

ACCREDITATION SCHEME DEED

DEED FOR THE ACCREDITED GRAIN SURVEYOR ASSURANCE SCHEME

The Commonwealth of Australia, as represented by the Department of Agriculture,
Fisheries and Forestry
ABN 34 190 894 983

Australasian Institute of Marine Surveyors Limited
ABN 27 715 847 825

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ACCREDITATION SCHEME DEED**Date**

This Deed is made on

Parties

This Deed is made by:

1. The Commonwealth of Australia, as represented by the Department of Agriculture, Fisheries and Forestry ABN 34 190 894 983 of John Gorton Building, King Edward Terrace, Parkes ACT, 2600 (the **Department**)
and
2. Australasian Institute of Marine Surveyors Limited, C/- Saward Dawson 20 Albert St, Blackburn VIC 3130 ABN 27 715 847 825 (**AIMS**)

Context

This Deed is made in the following context:

- A. The Accredited Grain Surveyor Assurance (AGSA) Scheme is established by this Deed.
- B. The AGSA Scheme aims to provide increased assurance that marine surveyors performing Bulk Vessels Surveys are qualified and performing activities in accordance with the provisions of the Plant Rules and any other relevant standards and policies for Accreditation in force from time to time.
- C. The AGSA Scheme is administered by AIMS in accordance with this Deed. The AGSA Scheme is overseen by the Department in accordance with this Deed.
- D. Under the Plant Rules, surveyors who are accredited by AIMS under the AGSA Scheme are accredited to carry out surveys of Bulk Vessels under the Export Control Laws. Only accredited surveyors may perform Bulk Vessel Surveys.
- E. AIMS will monitor compliance of accredited surveyors with the requirements of the Plant Rules and established industry standards for conducting surveys through ad-hoc audits, and monitoring and managing complaints. AIMS will manage marine surveyor Accreditation correspondingly in accordance with this Deed.

Operative provisions

By this Deed the parties covenant and agree as follows:

1. Interpretation

- 1.1. In this Deed, unless the context indicates otherwise:

Accreditation	means the fact of being accredited under the AGSA Scheme in accordance with this Deed.
Accreditation Application	means an application for accreditation under the AGSA Scheme.
Accredited Surveyor	means a surveyor accredited under the AGSA Scheme in accordance with this Deed.
Accredited Surveyor List	means the list published by AIMS under clause 8.4.
AGSA Accreditation Policy	means the policy at Schedule 1 to this Deed as varied in accordance with this Deed from time to time.
AGSA Complaint Handling and Investigation Policy	means the policy at Schedule 2 to this Deed as varied in accordance with this Deed from time to time.
AGSA Scheme	means the accreditation scheme established under clause 2 of this Deed.
Australian Privacy Principle	has the same meaning as it has in the Privacy Act.
Bulk Vessel	has the same meaning as in the Plant Rules.
Bulk Vessel Surveys	means the survey of a Bulk Vessel by an Accredited Surveyor.
Business Day	means a day other than a Saturday, Sunday, or public holiday in the Australian Capital Territory.
Claim	includes any action, claim, proceeding, expense (including legal costs), demand or damages.
Commencement Date	means 1 July 2023.
Commonwealth	means the Commonwealth of Australia.
Confidential Information	means: a. information that is by its nature confidential; b. information provided on a confidential basis; or c. information that a party knows or ought to know is confidential.
Deed	means this Deed and includes, all schedules and attachments (if any) to this Deed.
Eligible Person	means a person who is eligible to apply for Accreditation because they satisfy the requirements of clause 4.
Eligible Data Breach	has the same meaning as it has in the Privacy Act.

Export Control Laws	means the <i>Export Control Act 2020</i> (Cth) and any rules or regulations made under that Act.
Identification Card	means an identification card issued to an Accredited Surveyor in accordance with clause 8.1.
Legislative Requirements	includes all acts, ordinances, legislation, by-laws, legislative instruments, statutes, rules, orders, codes, awards, standards, regulations or proclamations applicable to the Deed or the AGSA Scheme.
Material	means anything in relation to which intellectual property rights arise.
Minister	has the meaning given in the <i>Acts Interpretation Act 1901</i> (Cth)
New Application	means an application for Accreditation that is submitted to AIMS in accordance with clause 3 by an applicant who is not Accredited and has not been Accredited at any time during the twelve months prior to the date upon which their application for Accreditation was submitted to AIMS.
Parliament	means the parliament of the Commonwealth of Australia.
Personnel	means any employee, officer, agent, contractor or subcontractor of a party, and any employee, officer, agent, contractor or subcontractor of a contractor or subcontractor of the party.
Plant Rules	means the <i>Export Control (Plants and Plant products) Rules 2021</i> made under the <i>Export Control Act 2020</i> (Cth).
Personal Information	has the same meaning as it has in the Privacy Act.
Privacy Act	means the <i>Privacy Act 1988</i> (Cth).
Renewal Application	means any application for Accreditation that is not a New Application.
Scheme Material	means any Material: a. created for the purposes of this Deed; b. provided or required to be provided to the Department under this Deed; or

- c. derived at any time from the Material referred to in paragraphs a or b of this definition.

- 1.2. If any word or phrase is given a defined meaning in clause 1.1, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning.

2. Establishment of AGSA Scheme

- 2.1. AIMS must, on or prior to the Commencement Date, establish an Accreditation scheme known as the “Accredited Grain Surveyor Assurance Scheme”.
- 2.2. The purpose of the AGSA Scheme is to provide for the Accreditation by AIMS of individuals to carry out a survey of a Bulk Vessel for the purpose of deciding whether the vessel is suitable to transport prescribed plants or plant products to which subsection 9-23(2) of the Plant Rules applies.
- 2.3. AIMS must establish, operate and maintain the AGSA Scheme in accordance with this Deed.
- 2.4. AIMS is responsible for all of its costs of establishing, managing and operating the AGSA Scheme and otherwise complying with AIMS’s obligations under this Deed.

3. Applications for Accreditation

- 3.1. AIMS must allow Eligible Persons to apply to AIMS for Accreditation under the AGSA Scheme.
- 3.2. AIMS must consider applications for Accreditation which meet the following requirements:
 - a. the applicant is an Eligible Person;
 - b. the application is made in such form as is reasonably required by AIMS;
 - c. the application is accompanied by evidence of eligibility as required by this Deed and the Plant Rules;
 - d. the applicant pays to or as directed by AIMS an amount not exceeding:
 - i. in the case of a New Application, a one-off initial application fee (which must not exceed \$150.00 (GST inclusive)); and
 - ii. in the case of a New Application or a Renewal Application an annual fee calculated in accordance with clause 5.1; and
 - e. the applicant provides an indemnity in favour of AIMS against all Claims made against AIMS which arise from or in connection with:
 - i. the applicant’s eligibility, or any representation made by the applicant in respect of their eligibility, under clause 4 of this Deed;

- ii. any act or omission (whether or not negligent) of the applicant which is done or omitted to be in the course of, or in connection (whether directly or indirectly) with, the applicant's work as an Accredited Surveyor or in connection with the AGSA Scheme; and
 - iii. any misrepresentation, including but not limited to any fraudulent, false, misleading, deceptive, or incomplete representation by the applicant (whether or not the representation was known or intended by the applicant to be fraudulent, false, misleading, deceptive or incomplete), in respect of their qualifications, identity, eligibility under clause 4, or Accreditation;
 - f. the applicant provides evidence to AIMS that it holds a current:
 - i. professional indemnity insurance policy with a limit of not less than \$1,000,000.00 or such other amount as is stated in the Accreditation Policy from time to time; and
 - ii. any other insurance policy (and on such terms or with such limits) as stated in the AGSA Accreditation Policy from time to time, taken out with a reputable insurer (**Required Insurances**); and
 - g. the applicant provides a warranty in writing to AIMS that it will, while and for as long as they are Accredited:
 - i. maintain the Required Insurances; and
 - ii. when reasonably requested to do so by AIMS, provide evidence of the currency of the Required Insurances.
- 3.3. AIMS must not impose any conditions on the submission of applications for Accreditation other than as set out at clause 3.2 or such other conditions as are stated in the Accreditation Policy from time to time. This includes (without limitation):
- a. any condition that applicants hold (or agree to obtain) AIMS membership; and
 - b. any condition which requires applicants to pay (directly or indirectly) a fee which exceeds the amount set out at clause 3.2.d or clause 5.1.
- 3.4. AIMS must:
- a. determine applications for Accreditation in accordance with the AGSA Accreditation Policy; and
 - b. in accordance with the AGSA Accreditation Policy, grant Accreditation to Eligible Persons whose applications meet the requirements of clause 3.2.

4. Eligibility for Accreditation

- 4.1. To be eligible for Accreditation, individuals must hold the following qualifications and satisfy the following requirements:

- a. the individual must:
 - i. not currently have their Accreditation suspended; and
 - ii. not currently be prohibited by AIMS from making an application for Accreditation by operation of the AGSA Complaint Handling and Investigation Policy;
 - b. the individual must either:
 - i. have at least twelve months' experience serving on a Bulk Vessel, with at least six months of this experience comprising serving in the capacity of Chief Officer of a Bulk Vessel, or
 - ii. three years' experience as a marine surveyor of Bulk Vessels; and
 - c. the individual must either:
 - i. hold or have held either a:
 - A. Master Class 1 (Unrestricted) Certificate (within the meaning of the *Uniform Shipping Laws Code 2008* (Cth)), or
 - B. Master grade Certificate of Competency, as outlined under Schedule 1 of *Marine Orders 71 (Masters and Deck Officers) 2014* (Cth) made under the *Navigation Act 2021* (Cth);
 - ii. hold an Advanced Diploma of Maritime Operations (Master Unlimited);
 - iii. hold a Diploma or Advanced Diploma of Marine Surveying with having completed the modules for dry bulk cargo and grain operations; or
 - iv. hold a Diploma of Maritime Operations (Watchkeeper Deck) with having completed the modules for dry bulk cargo and grain operations.
- 4.2. AIMS must use reasonable endeavours, before granting Accreditation to an applicant, to verify the eligibility of the applicant for Accreditation in accordance with this Deed.

5. End of Accreditation

- 5.1. AIMS may charge Accredited Surveyors a fee for the annual renewal of their Accreditation, however such fee must be calculated on the basis that the total fees collected by AIMS under this clause 5.1 in any financial year do not exceed the annual cost to AIMS of performing its obligations under this Deed.
- 5.2. A person's Accreditation under the AGSA Scheme ends on the earlier of:
 - a. expiry in accordance with clause 5.3; or
 - b. cancellation in accordance with clause 5.5.
- 5.3. An Accredited Surveyor's Accreditation automatically expires on the next occurrence of 11:59pm on 30 June following the date upon which Accreditation was last granted or renewed.

- 5.4. AIMS may suspend an Accredited Surveyor's Accreditation at any time in accordance with the AGSA Complaint Handling and Investigation Policy.
- 5.5. AIMS may cancel an Accredited Surveyor's Accreditation at any time:
- a. if AIMS believes on reasonable grounds that the Accredited Surveyor:
 - i. committed a serious breach or failed to comply with the Plant Rules or the Export Control Laws;
 - ii. fraudulently used an Identification Card;
 - iii. enabled their Identification Card to be fraudulently used;
 - iv. aided, assisted, directed, encouraged or otherwise conspired to enable another person who is not Accredited to perform a Bulk Vessel Survey; and
 - b. otherwise in accordance with the AGSA Complaint Handling and Investigation Policy.

6. Reviewing performance and addressing non-compliance

- 6.1. Subject to clause 6.2, AIMS must take reasonable steps to ensure that Accredited Surveyors perform Bulk Vessel Surveys in accordance with the Plant Rules and the requirements of this Deed.
- 6.2. The Department acknowledges and agrees that:
- a. in discharging its obligations pursuant to clause 6.1 and this Deed generally, AIMS is not required to take any steps which are not reasonably practicable having regard to AIMS' financial and other resources, including its limited Personnel;
 - b. in discharging its obligations pursuant to clause 6.1 and this Deed generally, AIMS is not required to take any steps which are not reasonably able to be taken on and from any premises of AIMS being used to perform AIMS's obligations under this Deed; and
 - c. in discharging its obligations pursuant to clause 6.1 and this Deed generally, AIMS is not required to contract with third parties or make any other arrangements for steps to be taken external to any premises of AIMS being used to perform AIMS's obligations under this Deed, such as the inspection of a Bulk Vessel or the supervision of a Bulk Vessel Survey by an Accredited Surveyor.
- 6.3. AIMS must handle complaints and conduct investigations regarding Accredited Surveyors in accordance with the AGSA Complaint Handling and Investigation Policy.
- 6.4. AIMS must allow Accredited Surveyors a reasonable opportunity to make submissions in relation to the investigation of any complaint, prior to any decision being made by AIMS in relation to the complaint.

- 6.5. In response to a complaint or investigation, AIMS may (in accordance with the AGSA Complaint Handling and Investigation Policy) take such action as AIMS reasonably considers necessary. In the case of serious or repeated breaches of the Plant Rules or the requirements of this Deed, action taken may include (but is not limited to) suspension or cancellation of Accreditation, or a temporary or permanent prohibition on being eligible for further Accreditation.
- 6.6. Accredited Surveyors must be permitted to seek a review of any decision under clause 6.5 in accordance with, and subject to, the AGSA Complaint Handling and Investigation Policy.
- 6.7. AIMS must retain records of any Accredited Surveyor complaints, and actions taken to investigate, address, and resolve those complaints for a period of seven years. AIMS must provide these records to the Department as soon as is practicable on request by the Department.
- 6.8. AIMS must notify the Department in writing within five Business Days (unless the matter relates to personal injury, in which case notification must be immediate) if:
- a. AIMS has a reasonable belief of fraudulent use of an Identification Card;
 - b. AIMS has a reasonable belief that a person other than an Accredited Surveyor has performed a Bulk Vessel Survey for the purpose of the Plant Rules; or
 - c. AIMS has a reasonable belief (or ought to have a reasonable belief) that another serious breach or non-compliance by an Accredited Surveyor with the Plant Rules or the Export Control Laws has occurred.

7. Decision reviews

- 7.1. AIMS must allow Accredited Surveyors, applicants for Accreditation, and former Accredited Surveyors to seek a review of any decision by AIMS relating to that person's Accreditation or application for Accreditation (**Initial Decision**) in accordance with, and subject to, the AGSA Scheme Accreditation Policy and the AGSA Complaint Handling and Investigation Policy.
- 7.2. Reviews conducted under clause 7.1 must:
- a. take into account natural justice and procedural fairness principles;
 - b. provide a full review of the merits of the Initial Decision;
 - c. allow for an independent review of the Initial Decision, particularly where an Accredited Surveyor has alleged that issues of bias or conflict of interests may have affected the Initial Decision;
 - d. allow the Initial Decision to be affirmed, quashed, or substituted for another decision, as a result of the review process;

- e. provide for the request for review of the Initial Decision to be referred to the Board of AIMS and the Department for consideration of the matters raised; and
 - f. ensure that any matters raised by the Department are taken into account as part of the review process.
- 7.3. Where, as a result of a review process, an Initial Decision is substituted for another decision, AIMS must implement that substituted decision for the purpose of this Deed.
- 7.4. The parties acknowledge and agree that the AGSA Complaint Handling and Investigation Policy, including as varied from time to time in accordance with clause 23, fulfils the requirements of clause 7.2.

8. Confirmation of Accreditation

- 8.1. AIMS must provide Accredited Surveyors with Identification Cards which clearly display the Accredited Surveyor's name, photograph, unique Accreditation ID number (as issued by AIMS), and expiry date of Accreditation.
- 8.2. AIMS must require Accredited Surveyors to return or destroy their Identification Cards when their Accreditation ends pursuant to clause 5.2.
- 8.3. AIMS must establish reasonable policies and processes for the production, distribution and replacement of Identification Cards.
- 8.4. AIMS must establish, administer and maintain a list of all Accredited Surveyors which AIMS must publish online only in accordance with this clause 8.4. The Accredited Surveyor List:
- a. must be hosted on the AIMS website at <https://www.aimsurveyors.com.au/Grain-Surveyors>, or such other website as approved by the Department;
 - b. must include the name and company (if applicable) of each Accredited Surveyor; and
 - c. may (with the consent of the relevant Accredited Surveyor) include additional information (such as the State of operation or contact details for the Accredited Surveyor).
- 8.5. AIMS must provide the Department with at least three months' notice of any change to the unique resource locator (URL) of the website on which the Accredited Surveyor List is published.
- 8.6. AIMS must take reasonable steps to update the Accredited Surveyor List as necessary to ensure the Accredited Surveyor List is current, and to support the management of risks associated with fraudulent use of Identification Cards.
- 8.7. AIMS must notify the Department if the AIMS webpage or the Accredited Surveyor List is or will be 'down' or 'unavailable' at any time for a period of more than two hours during ordinary business hours.

9. Record keeping

- 9.1. Without limiting any of its other obligations under this Deed, AIMS must, at its own cost, ensure that it keeps full and complete records in accordance with all applicable standards or best practice, and that all material, information and records relating to this Deed or its performance are maintained in such a form and manner as to facilitate access and inspection under this clause 9.1.
- 9.2. AIMS agrees to:
- a. keep all records relating to an Accredited Surveyor until at least three years after the Accredited Surveyor's Accreditation ends pursuant to clause 5.2; and
 - b. keep all other records relating to this Deed for the term of this Deed and for a period of seven years following the termination of this Deed.

