management measures across the whole import pathway. In reality however, our assessments consider multiple control points in the management of biosecurity risk.

Should we be satisfied—after having done our risk assessments using the best scientific evidence available—that all biosecurity risks on the pathway can be managed, then the import permit we issue will include conditions appropriate to manage those risks.

For example, if an applicant proposes a storage or processing site that is purely metropolitan for several kilometres around, is surrounded by non-agricultural industrial properties, is close to the port of importation, and the proposed route between them has no host plants or animals, then the dust management and spillage conditions are likely to be less stringent.

However, if the proposed site is close to agricultural production areas, and has a long route from the port of importation to the destination which has large populations of host plants or animals, then the dust management and spillage conditions are likely to be very stringent to the point where importation is highly unlikely to be feasible.
Historically, movement and processing within metropolitan areas was often used as it was considered to be the best practical way to manage the biosecurity risks. This was because of the absence of adequate dust and spillage controls to allow bulk grain to be moved safely to a rural area and to then be processed in that location.

There is now wider access to more effective options for preventing leakage and controlling dust today than there was during previous droughts.

If these options are provided to us as part of the management system, we would consider the evidence of their effectiveness in our assessment process.

You can read the guideline to learn more about our requirements for managing the biosecurity risks of imported bulk grain consignments on our website at agriculture.gov.au/SiteCollectionDocuments/importing/guideline-management-grain-imported-bulk-in-ship-hold.pdf.

**What types of thermal processing practices are being considered? Is there only one method currently considered appropriate? What information is available?**

**Answer:** We could consider any processing practice that addresses the biosecurity risks associated with the bulk grain – these risks may vary depending on the country of origin or the method of production.

There are a range of heat and pressure treatments that address the management of biosecurity risks associated with bulk grain imports. Applicants should however clarify this with the department prior to making an application, and provide comprehensive evidence that clearly demonstrates the management of risk.

**Does the thermal processing occur in Australia, or at origin?**

**Answer:** While our preference is to keep biosecurity risks offshore through processing, we will ensure that there are sufficient controls in place to manage biosecurity risk within Australia should the processing occur here.

**Often situations in which quarantine goes wrong arise as a result of unpredictable or “left field” circumstances. To what extent is price disparity a factor in the consideration of a secure product, compared to a product from a less secure area?**

**Answer:** There are many factors considered in our assessment of an application to import. We will put in place measures to reduce the risks associated with the bulk grain to an acceptable level, including restrictions on the level of foreign material and contaminants.

Whether or not to source bulk grain from overseas is a commercial decision.

**Is the Site Operations Manual (SOM) approved before the bulk grain movement is approved?**

**Answer:** Yes. Before we can issue a permit and the bulk grain can arrive, the SOMs and the Process Management System must be approved by the department.

You can read more about applying for a bulk grain import permit and our requirements on our website at agriculture.gov.au/import/goods/plant-products/stockfeed-supplements.
Plant and animal biosecurity risks of imported bulk grain

**What is the risk to Australia of pathogens such as Cephalosporium stripe which is a seed-borne disease prevalent in North America that is able to survive on dead material and with few chemical controls available to manage it?**

**Answer:** We recognise that Cephalosporium stripe is a concern and have applied scientific evidence to inform an appropriate risk management approach. Factors to be considered include seasonality, host preference and host and disease prevalence.

Imported wheat is only permitted for processing in Australia and not for sowing, which further limits the risk.

**Of the bulk grain the department assessed at origin, i.e. wheat, corn and sorghum, which has a lower risk assessment?**

**Answer:** We risk assess every import application to ensure that biosecurity risks are managed to the **appropriate level of protection (ALOP) for Australia**, which is defined as a high level of protection aimed at reducing risk to a very low level, but not to zero. We will only permit the import if we consider that the risk can be managed to the ALOP. Each consignment must meet the conditions of the permit.

To ensure the biosecurity risks are managed, we put critical control points in place throughout the import pathway.

We prefer processing to occur offshore wherever possible to reduce biosecurity risk.

We will only permit bulk grain sourced from low risk areas for onshore processing, and require additional control measures, such as secure transport, storage and onshore processing, to manage any residual risk along the pathway.

**To what level is the bulk grain cleaned overseas, what costs are involved and how is dockage removed?**

**Answer:** We require that the bulk grain is commercially cleaned and certified by the National Plant Protection Officer as grade 1 or 2 to ensure that the imported grain has a low level of foreign material such as weed seeds, animal excreta and soil.