10. Audit and access

- 10.1. The Department or any person (including but not limited to those specified at clause 10.7) authorised in writing by the Department (**Authorised Representative**) may conduct audits of AIMS relevant to:
- a. the performance of the AGSA Scheme;
 - b. compliance with AIMS's obligations under this Deed; and
 - c. compliance with the requirements of the Plant Rules and the Export Control Laws.
- 10.2. Audits may (without limitation) consider and investigate matters relating to:
- a. complaints handling;
 - b. handling and reporting on non-compliances;
 - c. verification of Accredited Surveyor compliance with the Plant Rules
 - d. administration of Accreditation and Accreditation renewal
 - e. maintenance of the Accredited Surveyor List; and
 - f. compliance with record keeping obligations.
- 10.3. The Department or an Authorised Representative may, at reasonable times and on giving reasonable notice AIMS, to the extent that it is relevant to the performance of this Deed:
- a. obtain access to any premises of AIMS being used to perform AIMS's obligations under this Deed;
 - b. require the provision by AIMS of records and information in a data format and storage medium accessible by the Department;
 - c. inspect and copy documentation, books and records, however stored, in the custody or under control of AIMS; and

- d. reasonably require assistance in respect of any inquiry into or concerning the AGSA Scheme or this Deed. For these purposes, an inquiry includes any administrative or statutory review, audit or inquiry (whether within or external to the Department), any request for information directed to the Department, and any inquiry conducted by Parliament or any Parliamentary committee.
- 10.4. The Department will use reasonable endeavours to ensure that audits performed pursuant to clause 10.1 do not unreasonably delay or disrupt in any material respect AIMS's performance of its obligations under this Deed.
- 10.5. The rights referred to in clause 10.3 are subject to:
- a. the Department providing reasonable prior notice in writing to AIMS;
 - b. compliance with AIMS's reasonable security procedures; and
 - c. if reasonably required by AIMS, execution of a deed of confidentiality relating to non-disclosure of AIMS's Confidential Information.
- 10.6. As a result of an audit conducted under clause 10.1, subject to clause 6.2, the Department may make recommendations to AIMS regarding the performance of this Deed or the AGSA Scheme. AIMS must take reasonable steps to implement any such recommendations.
- 10.7. Without in any way affecting the statutory powers of the Auditor-General under the *Auditor-General Act 1997* (Cth), or the Privacy Commissioner under the Privacy Act or the Information Commissioner under the *Freedom of Information Act 1982* (Cth) and subject to the provisions of those Acts, the Auditor-General, Privacy Commissioner and Information Commissioner are Authorised Representatives for the purposes of clause 10.1.
- 10.8. Each party must bear its own costs of any reviews and audits undertaken in accordance with this clause 10.
- 10.9. All actions, reviews, investigations and audits undertaken in accordance with this clause 10 are to be undertaken having regard at all times to the limits of AIMS' obligations pursuant to clause 6.2.
- 10.10. This clause 10 will survive the expiration or termination of this Deed.

11. Dispute Resolution

- 11.1. The parties agree that a dispute arising under this Deed will be dealt with as follows:
- a. the party claiming that there is a dispute will give the other party a notice in writing setting out the nature of the dispute, including particulars as to the material facts and circumstances giving rise to the dispute;
 - b. within five Business Days (or such other period as agreed by the parties in writing) each party will nominate a representative who has not had any prior involvement in the dispute;

- c. the representatives nominated in accordance with clause 11.1.b will attempt to settle the dispute by direct negotiation between them;
 - d. failing resolution by the representatives nominated in accordance with clause 11.1.c within a further ten Business Days or such other period as agreed by the parties in writing (or failure of one or both parties to nominate a representative within the period set out in clause 11.1.b), the parties agree to refer the dispute to their senior executive representatives for resolution, those representatives being:
 - i. in the case of the Department, the person holding the position of Assistant Secretary; and
 - ii. in the case of AIMS, the person holding the position of General Manager (or equivalent);
 - e. failing resolution by their senior executive representatives in accordance with clause 11.1.d within a further ten Business Days or such other period as agreed by the parties in writing, the parties may agree to refer the dispute to an independent third person with power:
 - i. to intervene and direct some form of resolution, in which case the parties will be bound by that resolution; or
 - ii. to mediate and recommend some form of non-binding resolution;
 - f. the parties will co-operate fully with any process instigated by the independent third person engaged under clause 11.1.e in order to attempt to achieve a resolution of the dispute; and
 - g. if the parties have been unable to agree to refer the dispute to an independent third person, or they have agreed and a resolution is not reached within a further twenty Business Days (or such other period as the parties may agree in writing), either party may commence legal proceedings in relation to the dispute.
- 11.2. With the exception of any costs in respect of any legal proceedings commenced by either party in relation to the dispute pursuant to clause 11.1.g, each party will bear its own costs of complying with this clause 11, and the parties will bear equally the cost of any independent third person engaged under clause 11.1.e.
- 11.3. Despite the existence of a dispute, AIMS must (unless requested in writing by the Department not to do so) continue to perform its obligations under this Deed.
- 11.4. This clause 11 does not apply to:
- a. action by the Department under or purportedly under clause 12; or
 - b. legal proceedings by either party seeking urgent interlocutory relief.

12. Review and termination of this Deed

- 12.1. AIMS agrees to work in good faith to assist the Department to perform a review of this Deed and the AGSA Scheme on or around twelve months from the Commencement Date.
- 12.2. On or around the third anniversary of the Commencement Date, and every three years after that date, the Department will conduct a formal review of this Deed and the AGSA Scheme. AIMS must participate in that review and will provide reasonable assistance and information to the Department to facilitate that review.
- 12.3. The Department may (without limitation) immediately terminate this Deed by written notice to AIMS if:
- a. the Plant Rules or any Export Control Laws are amended, repealed, or revoked in a manner which (in the opinion of the Department) prejudices the legislative or regulatory basis for the AGSA Scheme;
 - b. there is a judicial decision regarding this Deed, the Plant Rules, the Export Control Laws, or the AGSA Scheme which (in the opinion of the Department) prejudices the operation of the AGSA Scheme; or
 - c. AIMS has committed a breach of this Deed, and either:
 - i. the breach is incapable of remedy; or
 - ii. the Department has given written notice to AIMS specifying:
 - A. the breach; and
 - B. the date and time by which the breach must be remedied by AIMS, being a reasonable time and not less than twenty-eight days after service of the written notice of the breach,and AIMS has not remedied the breach in accordance with that notice.
- 12.4. The Department may terminate this Deed for any reason by giving six months' prior written notice to AIMS.
- 12.5. AIMS may terminate this Deed for any reason by giving six months' written notice to the Department.
- 12.6. In the event that a notice of termination is given under this clause 12, AIMS must provide reasonable assistance to the Department to:
- a. identify a suitable alternative approach for the Accreditation of marine surveyors under the Plant Rules (which may include Accreditation by the Department or another entity); and
 - b. transition the Accreditation of marine surveyors under the Plant Rules to the alternative arrangement chosen by the Department.
- 12.7. The requirements of clause 12.6 survive the termination of this Deed for a period of six months from the date of termination under this clause 12.

- 12.8. AIMS acknowledges and agrees that:
- a. the Department has not represented or warranted to AIMS that the AGSA Scheme will remain in place for any particular term; and
 - b. AIMS will have no claim against the Department (including, without limitation, for any lost revenue) if the Department terminates the AGSA Scheme or this Deed in accordance with this clause 12.

13. Remedies

- 13.1. AIMS acknowledges and agrees that AIMS is responsible for all aspects of the establishment, conduct and management of the AGSA Scheme in accordance with this Deed.
- 13.2. AIMS indemnifies the Department against all Claims made against the Department or for which the Department becomes liable, arising from or in connection with any fraud, wilful default, or negligent act or omission of AIMS in relation to the performance of its obligations pursuant to this Deed.
- 13.3. AIMS acknowledges that a breach of this Deed may cause significant harm to the Department for which damages may not be an adequate remedy.
- 13.4. Without limiting the Department's right to recover damages for a breach of this Deed, AIMS consents to the grant of injunctive relief to restrain any breach of this Deed, or specific performance to compel AIMS to perform its obligations under this Deed, as a remedy for any breach or threatened breach of this Deed.

14. Insurance

- 14.1. AIMS must take out and maintain:
- a. public liability insurance with a policy limit (per claim and in the aggregate) of not less than \$20 million; and
 - b. association liability insurance with a policy limit for any twelve month policy period of not less than \$10 million.
- 14.2. The insurance required by clause 14.1 must:
- a. be taken out with a reputable insurer; and
 - b. (unless otherwise approved by the Department) be in the general form of policy issued by the insurer for that class of insurance; and
 - c. be maintained until:
 - i. in the case of a policy written on an occurrence basis, the termination of this Deed; or
 - ii. in the case of a policy written on a claims made basis, seven years following the termination of this Deed.
- 14.3. AIMS must, on request by the Department, provide the Department with evidence of AIMS's compliance with this clause 14.

15. Intellectual Property

- 15.1. AIMS grants to (or will procure for) the Department a royalty-free, world-wide, non-exclusive licence (including a right of sub-licence), from the Commencement Date until the termination of this Deed, to use, reproduce, adapt, modify, perform, distribute, communicate and exploit any Scheme Material for the purposes of:
- a. performing the Departments obligations and exercising its rights under this Deed; and
 - b. managing and administering the AGSA Scheme and this Deed.
- 15.2. In addition to the licence granted under clause 15.1, on and from the termination of this Deed, AIMS grants to (or will procure for) the Department a perpetual, royalty-free, world-wide, non-exclusive licence (including a right of sub-licence) to use, reproduce, adapt, modify, perform, distribute, communicate and exploit the following Scheme Material for the purpose of (if applicable), transitioning to or implementing an alternative arrangement for the accreditation of marine surveyors under the Plant Rules or Export Control Laws following the termination of this Deed:
- a. the Accredited Surveyor List; and
 - b. the AGSA Accreditation Policy.

16. Privacy

- 16.1. AIMS agrees, in performing its obligations under this Deed to comply with its obligations under the Privacy Act and not to otherwise do any act or engage in any practice which, if done or engaged in by the Department, would be a breach of an Australian Privacy Principle under the Privacy Act.
- 16.2. Without limiting clause 16.1, AIMS must ensure information pertaining to complaints or reports of alleged criminal conduct of an Accredited Surveyor are not shared by AIMS with any entities or persons, other than:
- a. the Department;
 - b. law enforcement agencies for the purpose of supporting further enforcement action where required;
 - c. entities or persons involved in the review of an Initial Decision under clause 7 in accordance with the AGSA Complaint Handling and Investigation Policy (with AIMS having obtained the prior consent of the relevant person to such disclosure); or
 - d. where the disclosure is compelled by law or order of a court.
- 16.3. If AIMS becomes aware that there are reasonable grounds to suspect that there may have been an Eligible Data Breach in relation to any Personal Information held by AIMS as a result of this Deed or its provision of the AGSA Scheme, AIMS agrees to:

- a. notify the Department in writing as soon as possible, which must be no later than within three days; and
 - b. unless otherwise directed by the Department, carry out an assessment in accordance with the requirements of the Privacy Act.
- 16.4. Where AIMS is aware that there are reasonable grounds to believe there has been, or where the Department notifies AIMS that there has been, an Eligible Data Breach in relation to any Personal Information held by AIMS as a result of this Deed or its provision of the AGSA Scheme, AIMS must:
 - a. take all reasonable action to mitigate the risk of the Eligible Data Breach causing serious harm to any of the individuals to whom it relates;
 - b. unless otherwise directed by the Department, take all other action necessary to comply with the requirements of the Privacy Act; and
 - c. take any other action as reasonably directed by the Department.
- 16.5. AIMS agrees to notify the Department as soon as practicable, which must be no later than five days, if it becomes aware of a breach or possible breach of any of its obligations under this clause 16.
- 16.6. AIMS acknowledges and agrees that:
 - a. the Department may be subject to restrictions under the *Export Control Act 2020* (Cth) regarding the disclosure of protected information under that Act;
 - b. notwithstanding anything in this Deed, the Department is not required to provide AIMS with any information in circumstances where the provision of such information would or may constitute a breach of the Department's obligations under the *Export Control Act 2020* (Cth);
 - c. nothing in this Deed limits or otherwise derogates from the requirements of the *Export Control Act 2020* (Cth);
 - d. AIMS must ensure it complies with the *Export Control Act 2020* (Cth) in performing its obligations under this Deed; and
 - e. AIMS may be subject to restrictions under the *Export Control Act 2020* (Cth), including if AIMS is provided with, or otherwise obtains, protected information within the meaning of the *Export Control Act 2020* (Cth).

17. Freedom of information

- 17.1. AIMS agrees, in performing its obligations under this Deed, to do all things reasonably necessary so that the Department can comply with the Department's obligations under the *Freedom of Information Act 1982* (Cth) in relation to this Deed.
- 17.2. Without limiting clause 17.1, AIMS acknowledges and agrees that:
 - a. this Deed may be a Commonwealth contract for the purpose of the *Freedom of Information Act 1982* (Cth); and

- b. AIMS must, if notified by the Department that the Department has received a request for access, provide to the Department any document created by or in possession of AIMS or a subcontractor of AIMS relating to the performance of this Deed.

18. Confidential Information

- 18.1. Subject to clause 18.2, a party must not, without the prior written consent of the other party, use or disclose any Confidential Information of the other party.
- 18.2. The obligations on the parties under clause 18.1 will not be taken to have been breached to the extent that Confidential Information:
 - a. is disclosed by a party to its Personnel in order to comply with obligations, or to exercise rights, under this Deed;
 - b. is disclosed to a party's Personnel to enable effective management or auditing of contract-related activities, or to facilitate disclosure in accordance with clauses 18.2.c and 18.2.d;
 - c. is disclosed by the Department to its Minister;
 - d. is disclosed by the Department in response to a request of a house or a committee of the Parliament;
 - e. is shared by the Department within the Commonwealth or with another Commonwealth entity, where this serves the Commonwealth's legitimate interests;
 - f. is authorised or required by law to be disclosed; or
 - g. is in the public domain, otherwise than due to a breach of any obligation of confidence (including under clause 18.1).

19. Conflict of interest

- 19.1. In this clause 19:

Conflict	means any matter, circumstance, interest, or activity affecting AIMS, its Personnel which may or may reasonably appear to impair the ability of AIMS to perform its obligations under this Deed diligently and independently.
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- 19.2. AIMS warrants that, to the best of its knowledge after making diligent inquiry, at the Commencement Date no Conflict exists or is likely to arise in the performance of AIMS's obligations under this Deed.
- 19.3. If after the Commencement Date a Conflict arises, or is reasonably likely to arise, subject to clause 6.2, AIMS agrees:
 - a. to notify the Department within fourteen days of the Conflict arising (or becoming likely to arise);

- b. to make full disclosure of all relevant information relating to the Conflict;
and
- c. to take any steps the Department reasonably requires to resolve or
otherwise deal with the Conflict.

20. Relationship of parties

- 20.1. AIMS is not by virtue of this Deed an officer, employee, partner or agent of the Department, nor does AIMS have any power or authority to bind or represent the Department.
- 20.2. AIMS agrees:
 - a. not to misrepresent its relationship with the Department; and
 - b. not to engage in any misleading or deceptive conduct in relation to the Deed or the AGSA Scheme.

21. Waiver

- 21.1. A failure or delay by a party to exercise any right or remedy it holds under this Deed or at law does not operate as a waiver of that right or remedy.
- 21.2. The exercise or partial exercise by a party of any right or remedy it holds under this Deed or at law does not prevent any other exercise or partial exercise of that right or remedy by the party.

22. Compliance with Legislation and Policies

- 22.1. AIMS must comply with all Legislative Requirements in performing its obligations under this Deed.
- 22.2. Without limiting anything contained in this Deed, AIMS acknowledges that it is aware of the following legislative provisions which may have application to this Deed:
 - a. Division 122 of the *Criminal Code Act 1995* (Cth); and
 - b. Section 91.1 and Part 10.7 of the *Criminal Code Act 1995* (Cth).

23. Variations

- 23.1. The terms of this Deed may only be varied in writing signed by the parties.
- 23.2. To vary the terms of this Deed, a submission proposing the variation must be submitted by the party seeking to vary the Deed to the other party.
- 23.3. The AGSA Accreditation Policy, AGSA Complaint Handling and Investigation Policy, and any other policy prepared by AIMS under this Deed must be approved by the Department prior to that policy coming into force.
- 23.4. The AGSA Accreditation Policy, AGSA Complaint Handling and Investigation Policy and any other policy prepared by AIMS under this Deed may be varied

by AIMS without executing a formal variation in accordance with clause 23.1, provided that:

- a. AIMS has notified the Department of the proposed variation at least twenty-eight days before the variation is proposed to be implemented;
- b. the proposed variation is consistent with the requirements of this Deed; and
- c. the Department has approved the proposed variation.

23.5. In respect of the AGSA Accreditation Policy, AGSA Complaint Handling and Investigation Policy and any other policy prepared by AIMS under this Deed, the parties agree that, subject to clause 6.2:

- a. they may provide reasonable feedback on the terms and operation of those policies to the other party from time to time;
- b. where the Department provides reasonable feedback on the terms and operation of a policy, AIMS must incorporate that feedback into the relevant policy as far as is possible; and
- c. they will take reasonable steps to cooperate to improve the policies and procedures established therein in a timely manner as and when necessary, having regard to:
 - i. any feedback received in respect of the relevant policy or procedure (whether or not received from a party to this Deed); and
 - ii. the parties' obligations (and the limits of those obligations) under this Deed.

24. Counterparties

24.1. This Deed may be executed in counterparts. All counterparts when taken together constitute one and the same instrument.

25. Applicable law

25.1. This Deed is to be construed in accordance with, and any matter related to it is to be governed by, the law of the Australian Capital Territory.

25.2. AIMS submits to the jurisdiction of the courts of the Australian Capital Territory.

26. Force Majeure

26.1. Notwithstanding any other provision of this Deed, a party is relieved from its obligations under this Deed while, and only to the extent that, the performance of the obligations is rendered impossible or unlawful from an event which:

- a. is beyond the control of the party;
- b. cannot be prevented or overcome by the taking of reasonable steps; and
- c. could not have been reasonably anticipated by the party as at the Commencement Date,

(Force Majeure Event).

- 26.2. The parties agree to work co-operatively and in good faith to mitigate and manage the occurrence and impact of any Force Majeure Event.
- 26.3. The occurrence of a Force Majeure Event, and the provisions of this clause 26, do not limit the rights of a party to terminate this Deed in accordance with clauses 12.4 or 12.5.
- 26.4. Provided that the parties have complied with clause 26.2, if a Force Majeure Event:
- a. affects the performance of a party's obligations under this Deed such that the AGSA Scheme is unable to operate to achieve the express purpose of the AGSA Scheme as provided in clause 2.2; and
 - b. continues for a continuous period exceeding twelve months,
- either party may terminate this Deed by giving three months' written notice to the other party.
- 26.5. Neither party will have any Claim against any other party (including, without limitation, for any lost revenue or damages) where this Deed has been terminated in accordance with clause 26.4.

EXECUTED as a Deed

SIGNED SEALED AND
 DELIVERED by the
 Commonwealth of Australia
 as represented by the
 Department of Agriculture, Fisheries
~~Water and the Environment~~ & Forestry
 by its duly authorised
 representative:

Name of authorised
 representative

Rossana Carr

Signature **s. 47F(1)**

Name of witness

s. 22(1)(a)(ii)

Signature

s. 47F(1)

SIGNED SEALED AND
 DELIVERED by Australasian
 Institute of Marine Surveyors
 Limited in accordance with
 section 127(1) of the
Corporations Act 2001 (Cth):

s. 47F(1)

Name of director

s. 47F(1)

Signature

s. 47F(1)

Name of director/secretary

s. 47F(1)

Signature

Schedule 1 – AGSA Accreditation Policy



Accredited Grain Surveyor Assurance Scheme Accreditation Policy

1. Purpose and objectives

- 1.1 The purpose of this policy is to establish the process:
- (a) for Eligible Persons to apply for Accreditation by AIMS under the AGSA Scheme; and
 - (b) by which AIMS must assess and consider Accreditation Applications and, where appropriate, grant Accreditation.
- 1.2 From 1 July 2023, all marine surveyors in Australia who undertake the survey of empty bulk vessels intended to load prescribed plants or plant products are required to be Accredited.
- 1.3 All Accreditations under the AGSA Scheme lapse on 30 June each year, and marine surveyors required to be Accredited must reapply prior to the expiry of their Accreditation each year in order to maintain their Accreditation.
- 1.4 The dictionary contained at the conclusion of this policy informs the interpretation of the rules contained in the policy and, unless otherwise defined, capitalised terms have the meanings they are given in that dictionary.

2. Eligibility for Accreditation

- 2.1 A person may only submit an Accreditation Application if they meet all of the following criteria:
- (a) they are a natural person (not a corporation or other legal entity); **and**
 - (b) the person has either:
 - (i) at least twelve months' experience serving on a bulk vessel, with at least six months of that experience being service as the Chief Officer of a bulk vessel; **or**
 - (ii) at least three years' experience as a marine surveyor of bulk vessels; **and**
 - (c) the person holds (or, if applicable, has held) either:
 - (i) a Master Class 1 (Unrestricted) Certificate within the meaning of the *Uniform Shippings Laws Code 2008* (Cth); **or**
 - (ii) a master graduates Certificate of Competency as outlined in Schedule 1 of the *Marine Orders 71 (Masters and Deck Officers) 2014* (Cth) made under the *Navigations Act 2021* (Cth); **or**
 - (iii) an Advanced Diploma of Maritime Operations (Master Unlimited); **or**
 - (iv) a Diploma or Advanced Diploma of Marine Surveying with having completed the modules for dry bulk cargo and grain operations; **or**
 - (v) a Diploma of Maritime Operations (Watchkeeper Deck) with having completed the modules for dry bulk cargo and grain operations; **and**

- (d) the person:
 - (i) does not, at the time of submitting the Accreditation Application, have their Accreditation suspended under rule 8.1 of the *AGSA Complaint Handling and Investigation Policy*; **and**
 - (ii) is not, at the time of submitting the Accreditation Application, prohibited from applying for Accreditation under rule 8.3 of the *AGSA Complaint Handling and Investigation Policy*.

2.2 A person is **not** required to be a member of AIMS in order to apply for, and obtain, Accreditation under the AGSA Scheme.

3. Submission of Applications

3.1 An Eligible Person may apply for Accreditation to AIMS at any time in accordance with this policy, provided:

- (a) that person has not had an Accreditation Application rejected by AIMS under this policy at any time during the thirty days prior to the submission of their new Accreditation Application; and
- (b) that person has not already submitted an Accreditation Application to AIMS which application is yet to be determined; and
- (c) that person has not submitted more than four Accreditation Applications to AIMS during the preceding twelve-month period.

3.2 To submit an Accreditation Application, the Applicant must:

- (a) pay the applicable Fees to AIMS in accordance with rule 4; and
- (b) complete the *Application for Accreditation Form* published by AIMS and submit that form, together with the Required Documents to AIMS online.

4. Application Fees

4.1 On or prior to the submission of an Accreditation Application, Applicants must pay the applicable Fees to AIMS by the method specified in rule 4.3.

4.2 The Fees payable under rule 4.1 are as follows:

- (a) If, at the time of submitting the Accreditation Application, the Applicant is not Accredited and has not been Accredited at any time in the preceding twelve-month period, then the Applicant must pay:
 - (i) the Initial Fee; and
 - (ii) the Annual Fee.
- (b) If, at the time of submitting the Accreditation Application, the Applicant is Accredited or has been Accredited at any time in the preceding twelve-month period, then the Applicant must pay the Annual Fee only.

4.3 The Fees payable in accordance with this rule 4 must be paid to AIMS by deposit to the following bank account, with the deposit reference recording the Applicant's first initial and surname:

Account Name: AIMS

BSB: 032-719

Account No.: 543029

Reference: _____

Example:

- Paul Smith must reference his deposit PSmith.
- Jane Doe must reference her deposit JDoe.

5. Required Documents

5.1 When submitting an Accreditation Application, Applicants must provide true copies of the following documents together with their completed *Application for Accreditation Form* to AIMS:

- (a) a certified copy of the Applicant's current and valid photograph identification document;
- (b) a copy of either:
 - (i) the Applicant's current curriculum vitae which includes a record of the Applicant's experience satisfying either rule 2.1(b)(i) or 2.1(b)(ii); or
 - (ii) written references from employers evidencing the Applicant's experience satisfying either rule 2.1(b)(i) or 2.1(b)(ii);
- (c) a copy of a report or certificate completed by the Applicant in respect of at least ten Bulk Vessel Surveys and, where a relevant Bulk Vessel Survey was performed after 1 July 2023, which evidences that the relevant Bulk Vessel Survey was completed by the Applicant whilst accompanied by an Accredited Marine Surveyor;
- (d) a certified copy of the following documents in respect of the Applicant's qualification satisfying rule 2.1(c):
 - (i) the Applicant's academic transcript in respect of the completion of training for that qualification; and
 - (ii) a certificate or other document evidencing the Applicant's successful completion, and holding, of that qualification;
- (e) a certificate of currency evidencing that the Applicant holds the Required Insurance Policy;
- (f) a warranty in the form as annexed to the *Application for Accreditation Form* signed by the Applicant, by which the Applicant warrants to AIMS that it will, for as long as they are Accredited:
 - (i) maintain the Required Insurance Policy; and
 - (ii) when reasonably requested to do so by AIMS, provide evidence of the currency of the Required Insurance Policy;
- (g) an indemnity in the form as annexed to the *Application for Accreditation Form* in favour of AIMS, signed by the Applicant, by which the Applicant indemnifies AIMS against all claims made against AIMS which arise from or in connection with:
 - (i) the Applicant's eligibility for Accreditation or any representation made by the Applicant in respect of that eligibility;
 - (ii) any act or omission (whether or not negligent) of the Applicant which is done or omitted to be done in the course of, or in connection (whether directly or

- indirectly) with, the Applicant's work as an Accredited Surveyor or in connection with the AGSA Scheme;
- (iii) any misrepresentation, including but not limited to any fraudulent, false, misleading, deceptive, or incomplete representation by the Applicant (whether or not the representation was known or intended by the Applicant to be fraudulent, false, misleading, deceptive or incomplete) in respect of their qualifications, identity, eligibility for Accreditation, or Accreditation;
 - (h) evidence, such as a remittance advice or receipt, of payment by the Applicant of the applicable Fees to AIMS; and
 - (i) an identification photograph:
 - (i) taken from the front of the Applicant;
 - (ii) with a plain and solid-colour background;
 - (iii) which shows the Applicant's whole face and shoulders;
 - (iv) in which the Applicant's face is clearly visible and in sharp focus;
 - (v) which was taken of the Applicant no more than five years prior to the date of the Accreditation Application;
 - (vi) which is not poor quality or unable to be printed; and
 - (vii) which, if the Applicant normally wears corrective lenses, shows the Applicant wearing untinted corrective lenses.
- 5.2 Where a certified copy of a document is required to be provided under rule 5.1, the Applicant may produce either:
- (a) a formally certified copy of that document, certified by a Justice of the Peace, solicitor, barrister, or any other person qualified in the Applicant's jurisdiction to certify documents as being true copies of the original document; or
 - (b) an uncertified copy of that document together with a statutory declaration duly executed by the Applicant, containing statements to the effect of the statements included in Schedule 2 to this policy.

6. Initial Assessment of Application

- 6.1 When an Accreditation Application is submitted in accordance with rule 3 and received by AIMS, AIMS will undertake an initial assessment of that Accreditation Application and the records held by AIMS in respect of the Applicant for the purposes of:
- (a) confirming that the applicable Fees have been paid by the Applicant;
 - (b) confirming that the Applicant is an Eligible Person, including by:
 - (i) confirming that the Applicant is not prohibited from applying for Accreditation (either pursuant to a Prohibition Notice or Suspension Notice); and
 - (ii) confirming that the Applicant has not already submitted an Accreditation Application which has not yet been determined;
 - (c) confirming that the *Application for Accreditation Form* has been completed with all the required information;

- (d) confirming that the Applicant has submitted all of the Required Documents; and
- (e) confirming that there are no other deficiencies or issues arising from the Accreditation Application.

6.2 If, following the initial assessment of the Accreditation Application, AIMS forms the view that:

- (a) the Applicant does not appear to be an Eligible Person; or
- (b) the Accreditation Application is deficient in any manner whatsoever,

AIMS will notify the Applicant in writing and request that the Applicant provide additional information or documents:

- (c) which evidence the Applicant's eligibility under rule 2; and/or
- (d) in support of the Accreditation Application,

(as necessary and applicable) within fourteen days (**Request for Information**).

6.3 If the Applicant does not provide the additional information or further supporting documents to AIMS in accordance with the Request for Information (including within the time specified in that Request for Information), the Accreditation Application will be taken to have been withdrawn by the Applicant and will not be processed by AIMS.

6.4 If an Accreditation Application is taken to have been withdrawn by the Applicant in accordance with rule 6.3 and the Applicant wishes to continue with their application for Accreditation, the Applicant must submit a new Accreditation Application in accordance with rule 3 as though the withdrawn application had never been submitted.

7. Determination of Application

7.1 Once the Accreditation Application has undergone an initial assessment, and subject to that application not being withdrawn by operation of rule 6.3 or voluntarily pursuant to rule 8.1, AIMS must determine the Accreditation Application by **either**:

- (a) rejecting the Accreditation Application if any one or more of the following circumstances apply:
 - (i) the Applicant is not an Eligible Person;
 - (ii) AIMS was unable to verify any of:
 - (A) the Applicant's identity;
 - (B) the Applicant's eligibility for Accreditation under rule 2; or
 - (C) the information provided by the Applicant in the Accreditation Application;
 - (iii) the Accreditation Application was not submitted in accordance with this policy; and/or
 - (iv) AIMS has reason to believe that the Applicant had engaged in fraud or had otherwise not provided honest, accurate and complete information (whether intentionally, negligently or recklessly) in completing and submitting the Accreditation Application,

in which case the Applicant will not be granted Accreditation;

OR

- (b) approving the Accreditation Application if none of the circumstances stated in rule 7.2(a) apply, in which case the Applicant will be granted Accreditation,

(Accreditation Determination).

7.2 After the Accreditation Determination has been made, AIMS will give the Applicant notice of the Accreditation Determination in writing (**Notice of Decision**), which notice will:

- (a) state whether the Accreditation Application is rejected or approved; and
- (b) if the Accreditation Application is approved:
 - (i) state the date upon which the Applicant's Accreditation will be effective in accordance with rule 9;
 - (ii) inform the Applicant of its unique Accreditation ID Number;
 - (iii) state the Applicant's details as will be published on the Grain Accredited Marine Surveyor List and request that the Applicant advise of any necessary changes to those details within fourteen days of the Notice of Decision; and
 - (iv) provide an Identification Card issued in respect of the Accreditation;
- (c) if the Accreditation Application is rejected, advise the Applicant that they have a period of fourteen days to request Written Reasons for the Accreditation Determination.

7.3 If the Applicant requests written reasons for the Accreditation Determination within fourteen days of receiving the Notice of Decision, AIMS must:

- (a) provide Written Reasons for the Accreditation Determination to the Applicant; and
- (b) notify the Applicant in writing that they have a period of fourteen days from the date that they received the Written Reasons to request a review of the Accreditation Determination in accordance with the policies and procedures set out in the *AGSA Complaint Handling and Investigation Policy*.

8. Withdrawal of Application

8.1 An Applicant may, at any time prior to receiving the Notice of Decision in respect of Accreditation Application, withdraw that application by notice to AIMS in writing.

8.2 Where an Accreditation Application has been withdrawn, either voluntarily by the Applicant in accordance with rule 8.1 or otherwise by operation of rule 6.3:

- (a) AIMS is not required to process, or continue processing, that Accreditation Application;
- (b) AIMS will:
 - (i) not make a determination in respect of that Accreditation Application; or
 - (ii) if a determination in respect of that Accreditation Application has already been made, will cancel the Accreditation (if granted) immediately by issuing a Cancellation Notice to the Applicant;
- (c) subject to rule 8.3, the Fees paid by the Applicant may, but need not, be refunded (whether in whole or in part) to the Applicant by AIMS; and
- (d) AIMS will keep a copy of the documents, records and information in respect of the withdrawn Accreditation Application for a period of three years, after which date AIMS may destroy those records.

8.3 In exercising its discretion to elect to refund or not refund the whole or any part of the Fees paid to the Applicant under rule 8.2, AIMS will have regard for the following factors (without limitation):

- (a) the stage at which the Accreditation Application was withdrawn, and any steps taken by AIMS to process that application prior to the withdrawal;
- (b) the resources expended by AIMS in assessing, giving notices, and otherwise dealing with the Applicant in respect of the Accreditation Application; and
- (c) the resources and position of AIMS at the time of the withdrawal.

8.4 Any decision made under this rule 8, including a decision in respect of Fees, shall be final and binding, and is a Non-Reviewable Decision.

9. Timing of Applications for Accreditation

9.1 All Accreditations automatically expire on 30 June each year. In the event that an Accredited Marine Surveyor wishes to renew their Accreditation, they must submit a new Accreditation Application to AIMS in accordance with this policy.

9.2 A person's Accreditation, following the approval of their Accreditation Application by AIMS under this policy, will take effect on the date specified in the following table (as applicable):

Category	Definition	Accreditation Commencement	Accreditation Expiry
A	If: (a) The Applicant was an Accredited Marine Surveyor at the time of submitting the Accreditation Application; or (b) the relevant Accreditation Application was submitted between 1 May and 30 June in any given year (whether or not the Applicant was an Accredited Marine Surveyor when it was submitted)	1 July	The next occurring 30 June
B	If: (a) the Applicant is not an Accredited Marine Surveyor at the time of submitting the Accreditation Application; and (b) the Accreditation Application is not submitted between 1 May and 30 June in any given year.	The day after the Accreditation Determination was made	The next occurring 30 June

The following examples assist in understanding when Accreditation will take effect in accordance with rule 9.2:

Example 1 (Category A):

Jane Doe is currently an Accredited Marine Surveyor, and her current Accreditation will expire on 30 June 2024. She submits an Accreditation Application to renew her accreditation on 1 March 2024. AIMS approves the Accreditation Application on 20 March 2024 and issues a Notice of Decision to Jane Doe on 22 March 2024.

This is a Category A circumstance, as Jane Doe was an Accredited Marine Surveyor at the time she submitted her Accreditation Application.

Jane Doe's new accreditation will take effect from 1 July 2024 and will expire on 30 June 2025. The accreditation that she currently holds will continue to apply until 30 June 2024.

Example 2 (Category A):

Paul Scott is not currently an Accredited Marine Surveyor. He submits an Accreditation Application to obtain Accreditation on 5 May 2024. AIMS approves the Accreditation Application on 10 May 2024 and issues a Notice of Decision to Paul Scott on 16 May 2024.