During our recent visit to Canada and the US, we observed that the processes used for cleaning grain in these countries are highly effective at minimising foreign material and contaminants.

**Current applications to import bulk grain**

**Why do we need to bring bulk grain into the country, when there is sufficient grain in Western Australia? The risk of disease is too much of a risk to take and should be considered only as a last resort.**

**Answer:** Whether or not to source bulk grain from overseas is a commercial decision.

The department’s role and responsibility under the **Biosecurity Act 2015** is to manage the risks of pests and diseases arriving in Australia on imported bulk grain and other goods. We do this by regulating imports to achieve **Australia’s Appropriate Level of Protection** which requires risk to be reduced to a very low level, but not to zero.
**How many applications has the department received? From which regions have applications been received?**

**Answer:** As of 21 March 2019, we have received nine import applications for corn, sorghum and wheat from the USA and Canada. No import permits have been issued to date.

**With regards to the per consignment import permit, is there provision for considering longer term import permits for say, a couple of years, that could be applied to approved supply chains?**

**Answer:** The import permit is made on a per consignment basis for bulk grain. This will allow us to ensure that risks are being appropriately managed prior to us issuing any subsequent permits.

**Noting the provisions of the biosecurity legislation, what role is there for the creation of a robust stock reporting scheme to allow better management of stock shortfalls and the need for bulk grain imports?**

**Answer:** The department understands that industry has been working to determine whether a voluntary, industry-led grains stocks reporting scheme could be implemented.

The department currently has no plans in place to introduce a mandatory scheme.

**Why is confidentiality an issue? Doesn’t the public need to know where the bulk grain is coming from, why it is being imported and how much is being imported?**

**Answer:** Information that is collected under or in accordance with the Biosecurity Act 2015, including for import permits, is considered protected information under the Act and the Privacy Act 1988. This means that we can only use or disclose this information as authorised under these laws, restricting who we can disclose this information to and for what purpose.

We can legally share information that does not identify individuals or companies or their interests. This means we can provide details of the number of import applications received, countries of origin, bulk grain types, and volumes imported.

See our website for more information on our privacy obligations [agriculture.gov.au/about/privacy](http://agriculture.gov.au/about/privacy).
FIGURE 1: Bulk grain import pathway with critical control points for managing biosecurity risk

Biosecurity risks

EXPORTING COUNTRY

- Pre-export
  - Grain testing
  - Sourcing grain from pest free area
  - Cleaning of transportation units
  - Approved export pathway
  - Approved grain specification

- Export
  - Grain Inspection
  - Ship inspection and certification
  - Phytosanitary Certification

AUSTRALIA

- Document Assessment
  - Verify pre-export conditions are met

- Inspection
  - On-ship sampling and inspection
  - Pest ID and management
  - Permission to discharge

- Transport
  - Conveyance standards
  - Approved transport operators
  - Recovery procedures

- Storage (Class 2.7 AA)
  - Secure storage and handling
  - Dust management during receival and dispatch
  - Biosecurity waste management
  - Cleaning and decommissioning
  - Surveillance

- Processing (Class 3.1 AA)
  - Secure storage and handling
  - Dust management during receival and dispatch
  - Processing by a department approved method
  - Surveillance

- Release

Audit and inspections of import pathway

Legend:
- Regulatory step or requirement
- Verification
- Surveillance
Representation

Representatives from the state and territory governments and the following organisations attended:

• Agforce Qld
• Agracom Pty Ltd
• Animal Health Australia
• Australian Lot Feeders’ Association
• Australian Technical Millers Association
• Bellata Gold Milling
• Cattle Council Australia
• CL Commodities Pty Ltd
• Feed Ingredients and Additives Association of Australia
• George Weston Foods
• Grain Producers Australia
• GrainGrowers
• Grainlink NSW
• Grains Industry Market Access Forum
• Grains Research and Development Corporation
• High Commission of Canada
• Ingham Group Limited
• INTL FCStone
• Manildra Group
• Mike Darby International Pty Ltd
• National Farmers’ Federation
• NSW Farmers
• Pet Food Industry Association of Australia
• Pork Australia
• Ports Australia
• Riverbank Stockfeeds
• Ruralco
• Stock Feed Manufacturers’ Council of Australia
• U.S. Embassy
• U.S. Grains Council

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