This is a Category A circumstance, as although Paul Scott was not an Accredited Marine Surveyor at the time he submitted his Accreditation Application, it was submitted between 1 May and 30 June.

Therefore, Paul Scott's Accreditation will take effect from 1 July 2024 and will expire on 30 June 2025. Paul will not hold any Accreditation until 1 July 2024.

Example 3 (Category B):

John Smith is not currently accredited under the AGSA Scheme. He submits an Accreditation Application in accordance with this policy on 1 March 2024. AIMS approves the Accreditation Application on 20 March 2024 and issues a Notice of Decision to John Smith on 21 March 2024.

This is a Category B circumstance, as John Smith is not an Accredited Marine Surveyor and he submitted his Accreditation Application on 1 March 2024 (not during the period between 1 May 2024 and 30 June 2024).

John Smith's accreditation takes effect from 21 March 2024 (being the day after his Accreditation Application was approved by AIMS) and will expire on 30 June 2024.

- 9.3 AIMS will use its reasonable endeavours to process and determine Accreditation Applications within twenty-eight days of receiving an application, however makes no guarantees in respect of the timing or potential delays affecting the processing of applications. Accredited Marine Surveyors should take care to apply for renewal of their expiring Accreditation well in advance of 30 June to allow sufficient time for processing prior to that date.

10. End of Accreditation

- 10.1 An Accredited Marine Surveyor's Accreditation under the AGSA Scheme ends on the earlier of:
- (a) expiry on the 30 June after the Accreditation was granted;
 - (b) cancellation by AIMS in accordance with rule 10.2.
- 10.2 AIMS may cancel an Accredited Marine Surveyor's Accreditation at any time:
- (a) if AIMS believes on reasonable grounds that the Accredited Marine Surveyor:
 - (i) has committed a serious breach or failed to comply with any provision of, or obligation arising under, the Relevant Legislation;
 - (ii) fraudulently used an Identification Card;
 - (iii) enabled any person to fraudulently use their Identification Card;

- (iv) aided, assisted, directed, encouraged or otherwise comprised to enable a person who, at the relevant time, did not hold Accreditation to perform a Bulk Vessel Survey or any other task or duty that is not able to be performed by any person other than an Accredited Marine Surveyor; or
 - (b) otherwise in accordance with the *AGSA Complaint Handling and Investigation Policy*.
- 10.3 Where AIMS has cancelled an Accredited Marine Surveyor's Accreditation pursuant to rule 10.2, it will issue a Cancellation Notice and the *AGSA Complaint Handling and Investigation Policy* will apply in respect of that cancellation and any request for a review of the decision to cancel the Accreditation.
- 10.4 Upon submission of an Accreditation Application, the Applicant agrees to do all things necessary to comply with their obligations at the end of the period of their Accreditation in accordance with this policy and any other applicable policies in force under the AGSA Scheme at any given time.

11. Terms and Conditions of Accreditation

Identification Cards

- 11.1 Upon granting a person Accreditation in accordance with this policy, AIMS will provide the Accredited Marine Surveyor with an Identification Card which will clearly display:
 - (a) the Accredited Marine Surveyor's full name;
 - (b) the identification photograph submitted by the Accredited Marine Surveyor in their Accreditation Application which meets the requirements of rule 5.1(i);
 - (c) the relevant Accreditation ID Number; and
 - (d) the date upon which the Accreditation will expire (being the next 1 July occurring after the Accreditation was granted).
- 11.2 An Accredited Marine Surveyor must at all times use their Identification Card:
 - (a) only while their Accreditation is current, and not after the cancellation or expiry of their Accreditation;
 - (b) in good faith and for a proper purpose;
 - (c) in accordance with all applicable AGSA Scheme policies in force at any given time; and
 - (d) in a manner that:
 - (i) is not misleading or deceptive, or is reasonably likely to mislead or deceive;
 - (ii) is not dishonest, unprofessional or unethical;
 - (iii) does not, and is not likely to, bring the marine surveyors industry in Australia into disrepute; and
 - (iv) does not, and is not likely to, cause harm to the reputation of AIMS or the DAFF.
- 11.3 All Accredited Marine Surveyors must at all times during the term of their Accreditation:
 - (a) hold and maintain their current Identification Card; and
 - (b) carry their current Identification Card when carrying out their duties or work as a marine surveyor; and

- (c) produce for inspection upon request by AIMS or the DAFF (or any authorised representative of AIMS or the DAFF) their current Identification Card.
- 11.4 If an Accredited Marine Surveyor has lost, damaged (in a manner or to the extent that the information on that card is no longer clearly visible and able to be read and understood) or destroyed their current Identification Card:
- (a) that Accredited Marine Surveyor must apply to AIMS for a replacement Identification Card to be issued at the Accredited Marine Surveyor's own cost; and
 - (b) upon application to AIMS for a replacement Identification Card, the Accredited Marine Surveyor warrants to AIMS that it will destroy or return to AIMS at the Accredited Marine Surveyor's own cost all other copies of the Identification Card that it holds or later finds or repairs.
- 11.5 When a person's Accreditation ends under rule 9.1 (irrespective of whether that person has applied for the renewal of and/or been granted renewal Accreditation for the period immediately following the expiry or Cancellation date), the Accreditation Card issued in respect of that Accreditation automatically expires on the date the Accreditation ended (**Expired Accreditation Card**), and that person must immediately:
- (a) cease using that Expired Accreditation Card; and
 - (b) either:
 - (i) destroy the Expired Accreditation Card; or
 - (ii) return the Expired Accreditation Card to AIMS at that person's own cost.

Personal Information

- 11.6 While a person is an Accredited Marine Surveyor, they must at all times keep AIMS updated in respect of any changes to their personal information, including any change to their name, address or contact information. Accredited Marine Surveyors must notify AIMS as soon as practicable after the relevant change occurs so that AIMS may update its records.

Dealings with AIMS and the DAFF

- 11.7 While a person is an Accredited Marine Surveyor, they must at all times:
- (a) be courteous, honest, diligent and prompt in all dealings and correspondence with AIMS and/or the DAFF;
 - (b) comply with all policies in force in respect of the AGSA Scheme at any given time;
 - (c) comply with all reasonable directions of the DAFF from time to time as applicable;
 - (d) where a complaint is made or brought against the Accredited Marine Surveyor under the *AGSA Complaint Handling and Investigation Policy*, participate in the complaint handling process set out in that policy in good faith; and
 - (e) maintain the Required Insurance Policy.

12. Dictionary

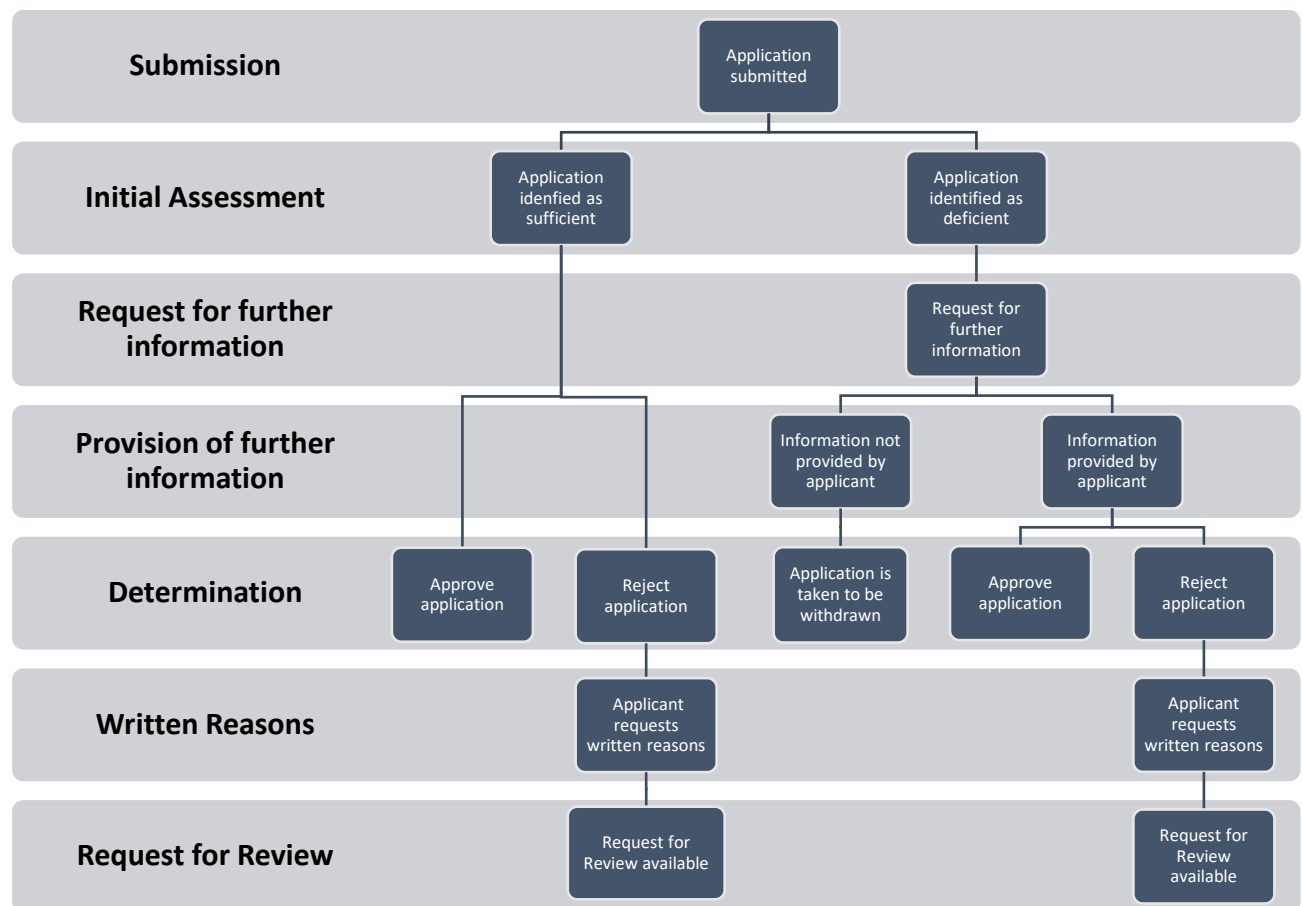
- 12.1 In this policy, unless context requires otherwise:

- (a) **Accreditation** means accreditation as a marine surveyor granted by AIMS under the AGSA Scheme.

- (b) **Accreditation Application** means an application for accreditation as a marine surveyor granted by AIMS under the AGSA Scheme.
- (c) **Accreditation ID Number** means the unique reference number given by AIMS to an Accredited Marine Surveyor upon that marine surveyor being granted Accreditation.
- (d) **Accredited Marine Surveyor** means a marine surveyor who, at the relevant time, is accredited under the AGSA Accreditation.
- (e) **AGSA Scheme** means the Accredited Grain Surveyor Assurance scheme operated by AIMS for the accreditation of marine surveyors.
- (f) **AIMS** means the Australasian Institute of Marine Surveyors.
- (g) **AIMS Website** means the online website of AIMS, hosted at the unique resource locator (URL) address www.aimsurveyors.com.au, or as otherwise advised by AIMS from time to time.
- (h) **Annual Fee** means the sum of \$250.00 (inclusive of GST).
- (i) **Bulk Vessel** has the same meaning as the Plant Rules.
- (j) **Bulk Vessel Survey** means the survey of a Bulk Vessel by an Accredited Surveyor
- (k) **Cancellation Notice** means a written notice given by AIMS to an Accredited Marine Surveyor notifying that marine surveyor that their Accreditation has been cancelled and advising the terms and conditions of that cancellation, issued in accordance with the *AGSA Complaint Handling and Investigation Policy*.
- (l) **DAFF** means the Department of Agriculture, Fisheries and Forestry, or such other Commonwealth Government department overseeing the AGSA Scheme at the relevant time.
- (m) **Eligible Person** means a person who, at the time of submitting the relevant Accreditation Application, satisfies the eligibility criteria stated in rule 2 of this policy.
- (n) **Fees** mean any Initial Fees and Annual Fees payable in accordance with this policy (as applicable).
- (o) **Grain Accredited Marine Surveyor List** means the list of current Accredited Marine Surveyors published on the AIMS Website.
- (p) **Identification Card** means the card issued by AIMS to an Accreditation Marine Surveyor in respect of their Accreditation which contains, without limitation, the information specified in rule 10.1 of this policy.
- (q) **Initial Fee** means the sum of \$150.00 (inclusive of GST).
- (r) **Non-Reviewable Decision** means a decision made by AIMS is not able to be the subject of, and in relation to which a person is not entitled to bring, a review under the *AGSA Complaint Handling and Investigation Policy*.
- (s) **Prohibition Notice** means a written notice given by AIMS to an Accredited Marine Surveyor notifying that marine surveyor that they are prohibited from making an application for Accreditation and advising the terms and conditions of that prohibition, issued in accordance with the *AGSA Complaint Handling and Investigation Policy*.

- (t) **Relevant Legislation** means any and all statutes and statutory instruments (including without limitation any rules and regulations) in force from time to time which create or impose obligations upon marine surveyors in Australia which obligations relate (either directly or indirectly) to their performance work as marine surveyors (including but not limited to the performance of bulk vessel surveys) and includes the *Export Control (Plant and Plant Products) Rules 2021* (Cth).
- (u) **Required Documents** means all of the documents which an Applicant is required to submit in their Accreditation Application, as prescribed by rule 5 of this policy.
- (v) **Required Insurance Policy** means a current professional indemnity insurance policy in respect of their work as a marine surveyor, taken out with a reputable insurer and with a limit of not less than \$1,000,000.00.
- (w) **Written Reasons** means, in respect of any decision or determination, a written summary of the reasons for that decision or determination, which must include (without limitation):
 - (i) a summary of the evidence which the person(s) making the decision relied upon in making the decision or determination; and
 - (ii) a summary of the factors which the person(s) making the decision had regard to in making the decision or determination.

Schedule 1 – Overview of Accreditation Application Process



Schedule 2 – Statements for Statutory Declaration

Please complete the Commonwealth Statutory Declaration Form and include statements to the following effect (provided that such statements are true):

1. The following documents provided by me in support of my application for accreditation by AIMS under the AGSA Scheme (together, the **Provided Documents**) are true, complete and accurate copies of the original documents held by me:

(a) [List documents provided in sufficient detail that those documents can be identified (eg. NSW Driver's Licence Number 34567890)]

2. The Provided Documents are my own documents, and are accurate records of my identity, experience and qualifications.
3. I am able to produce for inspection by any person the original Provided Documents upon request.
4. I understand that a person who intentionally makes a false statement in a statutory declaration is guilty of an offence under section 11 of the *Statutory Declarations Act 1959* (Cth) and I believe that the statements in this declaration are true in every particular.

Schedule 2 – AGSA Complaint Handling and Investigation Policy



Accredited Grain Surveyor Assurance Scheme Complaint Handling and Investigation Policy

1. Purpose and objectives

- 1.1 The purpose of this policy is to establish the process for:
- (a) the submission, assessment, investigation and determination of complaints relating to the conduct of Accredited Marine Surveyors by AIMS under the AGSA Scheme; and
 - (b) review of decisions made by AIMS in relation to complaints, applications for accreditations, and any other reviewable decisions made under any policy relating to the AGSA Scheme that is in force from time to time.
- 1.2 AIMS recognises that complaints relating to the professional and ethical practice and standards to which Accredited Marine Surveyors are expected to achieve (in accordance with the Relevant Legislation) may arise. AIMS is committed to:
- (a) giving Complainants a fair opportunity to make a complaint;
 - (b) giving complaints the due consideration and attention warranted in the circumstances, having regard to the nature of the complaint and the seriousness of the conduct alleged and the actual or potential harm arising from that conduct;
 - (c) affording the due procedural fairness to both the Complainant and the Respondent, including by taking reasonable steps to investigate and determine complaints in a manner consistent with the overarching principles of procedural fairness as set out in rule 2 of this policy; and
 - (d) handling complaints in a manner which is not contrary to the interests of, or reasonably likely to cause damage to, the marine surveyor industry in Australia.
- 1.3 Complaints received by AIMS will be investigated and handled in accordance with the processes set out in this policy and, where applicable, will progress through the Initial Phase (rule 5), Investigation Phase (rule 6) and Determination Phase (rule 7).
- 1.4 Requests for the review of a decision made by AIMS under:
- (a) this policy; or
 - (b) the *AGSA Accreditation Policy*; or
 - (c) any other policy relating to the AGSA Scheme that is in force from time to time,
- (except for a Non-Reviewable Decision) will be handled in accordance with the processes set out in rule 9.

- 1.5 Records in respect of any complaint or request for review of a decision will be used for the sole purpose of, and in accordance with, undertaking the processes set out in this policy and will be treated as confidential in nature and handled in accordance with the *Privacy Act 1988* (Cth) and any applicable AGSA privacy policy in force from time to time. This rule 1.5 does not prevent AIMS from disclosing or producing documents or information where required or compelled to do by law or order of a Court.
- 1.6 The dictionary contained at the conclusion of this policy informs the interpretation of the rules contained in the policy and, unless otherwise defined, capitalised terms have the meanings they are given in that dictionary.

2. Overarching Principles and Standard of Proof

- 2.1 Unless expressly provided otherwise in this policy, all person(s) involved in investigating or making any determination (including in respect of a review of a decision) in accordance with this policy must at all times have regard to, and take reasonable steps to conduct their investigations and decision-making in a manner consistent with, the following overarching principles of procedural fairness:
- (a) The privacy, physical safety and dignity of all persons involved in any disciplinary or decision-making process should be respected so far as is reasonable and appropriate. This extends (without limitation) to the privacy, physical safety and dignity of a Complainant, a Respondent, an Affected Person, the Complaints Manager, each member of the Board, each Decision Maker and the person(s) constituting a Review Panel.
 - (b) The fair hearing rule is important. A person who is the subject of a complaint has a right to:
 - (i) be provided with sufficient information about the allegations brought against them to enable them an opportunity to properly reply to each allegation; and
 - (ii) be provided with a reasonable opportunity, with reasonable notice, to be heard and to reply to the allegations made against them.
 - (c) Decisions should not be influenced by bias or any conflict of interest. Where a Decision Maker considers that they are unable to make a decision free of the influence from bias or conflict of interest, that Decision Maker should recuse themselves and request that the Chairperson appoint another person in their place if necessary or appropriate.
 - (d) Penalties and discipline should not be grossly disproportionate to the severity or significance of the wrongful conduct or resultant actual or potential harm. The measure of disproportionality in this respect is not a subjective assessment of the Decision Maker or the person affected by the relevant decision, but rather an objective assessment of whether a reasonable person would consider the penalty or disciplinary action to be grossly disproportionate.
 - (e) Decisions should **not** be made until reasonable enquiries and investigations have been completed and all parties have been heard or have been provided with a reasonable opportunity to be heard. Decision Makers should do their best not to pre-judge matters, persons or circumstances.
 - (f) Decisions should be made:

- (i) taking into account only relevant factors, considerations and evidence; and
 - (ii) without regard to, or influence from, irrelevant factors, considerations, evidence, submissions, rumours or questions; and
 - (iii) based upon facts and evidence which are supported or proven from reliable and credible sources of information and witnesses.
- (g) Where a decision will negatively affect a person, that negative decision must be supported by facts and information.
- (h) A person who is reasonably likely to be negatively affected by a decision has a right to be informed of the reasons for that decision. If reasons for a decision are not provided, the person likely to be negatively affected by the decision may request that those reasons be provided to them in writing.
- (i) Past conduct or prior decisions and penalties should not have a bearing on the decision as such circumstances or facts will generally be irrelevant to the investigation and decision-making process. This is a factor that should be taken into consideration only:
- (i) for the purposes of determining an appropriate penalty to apply in accordance with this policy;
 - (ii) if the evidence demonstrates a clear and indisputable pattern or escalation of the same or substantially similar behaviour(s); and/or
 - (iii) if multiple complaints in relation to the same or substantially similar conduct by the same Respondent are received at or around the same time.
- (j) Investigations and decision-making in accordance with this policy should not be subject to any unnecessary delays.
- 2.2 Where any finding of fact is made by a decision-maker under this policy, that finding is to be made **on the balance of probabilities**, meaning that **it is more likely than not** the case.

Guidance note:

- *By way of practical example, if a decision-maker made a finding of fact that a Respondent drove a car yesterday, then they have to be convinced on the evidence available that it is more likely than not the case that the Respondent drove a car yesterday.*
- *This is a lower standard of proof than the standard applicable when attributing criminal responsibility (i.e. "beyond reasonable doubt"). For the purposes of making a finding of fact under this policy, the decision-maker does not need to be so certain that they are satisfied that the fact is absolutely certain and there is no doubt whatsoever that it is so.*

3. Submission of Complaints

- 3.1 Any person or entity (including the DAFF and AIMS on its own initiative) may make a complaint to AIMS in respect of an Accredited Marine Surveyor in accordance with this policy.
- 3.2 To make a complaint in respect of an Accredited Marine Surveyor, the Complainant must complete the *Grievance and Complaint Form* published by AIMS and submit that form to AIMS with supporting evidence via email to grain@aimsurveyors.com.au.
- 3.3 Complaints will be assessed, investigated and determined in accordance with this policy **only if**:

- (a) the complaint relates to the conduct of an Accredited Marine Surveyor who:
 - (i) is, at the time the complaint is submitted, accredited by AIMS under the AGSA Scheme; **and**
 - (ii) was, at the time when the conduct occurred, accredited by AIMS under the AGSA Scheme; **and**
 - (b) the conduct which is the subject of the complaint occurred:
 - (i) after the commencement of the AGSA Scheme on 1 July 2023; **and**
 - (ii) within the twelve months immediately prior to the date that the complaint was made.
- 3.4 AIMS is not responsible for and will not investigate complaints which do not satisfy the criteria in rule 3.3 above, including complaints relating to authorised officers.
- 3.5 If a complaint satisfies the criteria in rule 3.3 above but, in addition to being a complaint against an Accredited Marine Surveyor, also relates to an authorised officer, AIMS will investigate the complaint so far as it pertains to the Accredited Marine Surveyor only and will provide a copy of the complaint to the DAFF so that the complaint in relation to the authorised officer comes to the attention of, and may be dealt with by, the DAFF as appropriate. For the avoidance of doubt, AIMS is not obligated to take action in respect of a complaint or any part of a complaint that pertains to authorisation.
- 3.6 Any complaint which relates to the conduct of an authorised officer should be submitted to the DAFF by email to grain.export@awe.gov.au.

4. Complaint Handling

- 4.1 The phases of the complaint process will be overseen and handled by the following person(s):
- (a) the Initial Phase (rule 5) will be overseen and handled by the Complaints Manager;
 - (b) the Investigation Phase (rule 6) will be overseen and handled by the Complaints Manager; **and**
 - (c) the Determination Phase (rule 7) will be overseen and handled by a Decision Maker appointed in accordance with rule 4.2.
- 4.2 The Board will appoint the following person(s) as the Decision Maker in respect of a complaint:
- (a) if the Respondent to the complaint has been the subject of one or more complaints (excluding the current complaint) during the period of 24 months before the current complaint was submitted – the Board or a Board Subset will be appointed as the Decision Maker; or
 - (b) if, following the Investigation Phase, the Board or the Complaints Manager considers that the conduct which is the subject of the complaint, or the possible harm resulting from that conduct, is so severe, complex, concerning or significant that it warrants review by the Board or a Board Subset – the Board or a Board Subset will be appointed as the Decision Maker; or
 - (c) if the complaint does not fall into the categories in subrule (a) and (b) above – the Complaint Manager will be appointed as the Decision Maker.

- 4.3 If the complaint is referred to the Board or a Board Subset as the Decision Maker under rule 4.2 above and a member of the Board is the Respondent to the complaint, that Board member must recuse themselves and the Board may (but is not required to) appoint an independent person who is not a Board member to join the Board or Board Subset as the Decision Maker for the purposes of determining the complaint.

5. Initial Phase

- 5.1 When a complaint which satisfies the criteria of rule 3.3 is received, the Complaint Manager will undertake an initial assessment to review the nature of the complaint and the supporting evidence provided by the Complainant.
- 5.2 If, following the initial assessment of the complaint, the Complaint Manager forms the view that:
- (a) the complaint does not contain sufficient information or details; or
 - (b) insufficient evidence has been provided in support of the complaint,

AIMS will notify the Complainant in writing and request that the Complainant provide additional information or supporting evidence within fourteen days (**Request for Information**).

- 5.3 If the Complainant does not provide the additional information or supporting evidence to AIMS in accordance with the Request for Information (including within the time specified in that Request for Information), the complaint will be deemed to be “not pressed” by the Complainant, the investigation process will not proceed and AIMS will notify the Complainant in writing of this outcome.
- 5.4 If the complaint contains all necessary information and detail and sufficient supporting evidence has been provided (either on initial submission of the complaint or following compliance with a Request for Information) the complaint will proceed to the Investigation Phase and AIMS will notify the Complainant of this development.
- 5.5 Unless, in accordance with this policy, AIMS requires or requests that the Complainant provide further information, documents, evidence or submissions in respect of the complaint, AIMS is not required to contact the Complainant in relation to the complaint any further after giving notice under rule 5.3 or rule 5.4 (as applicable).
- 5.6 For the privacy of the Respondent and any other person(s) involved, the findings and outcome of the Investigation Phase and the Determination Phase will not be disclosed to the Complainant unless all relevant persons (including the Respondent) provide their express prior written consent to that disclosure.

6. Investigation Phase

- 6.1 AIMS may suspend the Respondent’s Accreditation in accordance with rule 8.1 at any time during the Investigation Phase.
- 6.2 If the complaint pertains to an allegation of criminal conduct, including such as fraud or bribery by the Respondent:
- (a) AIMS will notify the DAFF of the complaint;

- (b) AIMS will continue to investigate the complaint in accordance with this policy (in consultation with, and having regard to any input of, the DAFF) for the purpose of determining the effect (if any) on the Respondent's Accreditation;
 - (c) AIMS will, if the complaint pertains to an allegation of a breach of the *Export Control Act 2020* (Cth), forward a copy of the complaint to the DAFF for the purpose of the DAFF undertaking its legislative functions under the *Export Control Act 2020* (Cth) (including the investigation of any offence or a breach of any civil penalty provision);
 - (d) either the DAFF or AIMS may in consultation with the other party and acting reasonably (and in addition to complying with rules 6.2(a) and (b)) refer the matter to any other law enforcement agency as the DAFF or AIMS considers appropriate; and
 - (e) AIMS will provide any information it possesses in respect of the Respondent to the DAFF when reasonably directed to do so by the DAFF in writing.
- 6.3 If a complaint is referred to the DAFF in accordance with rule 6.2 and, on review of the complaint, the DAFF forms the view that the complaint does not pertain to a breach of the *Export Control Act 2020* (Cth), the DAFF may refer the complaint back to AIMS and provide written notice of its decision in this respect including the reason(s) for that decision.
- 6.4 AIMS will give a notice to the Respondent in writing (**First Notice**), which will:
- (a) advise the Respondent that a complaint has been received;
 - (b) include the details of the allegations made (so far as is possible without disclosing, whether expressly or by implication, the identity of the Complainant); and
 - (c) invite the Respondent to provide a written response to the allegations within fourteen days of that First Notice.
- 6.5 If the Respondent does not provide a written response in accordance with the First Notice, AIMS will give a further notice to the Respondent in writing (**Second Notice**), which will invite the Respondent to provide a written response to the allegations within fourteen days of that Second Notice.
- 6.6 The Complaint Manager will take steps to investigate the complaint, and in doing so:
- (a) must have regard for the evidence provided by the Complainant in support of the complaint;
 - (b) must have regard for any written response or evidence in reply provided by the Respondent in relation to the complaint;
 - (c) subject to the Overarching Principles and rule 10.1, may have regard to any complaints made against the Respondent which are the same or substantially similar to the complaint being investigated, including the evidence provided in support of those similar complaints;
 - (d) may contact the Complainant to discuss the complaint or obtain any further information or evidence that the Complaint Manager considers relevant;
 - (e) must consult with the DAFF in respect of the Complaint, and must have regard to any comments provided by the DAFF in respect of the complaint;

- (f) may contact the Respondent to discuss the complaint or obtain any further information or evidence that the Complaint Manager considers relevant; and
 - (g) may contact any other person who has, or is reasonably likely to have, further information or evidence that the Complaint Manager considers relevant.
- 6.7 Once the Complaint Manager has completed its investigation of the complaint, the Complaint Manager will provide written advice to the Board, which written advice will:
- (a) provide a copy of the *Grievance and Complaint Form* submitted by the Complainant;
 - (b) include a summary of the nature of the complaint;
 - (c) include a summary of the process undertaken by the Complaint Manager in respect of the complaint, including whether the Respondent's Accreditation was suspended in accordance with this policy (and, if so, whether it remains suspended);
 - (d) the Complaint Manager's opinion in relation to whether (more likely than not) the conduct complained of occurred, and the basis upon which the Complaint Manager has formed that opinion;
 - (e) the Complaint Manager's opinion of who should determine the complaint considering rule 4.2; and
 - (f) the Complaint Manager's opinion of possible penalties that may be appropriate to apply to the Respondent in the circumstances, and the reasons why the Complaint Manager considers such penalties may be appropriate in the circumstances.
- 6.8 At least fourteen days after the date of the Second Notice, irrespective of whether or not the Respondent has provided any written response, AIMS will give a notice to the Respondent in writing (**Third Notice**), which notice will:
- (a) inform the Respondent that the Investigation Phase has been completed;
 - (b) advise the Respondent of the possible outcomes and penalties that may be applied in the Determination Phase; and
 - (c) invite the Respondent to provide written submissions in relation to the proposed possible outcomes and penalties within fourteen days of the Third Notice.
- 6.9 On the date which is:
- (a) fourteen days after the date of the Third Notice; or
 - (b) the date upon which the Complaint Manager gives written advice to the Board in accordance with rule 6.8,
- (whichever date comes last), the complaint will proceed to the Determination Phase.

7. Determination Phase

- 7.1 Upon review of the Complaint Manager's written advice given in accordance with rule 6.8, the Board will:
- (a) appoint a Decision Maker in accordance with rule 4.2;
 - (b) refer the complaint to that Decision Maker for determination; and

- (c) provide, or direct that the relevant person(s) provide, a copy of all documents, information and evidence relating to the complaint which was obtained from the submission of the complaint or during the Investigation Phase to the Decision Maker.

7.2 If the Decision Maker considers that there is, or likely to be, further evidence or information available which may be relevant to the complaint and should be considered prior to a determination being made, the Decision Maker may:

- (a) refer the complaint back to the Complaint Manager to undertake further investigations by giving notice to the Complaint Manager in writing, providing the details of the further evidence or information that is, or may be, available; and
- (b) take any steps that the Decision Maker considers reasonable and appropriate to obtain, or otherwise ascertain the existence or whereabouts of, the further evidence and information.

7.3 If the complaint is referred to the Complaint Manager under rule 7.2(a):

- (a) the Complaint Manager is not required to repeat the steps in the Investigation Phase unless expressly directed to do so by the Decision Maker;
- (b) the Complaint Manager shall comply with the reasonable and lawful directions of the Decision Maker in respect of the further investigations and shall report back to the Decision Maker in respect of any developments or findings; and
- (c) following completion of the Complaint Manager's further investigations, the Decision Maker must proceed to determine the complaint under rule 7.4.

7.4 Once the Decision Maker considers that it has reviewed and considered all the available evidence, information and documents relating to the complaint, the Decision Maker must determine the complaint by **either**:

- (a) affirming the complaint by:
 - (i) finding that (on the balance of probabilities) the Respondent engaged in the conduct complained of; and
 - (ii) deciding the penalty to be applied to the Respondent (if any) in accordance with rules 7.5 and 7.6;

OR

- (b) dismissing the complaint by finding that (on the balance of probabilities) the Respondent did not engage in the conduct complained of,

(Determination).

7.5 Where, by the Determination, the Respondent is found (on the balance of probabilities) to have engaged in the conduct complained of, the Decision Maker may apply any penalty it considers appropriate, including but not limited to any one or more of the following:

- (a) a written warning to the Respondent;
- (b) the imposition of any conditions on the Respondent's Accreditation, including but not limited to:

- (i) a requirement that the Respondent take action to rectify or remedy the conduct and provide evidence of that rectification or remediation to AIMS;
- (ii) a requirement that the Respondent undertake further training;
- (iii) a requirement that the Respondent be supervised by another Accredited Marine Surveyor when performing Bulk Vessel Surveys;
- (iv) a requirement that the Respondent undertake remedial training in theory units relating to grain operations or Bulk Vessel Surveys;
- (c) suspension of the Respondent's Accreditation in accordance with rule 8.1;
- (d) cancellation of the Respondent's Accreditation in accordance with rule 8.2; or
- (e) prohibiting the Respondent from applying for Accreditation in accordance with rule 8.3.

7.6 In deciding what penalty (if any) will be applied to the Respondent, the Decision Maker must have regard to the following matters:

- (a) the Overarching Principles;
- (b) the nature of the conduct complained of, including whether the conduct amounts to a breach of the Relevant Legislation or any ethical standards which applied to marine surveyors at the time that the conduct occurred;
- (c) any damage or harm that the Respondent's conduct has caused, or is reasonably likely to cause, to any person or to the reputation of marine surveyors, AIMS or the DAFF;
- (d) prior complaints made against the Respondent, including:
 - (i) the number of complaints made against the Respondent;
 - (ii) the length of time between complaints made against the Respondent;
 - (iii) any complaints of a similar nature made against the Respondent or complaints concerning similar conduct by the Respondent;
 - (iv) any patterns or escalation of behaviours or conduct which are clearly evident; and
 - (v) the outcome of any prior complaint investigations, including what penalties (if any) were applied;
- (e) the Respondent's attitude towards, and cooperation during, the complaint investigation process, including the credibility of the Respondent's evidence;
- (f) any remorse demonstrated by the Respondent in respect of the conduct;
- (g) the Respondent's experience as a marine surveyor;
- (h) the severity and likelihood that the Respondent's conduct will impact grain export(s); and
- (i) the likelihood that the Respondent will engage in the conduct in future.

7.7 After the Determination has been made by the Decision Maker, AIMS will give the Respondent notice of the Determination in writing (**Notice of Decision**), which notice will:

- (a) state whether the complaint is affirmed or dismissed; and

- (b) if the complaint is affirmed:
 - (i) advise the Respondent of the penalties which will be applied; and
 - (ii) advise the Respondent that they have a period of fourteen days to request Written Reasons for the Determination.
- 7.8 On and from the date that the Notice of Decision is given to the Respondent, AIMS will take any steps necessary to enforce or action the Determination.
- 7.9 If the Respondent requests written reasons for the Determination within fourteen days of receiving the Notice of Decision, AIMS must:
 - (a) provide Written Reasons for the Determination to the Respondent; and
 - (b) notify the Respondent in writing that they have a period of fourteen days from the date that they received the Written Reasons to request a review of the Determination in accordance with rule 9.

8. Consequences for Accreditation

Suspension of Accreditation

- 8.1 Where AIMS suspends a Respondent's Accreditation in accordance with this policy, AIMS will give the Respondent a Suspension Notice and that suspension will:
 - (a) be subject to any conditions as AIMS considers appropriate in the circumstances;
 - (b) take effect on and from the date specified in the Suspension Notice or, if no commencement date is specified, immediately; and
 - (c) continue until the expiry of the Respondent's current Accreditation or it is lifted (if earlier) on the later of:
 - (i) the date specified in the Suspension Notice or, if no end date is specified, further written notice by AIMS (which in either case must not be later than the expiry of the Respondent's current Accreditation);
 - (ii) where applicable, the date upon which the Respondent fulfils all of the conditions stated in the Suspension Notice;
 - (iii) cancellation of the Respondent's Accreditation under rule 8.2.

Cancellation of Accreditation

- 8.2 Where AIMS cancels a Respondent's Accreditation in accordance with this policy, AIMS will give the Respondent a Cancellation Notice and that cancellation will:
 - (a) take effect on and from the date specified in the Cancellation Notice or, if no end date is specified, further written notice by AIMS;
 - (b) end the Respondent's Accreditation, and disentitle the Respondent from any and all benefits and rights associated with that Accreditation, on and from the date that the cancellation takes effect; and

- (c) prohibit the Respondent from making any application for Accreditation for the period stated in the Cancellation Notice (not exceeding 12 months) or, if no period is specified, for a period of twelve months from the date of the Cancellation Notice.

8.3 The period of a prohibition under rule 8.2(c) must be determined by AIMS having regard to the principles of rule 2.1(d).

Prohibition of application

8.4 Subject to rule 8.4, where a Respondent is prohibited from making an application for Accreditation in accordance with this policy, AIMS will give the Respondent a Prohibition Notice and that prohibition will:

- (a) be subject to any conditions as AIMS considers appropriate in the circumstances;
- (b) take effect on and from the date specified in the Prohibition Notice or, if no commencement date is specified, immediately; and
- (c) continue until lifted on the later of:
 - (i) the date specified in the Prohibition Notice or, if no end date is specified, further written notice by AIMS (which in either case must not be later than 12 months from the date of the Prohibition Notice); or
 - (ii) where applicable, the date upon which the Respondent fulfils all of the conditions stated in the Prohibition Notice.

8.5 The period of a prohibition under rule 8.2(c) must be determined by AIMS having regard to the principles of rule 2.1(d).

8.6 If a Respondent's Accreditation is cancelled under rule 8.2, AIMS is not required to issue a Prohibition Notice as the Cancellation Notice will operate to effect the prohibition under rule 8.2(c).

9. Review of Decisions

9.1 An Affected Person may apply for a review of the Decision by submitting a completed *Request for Review of Decision Form*, together with the written notice of the Decision issued by AIMS, to AIMS at grain@aimssurveyors.com.au within fourteen days of the date that the Affected Person received Written Reasons in respect of the Decision.

9.2 AIMS will review the Decision in accordance with this rule 9 **only if** the *Request for Review of Decision Form* is submitted by the Affected Person within the time specified in rule 9.1.

9.3 AIMS may (to the extent that it is not included in the *Request for Review of Decision Form*) require that the Affected Person provide further information which:

- (a) specifies which part(s) of the Decision are to be the subject of the review (including whether the review relates only to a penalty or penalties applied under rule 7 of this policy);
- (b) in respect of each part of the Decision which is to be the subject of the review, specifies the grounds upon which the review is sought, including:

- (i) whether the Affected Person considers that Initial Decision Maker did not comply with the policy under which the Decision was made, and the details of the noncompliance;
- (ii) whether the Affected Person considers that the Decision was affected by bias or a conflict of interest held by the Initial Decision Maker, and the details of that bias or conflict of interest and how it affected the Decision;
- (iii) whether the Affected Person considers that Initial Decision Maker:
 - (A) failed to consider available evidence that they ought to have considered; or
 - (B) considered evidence that was not relevant to the making of the Decision;
 - (C) gave too much or too little weight to certain evidence in making the Decision;and the details of that evidence and its relevance (or lack thereof) to the Decision;
- (iv) whether the Affected Person considers that the Decision (including a penalty applied under rule 7 of this policy) was disproportionate in the circumstances, and the details of how the Decision and/or penalty is disproportionate; and/or
- (v) whether the Affected Person considers that:
 - (A) in making the Decision the Initial Decision Maker was required to, and did not have, due regard for the Overarching Principles; and
 - (B) had the Initial Decision Maker had due regard for the Overarching Principles, the Decision would not have been made.

9.4 Upon receiving a *Request for Review of Decision Form* which satisfies the criteria of rule 9.2 and receiving any further information requested by AIMS under rule 9.3, AIMS will refer the request to the Chairperson, who:

- (a) if the Initial Decision Maker of the Decision to which the review pertains was the Complaint Manager only, will refer the Decision to the Board or a Board Subset for review; or
- (b) if the review pertains to a Decision made by any other Initial Decision Maker, will:
 - (i) notify the DAFF of the request for review and, if requested by the DAFF, provide the DAFF with a copy of the *Request for Review of Decision Form*; and
 - (ii) appoint a Review Panel in accordance with rule 9.4 and refer the Decision to that Review Panel for review.

9.5 The Review Panel appointed by the Chairperson shall comprise not less than three (3) persons and those persons must:

- (a) not be the Complaint Manager or the Initial Decision Maker;
- (b) be sufficiently independent from the Affected Person and the Initial Decision Maker such that there is unlikely to be any actual, or any apprehension of, bias;
- (c) not hold a conflict of interest with the Affected Person or the Initial Decision Maker if that conflict of interest is likely to have a bearing on the outcome of the review of the Decision;

- (d) be appropriately qualified and experienced to understand and consider the subject matter of the review, including in respect of their familiarity with the AGSA Scheme and policy or policies under which the Decision was made,

and the Chairperson shall have due consideration to any advice received from the DAFF in respect of the composition of any Review Panel.

9.6 The Board or Board Subset and the Review Panel (as applicable) in reviewing the Decision must:

- (a) have consideration for, and conduct the review in accordance with, the Overarching Principles;
- (b) conduct the review by re-making the Decision as though they were the Initial Decision Maker, including by reviewing and considering:
 - (i) all of the submissions, facts and evidence which was available to the Initial Decision Maker at the time that the Decision was made; and
 - (ii) all of the factors which the Initial Decision Maker was required to take into account in making the Decision; and
 - (iii) the powers (and any limitations of those powers) and actions available to the Initial Decision Maker at the time that the Decision was made; and
- (c) invite, and receive, submissions (either orally or in writing) from the Affected Person in respect of the Decision and their grounds for review;
- (d) notify the DAFF of the review, and provide the DAFF the opportunity to provide comments to AIMS in respect of it;
- (e) determine the outcome of the review (**Review Determination**) by either:
 - (i) quashing the Decision, in which case the Decision will be treated as having never been made; or
 - (ii) making a new decision in replacement for the Decision (**Replacement Decision**), in which case the Replacement Decision will be treated as having been made at the time of the Decision; or
 - (iii) affirming the Decision, in which case the Decision will stand and continue to apply; and
- (f) notify the Affected Person and the DAFF in writing of the Review Determination and any Replacement Decision.

9.7 Any Review Determination (including any Replacement Decision) made under rule 9.5 shall be a final and binding Non-Reviewable Decision, and no further review in respect of the Review Determination or the Decision which was the subject of the review undertaken may be sought by the Affected Person.

10. General

Duplication of Complaints

10.1 Where AIMS has received more than one complaint in relation to the same or substantially similar conduct by a Respondent, AIMS may at any stage of the Initial Process or Investigation Process:

- (a) determine that the complaints should be dealt with together, and deal with the complaints accordingly thereafter;
- (b) determine that only one the complaints should be investigated, and cease investigating the other complaints, in which case AIMS must notify the relevant Complainants in writing of its decision not to investigate their complaint due to the ongoing or concluded investigation of a similar complaint; and
- (c) determine that the complaints should be dealt with separately (even if a determination under rule 10.1(a) had previously been made) and deal with the complaints accordingly thereafter.

10.2 In giving any notice to any Complainant in accordance with rule 10.1, AIMS will:

- (a) comply with its obligations under the *Privacy Act 1988* (Cth);
- (b) not disclose the identity of any other Complainant(s);
- (c) not disclose the details of any other complaint made against the Respondent (including the number of complaints made), except that AIMS may disclose that 'a similar complaint in respect of the Respondent was received and is being, or has been, investigated'.

Notices

10.3 Any notice given by AIMS in accordance with this policy:

- (a) to a Complainant must be sent to that Complainant:
 - (i) electronically to the Complainant's email address; or
 - (ii) by post to the Complainant's postal address,as specified by the Complainant in the *Grievance and Complaint Form* submitted by that person;
- (b) to a Respondent must be sent to that Respondent:
 - (i) electronically to the last known email address of the Respondent held by AIMS; and
 - (ii) by post to the last known postal address of the Respondent held by AIMS;
- (c) to an Affected Person (as defined in rule 9) must be sent to that Affected Person:
 - (i) electronically to the Affected Person's email address; or
 - (ii) by post to the Affected Person's postal address,as specified by the Affected Person in the *Request for Review of Decision Form* submitted by that person.

10.4 Where a notice given by AIMS in accordance with this policy is:

- (a) sent to the recipient electronically at the recipient's email address, it will be taken as having been received on the day that it was sent by AIMS;

- (b) sent to the recipient by post to the recipient's postal address, it will be taken as having been received five days after it was posted by AIMS,

and where the notice was sent after 5:00pm on any day, it will be taken as having been sent on the following day.

11. Dictionary

11.1 In this policy, unless context requires otherwise:

- (a) **Accreditation** means an Accredited Marine Surveyor's accreditation by AIMS under the AGSA Scheme.
- (b) **Accreditation Application** means an application for accreditation as a marine surveyor by AIMS under the AGSA Scheme.
- (c) **Accreditation Decision** means a decision by AIMS to:
 - (i) suspend a person's Accreditation pursuant to this policy;
 - (ii) cancel a person's Accreditation pursuant to this policy or the *AGSA Accreditation Policy*;
 - (iii) prohibit a person from making an application for Accreditation pursuant to this policy; and/or
 - (iv) reject a person's application for Accreditation under the *AGSA Accreditation Policy*, as notified in writing and explained in the Written Reasons (if requested by the relevant person) for that decision.
- (d) **Accredited Marine Surveyor** means a marine surveyor who is accredited by AIMS under the AGSA Scheme.
- (e) **Affected Person** means (as applicable):
 - (i) in respect of a Complaint Decision, the Respondent to the relevant complaint; and
 - (ii) in respect of an Accreditation Decision, the person:
 - (A) whose Accreditation was impacted by a suspension or cancellation;
 - (B) who is prohibited from making an application for Application; or
 - (C) whose application for Accreditation was rejected by AIMS.
- (f) **AGSA Scheme** means the Accredited Grain Surveyor Assurance scheme operated by AIMS for the accreditation of marine surveyors.
- (g) **AIMS** means the Australasian Institute of Marine Surveyors.
- (h) **Applicant** means an Eligible Person who has applied for Accreditation.
- (i) **Board** means the board of directors of AIMS at the relevant time.
- (j) **Board Subset** means a subset of the Board as determined by the Board from time to time and not comprising less than two directors of AIMS.
- (k) **Bulk Vessel** has the same meaning as the Plant Rules.

- (l) **Bulk Vessel Survey** means the survey of a Bulk Vessel by an Accredited Surveyor
- (m) **Cancellation Notice** means a written notice given by AIMS to an Accredited Marine Surveyor under rule 8.2 notifying that marine surveyor that their Accreditation has been cancelled and advising the terms and conditions of that cancellation.
- (n) **Chairperson** means the chairperson of the Board at the relevant time.
- (o) **Complainant** means the person making the relevant complaint.
- (p) **Complaint Decision** means a Determination, or any part of a Determination, made by a Decision Maker under rule 7 of this policy as notified to the Respondent in a Notice of Decision.
- (q) **Complaints Manager** means the General Manager of AIMS, or such other person appointed by the Board to manage complaints in accordance with this policy.
- (r) **DAFF** means the Department of Agriculture, Fisheries and Forestry, or such other Commonwealth Government department overseeing the AGSA Scheme at the relevant time.
- (s) **Decision** means any Complaint Decision or Accreditation Decision, but does not include a Non-Reviewable Decision.
- (t) **Decision Maker** means the person(s) appointed by the Board in accordance with rule 4.2 of this policy to determine a complaint.
- (u) **Determination Phase** means the steps taken by AIMS after completion of the Investigation Phase in respect of a complaint, as specified in rule 7 of this policy.
- (v) **Initial Decision Maker** means the person(s) who made the Decision.
- (w) **Initial Phase** means the initial steps taken by AIMS when a complaint is received, as specified in rule 5 of this policy.
- (x) **Investigation Phase** means the steps taken by AIMS after completion of the Initial Phase in the investigation of a complaint, as specified in rule 6 of this policy.
- (y) **Non-Reviewable Decision** means a decision made under this policy or any other policy in force from time to time in respect of the AGSA Scheme:
 - (i) in relation to which Written Reasons were not requested by the relevant person within fourteen days of the decision being made; and/or
 - (ii) that has already been the subject of a review under rule 9 of this policy (irrespective of the outcome of that review).
- (z) **Overarching Principles** means the overarching principles of procedural fairness stated in rule 2 of this policy.
- (aa) **Prohibition Notice** means a written notice given by AIMS to an Accredited Marine Surveyor under rule 8.3 notifying that marine surveyor that they are prohibited from making an application for Accreditation and advising the terms and conditions of that prohibition.

- (bb) **Relevant Legislation** means any and all statutes and statutory instruments (including without limitation any rules and regulations) in force from time to time which create or impose obligations upon marine surveyors in Australia which obligations relate (either directly or indirectly) to their performance work as marine surveyors (including but not limited to the performance of bulk vessel surveys) and includes the *Export Control (Plant and Plant Products) Rules 2021* (Cth).
- (cc) **Respondent** means the person against whom the relevant complaint is made.
- (dd) **Review Panel** means the panel appointed by the Chairperson in accordance with rules 9.4 and 9.5 to review a Decision in accordance with rule 9.
- (ee) **Suspension Notice** means a written notice given by AIMS to an Accredited Marine Surveyor under rule 8.1 notifying that marine surveyor that their Accreditation has been suspended and advising the terms and conditions of that suspension.
- (ff) **Written Reasons** means, in respect of any decision or determination, a written summary of the reasons for that decision or determination, which must include (without limitation):
 - (i) a summary of the evidence which the person(s) making the decision relied upon in making the decision or determination; and
 - (ii) a summary of the factors which the person(s) making the decision had regard to in making the decision or determination.



Australian Government

Department of Agriculture,
Fisheries and Forestry

Plant Exports Branch

Accredited Grain Surveyor Assurance
Scheme Review



Project Plan

This template is one of the key products required in the Planning Stage of the Enterprise's Project Management Framework. Definitions used in this plan can be found in Appendix B and C. It used to detail how the project will deliver the outputs, in terms of activities, resources, analysis of risk, stakeholder engagement and reporting.

The project plan is used to communicate to the Senior Responsible Officer:

- The objectives for the project
- How and when objectives are to be achieved, by showing the major products, activities and resources required for the plan
- Planned costs
- Management stages and major control points
- A baseline against which to monitor project progress through project delivery and governance.

Project Lifecycle Stage 3: Planning – Key Products

Project Lifecycle Stage 3: Planning cont. – Key Products

Project Stages	Concept	Initiation	Planning	Delivery	Closure
Product	Description		Structure	Responsibility	
Project Plan	- Developed to ensure that the project will be successful and deliver the planned benefits - Outlines the overall structure of the project and details the scope, resources, tasks, schedule, budget and risks		Ownership and governance, scope, schedule, budget, risks, issues, resources, benefits, change assessment, constraints, assumptions, dependencies, related links	- PM - SRO	
Change Management Plan	- Used to ensure that any changes initiated by the project will be accepted and deliver the planned benefits - Outlines the overall scope of the change as well as the resources, tasks, schedule, budget and risks associated with implementing the change - Details how the change will affect stakeholders and how it will be communicated		For advice please contact the Change Management Team	For advice please contact the Change Management Team	
Benefits Management Plan	- Used to ensure that achievement of the benefits can be articulated at the completion of the project - Includes how benefits management will be coordinated with the delivery of outputs - Describes the benefits in detail, including a schedule for delivery, how they will be measured, identification of benefit managers and owners and any baseline measurements		The structure of the Benefits Management Plan is currently under development. Please contact the EPMD for guidance.	- PM - SRO - Benefit Owners	
Risk Management Plan	- Used to ensure a clear understanding of the necessary actions be taken for the project to meet its objectives by identifying the uncertainties around meeting the objectives - Details any identified risks, the sources and potential impacts (consequences) of these risks and what mitigation strategies are currently in place to manage the risks (controls), and future mitigation strategies (treatments) which are to be developed and implemented to manage any risks within an acceptable level, to the project.		Included as part of the Project Plan	- PM - SRO - Risk Owner/s - Control/Treatment Owners - For advice please contact the Enterprise Risk Management Section	

Project Plan

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

Approvals

Project Manager	s. 22(1)(a)(ii), Assistant Director, Plant Export Reform Program (PERP)
Project Manager signatures and date	s. 47F(1) 07 / 08 / 2025
Program/commodity responsible officer (PRO)	s. 22(1)(a)(ii), Director, Grain and Seed Export Program (GSEP)
PRO Signature and date	s. 47F(1) 08/08 /2025
Senior Responsible Officer (SRO) and Business Owner (BO)	s. 22(1)(a)(ii) , Director, Plant Export Reform Program (PERP)
SRO / BO signature and date	s. 47F(1) 08 /08 / 2025

Version history

Version	Date	Reviewed by (Name, position)	Role	Comment (Amendment type)
1.0	8 August 2025	s. 22(1)(a)(ii) , Director PERP	SRO/BO	Final plan endorsed.

Project Plan

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

1. OWNERSHIP			
Project Name and Tier	Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review, Tier 3. Refer Appendices B and C for definitions and project tiering.		
Project Ref. Number	n/a	Group	Agricultural Trade Group
Senior Responsible Officer (SRO)	s. 22(1)(a)(ii)	Division	Plant Exports Branch
Project Manager	s. 22(1)(a)(ii)	Branch	Plant Exports Branch

☐ New Project/Initiative ☒ Existing Project/Initiative

2. OVERVIEW/BUSINESS BACKGROUND

The *Accredited Grain Surveyor Assurance Scheme (AGSA Scheme)* was implemented in July 2023. The AGSA Scheme:

- clarifies marine surveyor qualification requirements, including incorporation of additional work experience requirements,
- requires all qualified marine surveyors who survey and certify bulk vessels as suitable to transport prescribed plants or plant products, to be accredited under the AGSA Scheme, and
- provides that the Australasian Institute of Marine Surveyors (**AIMS**) administer the AGSA Scheme on behalf of the Department of Agriculture, Fisheries and Forestry (**the department**).

The purpose of the AGSA Scheme is for AIMS to determine the accreditation of marine surveyors to carry out a survey of a bulk vessel for the purpose of deciding whether the vessel is suitable to transport prescribed plants or plant products. The objective of the AGSA Scheme is to provide increased assurance to the department and the broader shipping industry, that marine surveyors performing bulk vessel surveys are qualified and performing activities in accordance with legislative provisions in the Plant Rules, and other relevant Standards and Policies for accreditation in force from time to time.

The AGSA Scheme was enabled, and operates through, the following:

- the adoption of legislative amendments in the Export Control (Plant and Plant Products) Rules 2021 (**Plant Rules**). These amendments require marine surveyors to be accredited by the AIMS in order to carry out bulk vessel surveys for the purposes of the Plant Rules.
- the *Deed for the Accredited Grain Surveyor Assurance Scheme (the Deed)* between the AIMS and the department (**the parties**). The Deed includes two Policies that describes how AIMS will accredit marine surveyors, manage complaints and conduct investigations of said complaints.
- the *Standard for Empty Bulk Vessel Surveys by Accredited Marine Surveyors (the Standard)* was jointly developed by the department and AIMS in 2023. The Standard aims to ensure

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

that the condition of the bulk vessel supports phytosanitary certification by improving marine surveyor bulk vessel survey practices.

- various operational Scheme materials, for example a *Conflicts of Interest Guidance Note*, the *AGSA complaint process fact sheet* and the *Grievance and Complaint Form*.

The AGSA Scheme has been operational for 2 years and as such it is timely to review past performance of the Scheme to determine the Scheme's future performance. In addition to periodic reviews being good practice, the Deed also includes clauses relating to reviews of the Scheme and Deed:

- an informal review 12 months post implementation,
- a formal review on or around the third anniversary of the commencement date, and
- every 3 years after that date.

Whilst an informal review did not occur 12 months post implementation, both parties have continued working together to review and improve the Scheme as a matter of good practice. Furthermore, both parties have received industry feedback in relation to areas where performance of the Scheme could be improved.

In acknowledgement of this, both parties have agreed it is timely to conduct a formal review of the AGSA Scheme encompassing the Deed, Standard (limited in scope), Conflicts of Interest processes and the operational Scheme materials. DAFF and AIMS will also seek opportunities for stakeholder engagement in this review to influence the development of enhancements and strengthen the performance of the Scheme. This review will provide DAFF an opportunity to update the AGSA Scheme to reflect changes to the *Export Control Act 2020 (the Act)* in relation to information sharing provisions, a key enabler supporting the AIMS to determine the accreditation of marine surveyors to carry out a survey of a bulk vessel for the purpose of deciding whether the vessel is suitable to transport prescribed plants or plant products.

3. PROJECT OBJECTIVES

1. To support both parties to collaborate and conduct a formal review of the AGSA Scheme to determine the Scheme performance to date.
2. To engage with relevant stakeholders to determine, from their perspective, the Scheme performance to date and provide opportunities for these stakeholders to provide feedback and influence improvements to the Scheme.
3. To support both parties to determine recommendations for improvements to the Scheme and implementation of recommendations.

Project Plan

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4. SCOPE

Stage 1 – Review and recommendation

1. To conduct a formal review of the existing products listed in Appendix A (minus the governance artefacts) noting that the review of the Standard is limited to updates that arise from the review of conflicts of interest processes. The review will consider past performance of the Scheme, and stakeholder feedback, to make recommendations that determine the Scheme's future performance against the intended objectives when implemented in 2023. This will result in the drafting of a document that consolidates the findings of the reviewed products that will be endorsed by both parties and encompasses stakeholder feedback.
2. To develop a clear recommendation, or suite of recommendations, that respond to the review findings, including any stakeholder feedback obtained, that aims to strengthen the performance of the AGSA Scheme.

Stage 2 – Implementation of recommendations

3. To develop an implementation plan and accompanying product breakdown that determines the approach to implementing the recommendations of the review findings.
4. To implement the recommendations of the review as developed during stage 1.

5. OUT OF SCOPE

1. All work associated with bulk vessel inspection issues outside the scope of the AGSA Scheme.

6. OUTPUTS/PRODUCTS – REFER APPENDIX A

Output	Purpose
1. Governance	Draft, and seek sign off, of project governance documentation for stage 1. Includes formation of working group and drafting of project artefacts.
2. Deed	Review the deed to ensure that information sharing provisions within the Act are enacted in the deed. Consider AIMS and stakeholder feedback for other updates to the deed. Deed updates likely to complete during stage 1.
3. Review conflicts of interest processes	Respond to industry feedback and collaborate with AIMS on requirements to make recommendations for change to existing conflicts of interest processes, including management planning during stage 2.
4. Review standard	Review the Standard in the context of conflicts of interest processes and, where required, make recommendations for implementation in stage 2.
5. Review operational documents	In acknowledgement of agreed recommendations in relation to the deed, conflicts of interest and standard, review the operational documentation in alignment with recommendations and propose updates for stage 2.

Project Plan

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6. OUTPUTS/PRODUCTS – REFER APPENDIX A	
Output	Purpose
6. Recommendations	Stage 1 will form the final set of recommendations from the review of the existing conflicts of interest processes, standard and operational documents to be implemented in stage 2.
7. Implementation of recommendations (stage 2)	Not in documented in stage 1 planning. Stage 2 will be informed by the review recommendations in stage 1. Consequently the development of further outputs such as updates to Scheme materials, including planning artefacts, cannot be determined until stage 1 concludes.

7. BENEFITS			
Expected benefits	Measure	Owner	Timeframe for delivery
1. Sharing of information between AIMS and DAFF ensures AIMS is informed about marine surveyor performance. This is critical when determining a marine surveyor's accreditation to carry out a survey of a bulk vessel for the purpose of deciding whether the vessel is suitable to transport prescribed plants or plant products.	Information is shared between DAFF and AIMS for the purposes of determining accreditation of marine surveyors.	Jemma Martin	End 2026/27 financial year
2. Stakeholder support for the AGSA Scheme is strengthened.	Stakeholders comments support the AGSA Scheme.		
3. Conflicts of interests declared and managed while supporting stakeholder requirements across the shipping industry.	Conflicts of interests are declared to the AIMS by marine surveyors.		

8. RESOURCES				
Role	Estimated efforts (%)			Nominated resource
	Planning	Delivery	Closure	
Project working group	75	70	70	s. 22(1)(a)(ii) (EL1) PERP
	5	5	5	s. 22(1)(a)(ii) (APS6 PERP)
	5	10	15	Subject matter experts GSEP
PRO	5	5	5	s. 22(1)(a)(ii) (GSEP)

Project Plan

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8. RESOURCES				
Role	Estimated efforts (%)			Nominated resource
	Planning	Delivery	Closure	
SRO	10	10	5	s. 22(1)(a)(ii) (EL2) PEB
TOTAL	100	100	100	

9. GOVERNANCE		
Project working group	Monthly status report to be developed and available for PRO and SRO to use as required.	Project manager
Grain and Plant Products Export Industry Consultative Committee (GPPEICC)	Under the leadership of the Chair, SRO and PRO will lead engagement to seek stakeholder feedback and influence stakeholder expectations as it relates to the AGSA Scheme review and recommendations.	Jemma Martin

Project Plan

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

10. ROLES AND RESPONSIBILITIES	
Role	Responsibility
Project working group	The project working group is responsible for the drafting and delivery of specific project activities and tasks, including those related to planning, development, implementation, risk management, reporting and governance functions.
Project manager	The project manager will oversee the planning, organisation and execution of the project, ensuring it is completed on time and to the required standard. They will also monitor progress, manage risks and have responsibility for project governance, such as reporting and project change requests. They will lead the communication with the SRO and industry and manage stakeholder expectations.
PRO	The PRO has responsibility to ensure the project meets policy and legislative requirements. The PRO is also responsible to ensure that the project deliverables can be implemented operationally. The PRO assists the SRO to provide resources, guidance and strategic direction aligned with organisational goals.
SRO/BO	Has overall responsibility for ensuring that the project meets its objectives and delivers the projected benefits. They have ultimate accountability and provide the resources, guidance and strategic direction aligned with organisational goals. The SRO will also work with the project manager to resolve conflict, mitigate risks and ensure smooth progress.
AIMS	To work collaboratively with the Project Manager to review the AGSA Scheme and co-design any new project artefacts while constructively engaging with the department and the broader shipping industry. Lead engagement with their industry members on any proposed changes to the AGSA Scheme, including supporting them to adopt any subsequent changes that may stem from the review of the AGSA Scheme.
Shipping industry stakeholders	To constructively engage with the department and the AIMS to improve the AGSA Scheme. Lead engagement with their industry members on proposed changes to the AGSA Scheme, including supporting them to adopt any subsequent changes that may stem from the review of the AGSA Scheme.

11. RISKS					
Risk ID	Risk description	Likelihood	Consequence	Treatment(s)	Residual Risk Rating
1	Scope creep based on evolving business needs	Possible	Moderate	Clearly defined and agreed scope approved by the SRO. Clear communications strategy with industry. Strong departmental	Medium

Project Plan

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

11. RISKS					
Risk ID	Risk description	Likelihood	Consequence	Treatment(s)	Residual Risk Rating
				leadership to resist scope change.	
2	Resourcing competing with other business priorities, other PERP projects and operational demands on subject matter experts and PERP team members.	Possible	Moderate	As above, the scope being agreed and approved will address this risk. Delays to project progress will be reported through regular monthly reports and scheduled project meetings. departmental staff are available for project, however availability of subject matter experts will be managed. Project manager and SRO will monitor and intervene where necessary.	Low
3	Insufficient governance due to competing priorities adversely impact strategic objectives and decision making.	Unlikely	Moderate	Project governance to be monitored by project manager and regular reporting to SRO.	Low
4	Broader shipping industry members resist the AGSA Scheme review recommendations and adoption of changed policies.	Almost certain	Moderate	SRO will lead stakeholder engagement through informal and formal opportunities including at ICCs. If necessary, a 'Have your say' or other alternative consultative process will be delivered during project delivery.	Medium

12. PROJECT ISSUES			
Issue ID	Issue Description	Planned Resolution	Planned Resolution Date
1	Shipping industry stakeholders have voiced disagreement with existing conflicts of interest	Existing conflicts of interest processes will be reviewed and recommendations made in response to stakeholder concerns and	Recommendations delivered by end December 2026.

Project Plan

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

12. PROJECT ISSUES			
Issue ID	Issue Description	Planned Resolution	Planned Resolution Date
	processes under the AGSA Scheme.	required processes to manage conflicts of interest.	

13. SCHEDULE - INDICATIVE TIMEFRAMES					
☐ 0-3 months	☐ 3-6 months	☐ 6-9 months	☒ 9-12 months	☐ 12-18 months	☐ 18+months
Comments Monthly project status reports will inform PRO and SRO of critical aspects of project health and performance. They will flag potential issues, concerns or changes required, including where project milestone delivery may be at risk. Change requests will be considered if timeframes in this schedule are to be varied.					
Milestone			Targeted date		
<u>Stage 1 – Review and recommendations</u>					
Governance requirements (SRO sign off)			End August 2025		
Review deed and agree with working group and AIMS required updates for AGS to progress			End August 2025		
August status report/review risks and issues			End August 2025		
Review existing (interim) conflicts of interest processes			End October 2025		
Review standard			End October 2025		
Draft review document – endorsement by both Parties			End October 2025		
October status report, review risks and log issues (no Sept report)			End October		
DAFF/AIMS industry consultation on review findings, proposed recommendations and action plan - completed			End November 2025		
November status report, review risks and log issues			End November 2025		
Deed updates finalised between DAFF and AIMS			End December 2025		

Project Plan

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

13. SCHEDULE - INDICATIVE TIMEFRAMES	
Recommendations agreed (conflicts of interest, standards, operational documents) and endorsed by both Parties/SRO	End December 2025
December status report, review risks and log issues	End December 2025
<u>Stage 2 – Implementation of recommendations</u>	
Develop sub project plan for implementation of agreed recommendations	Mid January 2026
Progress recommendations to conflicts of interest, standard and operational documents and finalise same	Mid March 2026
Draft business readiness assessment	End March 2026
Draft project closure report	End March 2026
Closure report finalised (SRO sign off)	End April 2026

14. ESTIMATED COSTS (SUMMARY OF COSTING TEMPLATE)			
Note: any operational expenditure must be funded within the Division's budget.			
Opex only - approximately \$80,000			
Project resources are funded by appropriation and cost recovery. Resources from the PERP are funded by appropriation while resources from GSEP are funded by cost recovery.			
<u>Summary of Required Skills/Resources</u>			
Combination of policy/program officers to lead the review and subject matter experts with knowledge of the bulk vessel exports and the shipping industry supply chain to inform project deliverables.			
Confidence rating	☐ Red – hard to say	☒ Amber – a rough estimate	☐ Green – confident
At this stage and for both stages of the project.			

Project Plan

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

15. MONITORING AND CONTROL			
Reporting Type	Audience	Responsibility	Frequency
Status reports	PRO and SRO	Working group	Monthly or as required
Verbal update	SRO/BO	Project manager	As required
Verbal update	Stakeholders (including the AIMS)/ICC	Project manager/SRO	As required

16. CHANGE CONTROL
This project is subject to a formal change request process using the agreed departmental project change request template. The change request will define and document changes to the project's scope, schedule or budget and must be approved by the SRO before amending agreed tolerances.

17. STAKEHOLDERS ENGAGEMENT PLAN					
Stakeholder	Influence	Information requirements	Method	Frequency	Responsibility
PRO	High	Medium	Regular meetings with project manager	Monthly and ad hoc as required	Ensuring program/ commodity policy and legislation alignment
SRO	High	Medium	Regular meetings with project manager	Monthly	Project manager
GSEP	High	Medium	Regular informal updates and email communication	Ad hoc communications	Project manager
AIMS	High	Medium	Regular meetings and communications	Monthly and ad hoc as required	Project manager
Marine surveyors	Medium	Medium	AIMS to lead, likely use of surveys, emails and website notifications	AIMs to determine	AIMS
Shipping industry stakeholders	Medium	Medium	Informal communications, formal meetings including ICC	Ad hoc as required and at scheduled GPPEICC meetings	Project manager

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

18. CONSTRAINTS

1. Resourcing within the department may limit the delivery of the project due to unforeseen factors and or competing priorities.
2. The availability of subject matter experts may delay milestone delivery.
3. Broader shipping industry issues may impact the project delivery.

19. ASSUMPTIONS

1. Availability of PERP and subject matter experts to progress project deliverables and provide timely support and expertise.
2. Funding for resources continues for the duration of the project.
3. That stakeholders will see the benefits stemming from the recommendations of the reviews and advocate positively with their members of the improvements to the AGSA Scheme.

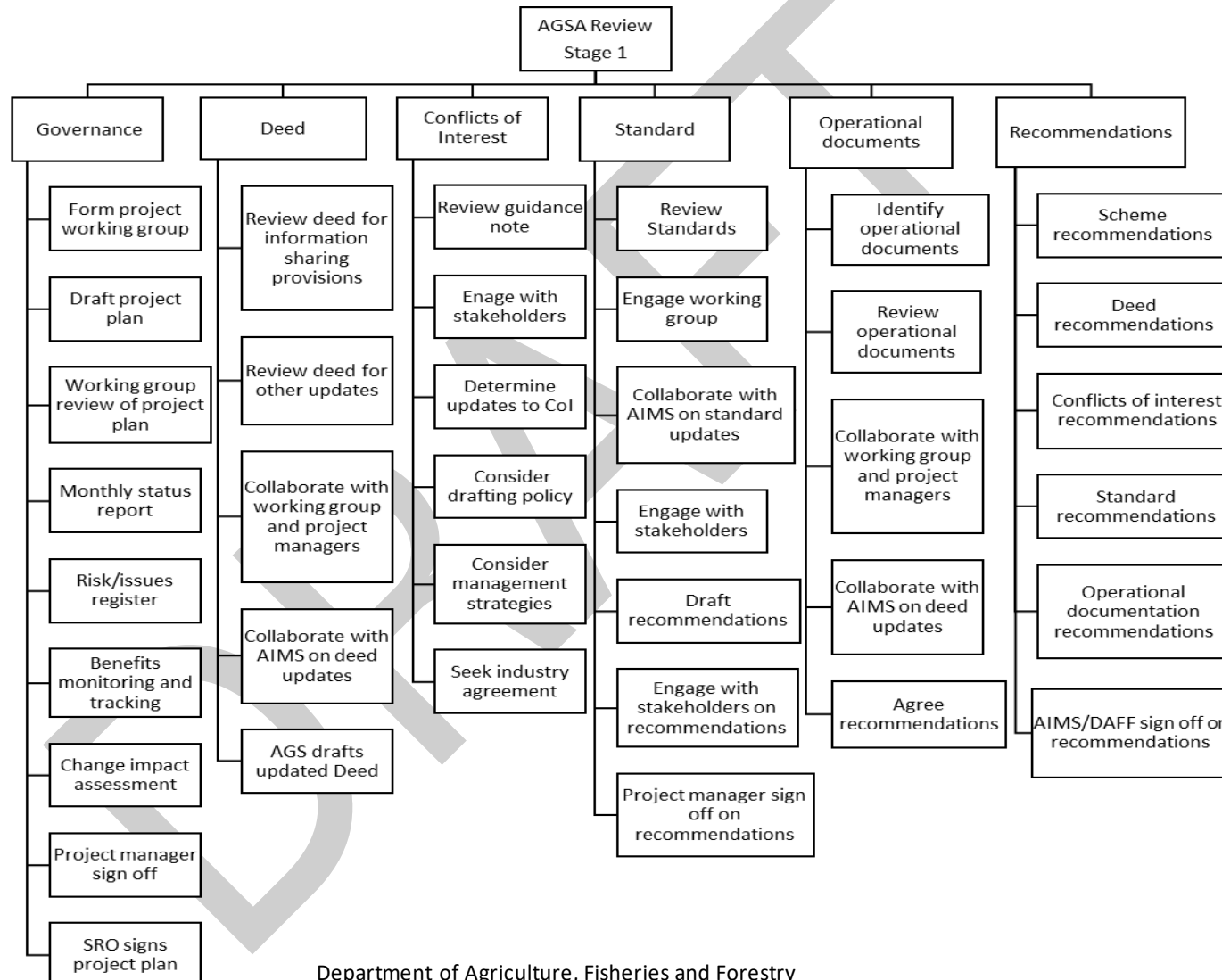
20. DEPENDENCIES

1. Implementation of the review findings cannot occur until consultation is undertaken with the broader shipping industry

Project Plan

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

Appendix A



Department of Agriculture, Fisheries and Forestry

Project Plan

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

Appendix B: Definitions

Term	Definition
Assumptions	Factors that are believed to be true based on information available at the time and experience. It is possible they will prove not to be true as the project progresses through the lifecycle and as such, they can help in developing the risk register.
Benefit	A measurable change resulting from an outcome which is perceived as an advantage by one or more stakeholders in financial (savings/profit) or non-financial terms. Delivering benefits is the primary reason why the department undertakes change and invests in projects.
Benefits management	The process of identifying, defining, planning, tracking, and realising the benefits to deliver value and meet the department's strategic purpose, objectives, and priorities.
Constraints	Limitations or restrictions identified when drafting the concept such as time, budget, or resources. Constraints are known to be true.
Control	A measure in place that maintains and/or modifies risk. Controls include, but are not limited to, any process, policy, device, practice, or other conditions and/or actions which maintain and/or modify risk.
Current Risk Rating	The current level of assessed risk determined by considering the consequence and likelihood and considering the effectiveness of existing controls. The Current Risk Rating is the risk that remains after you have implemented a control/treatment and should also be measured against the department's Risk Appetite and Tolerance Statements to determine if it is acceptable, or if further treatment is required.
Objectives	Project objectives describe the project's aim and set the goalposts for success. Project objectives are measurable and achievable; they push the team to stay on track. A project can have multiple objectives that the project can achieve at different points throughout the project lifecycle.
Operating expenditure (OPEX)	A category of expenditure that a business incurs through performing its normal business operations. Also, includes most activities undertaken as part of the plan, implementation, and close phases of a project.
Outputs	Items that the project must create as part of the requirements. Another name for outputs is 'products'.
Program/commodity Responsible Officer (PRO)	The PRO has responsibility to ensure the project meets policy and legislative requirements. The PRO is also responsible to ensure that the project deliverables can be implemented operationally. The PRO assists the SRO to provide resources, guidance and strategic direction aligned with organisational goals.

Project	A temporary entity that is created for the purpose of delivering one or more unique business outputs or specialist products. In general, a project is any package of work that: ▪ has a start and end date with a specified objective and scope of work ▪ involves the complete or partial delivery of a budget measure, government initiative or internally funded business case
Project assurance	The systematic set of actions necessary to provide confidence to senior leaders and stakeholders that project work is managed and controlled on track to deliver and aligned with policy or the department's strategy.
Project management	The management of a temporary activity to produce specific change for the department.
Resources	Anything that is necessary for the project to be successfully delivered. They may be people (internal or external - FTE), capital (CAPEX or OPEX funding) or material goods (hardware, software, equipment, machinery, property).
Risk	The effect of uncertainty on objectives. An effect can be positive, negative or both, and can address, create, or result in opportunities or threats.
Risk management	Coordinated activities to direct and control an organisation with regard to risk.
Scope	The project scope is an agreed summary of all the important parameters of the entire project. A well-written project scope includes things like goals, deliverables, tasks, costs, and deadlines.
Senior Responsible Officer (SRO)	The SRO has overall responsibility for ensuring that a program or project meets its objectives and delivers the projected benefits. They have ultimate accountability for the program or project delivering its objectives and realising benefits.
Target Risk Rating	The level of risk that a current risk rating must be reduced to through treatments prior to accepting that risk. The Target Risk Rating should consider the department's Risk Appetite and Tolerance Statements.
Treatments	An action to reduce the consequence and/or likelihood of a risk occurring. When an existing control does not effectively manage a risk within an acceptable tolerance, a treatment is necessary. A treatment modifies an existing control or becomes a new control when implemented, reducing the Current Risk Rating.

Appendix C: Project Tiering

Note: Projects do not need to meet all criteria to be classified in a particular tier. Sound judgement should be used to determine the most appropriate tier for a project.		Tier 1 (Substantial)	Tier 2 (Significant)	Tier 3 (Standard)
Elements	Type	Program or project	Program or project	Project
	Attributes	High complexity – major political profile, breaking new ground, many elements to deliver, high level of dependence on other projects/activities and tight deadlines	Medium complexity – minor to moderate political profile, some experience with this type of project, several elements to deliver, some dependence on other projects/activities and constrained deadlines	Low complexity – no political profile, delivering only one or two elements, no dependencies, and flexible deadlines
	DCB funded (These are notional thresholds)	High or severe level of risk	Medium level of risk	Low level of risk
		High ministerial or political sensitivity	Medium ministerial or political sensitivity	Low ministerial or political sensitivity
		High industry impacts	Medium industry impacts	Low industry impacts
		Above \$5m for the life of the project (entire project)	\$1 to \$5m	Less than \$1m
Requirements	Governance	Must report to a project board or a shared program board Oversight provided by the Investment Committee	Must report to a project board or a shared program board	Managed by an SRO (minimum EL2 Level)
	Management	Must provide monthly status reports to the board and the relevant PMO	Must provide monthly status reports to the board and the SRO	May be requested to supply regular status reports to the SRO
		Program or Project Manager with appropriate qualifications and extensive experience	Program or Project Manager with appropriate qualifications and relevant experience	Project Manager with appropriate level of experience



Project Change Request

1. PROJECT INFORMATION			
Project Name	Plant Exports Branch – Accredited Grain Surveyor Assurance Scheme – Tier 3		
Senior Responsible Officer (SRO) and Business Owner (BO)	s. 22(1)(a)(ii), a/g Director, Plant Export Reform Program (PERP)	Division	Plant and Live Animal Exports, Welfare and Regulation Division
Program/commodity responsible officer (PRO)	s. 22(1)(a)(ii), Director, Grain and Seed Export Program	Branch	Plant Exports Branch

2. PROJECT CHANGE REQUEST			
Description	Request to extend agreed delivery schedule		
Change type	Scope ☐	Budget ☐	Schedule ☒
Raised by	Project manager - s. 22(1)(a)(ii), PERP		
Proposed change	This change request is seeking to extend the original project schedule to manage the emerging risk from project resources being allocated to other business priorities and PERP projects. Consequently the original project schedule due dates are unlikely to be realised. Attachment 1, draft amended AGSA Project Plan, details the recommended tracked changes to the schedule, along with minor editorial changes. Attachment 2 is the final AGSA Project Plan with tracked changes accepted.		
	<u>Project assumptions</u> Project planning considered three assumptions, one of which related to the availability of PERP and subject matter experts to progress project deliverables and provide timely support and expertise. In summary this assumptions assumed that capable resources would be available, roles and responsibilities would be upheld and that funding for resources would be made available. These assumptions, for planning purposes, came true and the project initiated with adequate resources aligned to the agreed project schedule.		
	<u>Project risks</u> Four project risks were identified during project planning. These risks are registered on the PERP risk register and documented in the project plan. One identified risk is at risk of becoming an issue. This risk is #49 from the PERP register which correlates with risk #2 in the project plan, extract follows:		

Project Change Request

Accredited Grain Surveyor Assurance Scheme Review

2. PROJECT CHANGE REQUEST

	Project plan risk #	Risk description	Control and treatment
	2	Resourcing competing with other business priorities, other PERP projects and operational demands on subject matter experts and PERP team members.	The scope being agreed and approved will address this risk. Delays to project progress will be reported through regular monthly reports and scheduled project meetings. Departmental staff are available for project, however availability of subject matter experts will be managed. Project manager and SRO will monitor and intervene where necessary.
The agreed control and treatment was implemented to manage this risk and whilst this treatment was adopted, this risk is likely to become an issue. This is because staff are increasingly being diverted to competing core business priorities, including increasing requests for legal advice, progressing complex legislative amendments and agreements, prioritising administrative sanctions of regulated entities and progressing deliverables associated with the sanctions project.			
<u>Proposed changes</u> Attachment 1 details proposed changes to the project schedule that, in summary, extends the majority of the project delivery due dates. Noting that the project was divided into two stages, these proposed amendments, at the higher level, mean: - stage one, review is now proposed for completion end February 2026 instead of end December 2025 - stage 2, implementation, is now proposed for completion end June 2026 instead of end April 2026. These changes are necessary to manage the workload associated with competing core business priorities of the legislation team, noting that the team will still progress project deliverable at every opportunity as competing priorities permit. It will also enable new resources within the team to build their subject matter knowledge of the project to enable succession arrangements to complete stage 2 of the project.			

Project Change Request

Accredited Grain Surveyor Assurance Scheme Review

3. RISKS IF CHANGE NOT IMPLEMENTED	
The following risks have been identified if the new schedule due dates are not implemented. Apart from the first risk in the table below, these are new risks that have been identified should the agreed schedule due dates at project initiation be maintained.	
Risk description	Consequence
Resourcing competing with other business priorities, other PERP projects and operational demands on subject matter experts and PERP team members.	Project timelines may not be met due to resources being diverted to competing priorities.
Reduced quality of materials	The potential exists that the quality of the final deliverables may be compromised due to: • the project team rushing the drafting of materials, • insufficient research to inform quality content, and • reduced collaboration opportunities. These may lead to a reduction in the quality of materials being produced.
Reduced staff morale	Constant pressure, and the disappointment of missed deadlines, may lead to demotivation and burnout.

Approvals

Senior Responsible Officer (SRO) and Business Owner (BO)	s. 22(1)(a)(ii), a/g Director, PERP
Decision	Approved / Please discuss/Please discuss Comment: Please monitor further slippage to milestones and keep me informed. s. 47F(1)
SRO/BO signature	
Decision date	23 October 2025



Australian Government
**Department of Agriculture,
Fisheries and Forestry**

Plant Exports Branch
Accredited Grain Surveyor
Assurance Scheme Review

Approvals

Project manager	s. 22(1)(a)(ii), Assistant Director, Plant Export Reform Program (PERP)
Project manager signatures and date	s. 47F(1) 07 / 08 / 2025
Program/commodity responsible officer (PRO)	s. 22(1)(a)(ii), Director, Grain and Seed Export Program (GSEP)
PRO signature and date	s. 47F(1) 08/08 /2025
Senior Responsible Officer (SRO) and Business Owner (BO)	s. 22(1)(a)(ii) , a/g Director, Plant Export Reform Program (PERP)
SRO / BO signature and date	s. 47F(1) 23 / 10 / 2025

Version history

Version	Date	Reviewed by (Name, position)	Role	Comment (Amendment type)
1.0	8 August 2025	s. 22(1)(a)(ii) , Director PERP	SRO/BO	Final plan endorsed
2.0	23 October 2025	s. 22(1)(a)(ii) , a/g Director PERP	SRO/BO	Updates to align with approved change request

1. OWNERSHIP			
Project Name and Tier	Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review, Tier 3.		
Project Ref. Number	n/a	Group	Agricultural Trade Group
Senior Responsible Officer (SRO) and Business Owner (BO)	s. 22(1)(a)(ii)	Branch	Plant Exports Branch
Project Manager	s. 22(1)(a)(ii)	Branch	Plant Exports Branch

☐ New Project/Initiative ☒ Existing Project/Initiative

2. OVERVIEW/BUSINESS BACKGROUND

The *Accredited Grain Surveyor Assurance Scheme (AGSA Scheme)* was implemented in July 2023. The AGSA Scheme:

- clarifies marine surveyor qualification requirements, including incorporation of additional work experience requirements,
- requires all qualified marine surveyors who survey and certify bulk vessels as suitable to transport prescribed plants or plant products, to be accredited under the AGSA Scheme, and
- provides that the Australasian Institute of Marine Surveyors (**AIMS**) administer the AGSA Scheme on behalf of the Department of Agriculture, Fisheries and Forestry (**the department**).

The purpose of the AGSA Scheme is for AIMS to determine the accreditation of marine surveyors to carry out a survey of a bulk vessel for the purpose of deciding whether the vessel is suitable to transport prescribed plants or plant products. The objective of the AGSA Scheme is to provide increased assurance to the department and the broader shipping industry, that marine surveyors performing bulk vessel surveys are qualified and performing activities in accordance with legislative provisions in the Plant Rules, and other relevant Standards and Policies for accreditation in force from time to time.

The AGSA Scheme was enabled, and operates through, the following:

- the adoption of legislative amendments in the Export Control (Plant and Plant Products) Rules 2021 (**Plant Rules**). These amendments require marine surveyors to be accredited by the AIMS in order to carry out bulk vessel surveys for the purposes of the Plant Rules.
- the *Deed for the Accredited Grain Surveyor Assurance Scheme (the Deed)* between the AIMS and the department (**the parties**). The Deed includes two Policies that describes how AIMS will accredit marine surveyors, manage complaints and conduct investigations of said complaints.
- the *Standard for Empty Bulk Vessel Surveys by Accredited Marine Surveyors (the Standard)* was jointly developed by the department and AIMS in 2023. The Standard aims to ensure that the condition of the bulk vessel supports phytosanitary certification by improving marine surveyor bulk vessel survey practices.
- various operational Scheme materials, for example a *Conflicts of Interest Guidance Note*, the *AGSA complaint process fact sheet* and the *Grievance and Complaint Form*.

The AGSA Scheme has been operational for 2 years and as such it is timely to review past performance of the Scheme to determine the Scheme's future performance. In addition to periodic reviews being good practice, the Deed also includes clauses relating to reviews of the Scheme and Deed:

- an informal review 12 months post implementation,
- a formal review on or around the third anniversary of the commencement date, and
- every 3 years after that date.

Whilst an informal review did not occur 12 months post implementation, both parties have continued working together to review and improve the Scheme as a matter of good practice. Furthermore, both parties have received industry feedback in relation to areas where performance of the Scheme could be improved.

In acknowledgement of this, both parties have agreed it is timely to conduct a formal review of the AGSA Scheme encompassing the Deed, Standard (limited in scope), Conflicts of Interest processes and the operational Scheme materials. DAFF and AIMS will also seek opportunities for stakeholder engagement in this review to influence the development of enhancements and strengthen the performance of the Scheme. This review will provide DAFF an opportunity to update the AGSA Scheme to reflect changes to the *Export Control Act 2020 (the Act)* in relation to information sharing provisions, a key enabler supporting the AIMS to determine the accreditation of marine surveyors to carry out a survey of a bulk vessel for the purpose of deciding whether the vessel is suitable to transport prescribed plants or plant products.

3. PROJECT OBJECTIVES

1. To support both parties to collaborate and conduct a formal review of the AGSA Scheme to determine the Scheme performance to date.
2. To engage with relevant stakeholders to determine, from their perspective, the Scheme performance to date and provide opportunities for these stakeholders to provide feedback and influence improvements to the Scheme.
3. To support both parties to determine recommendations for improvements to the Scheme and implementation of recommendations.

4. SCOPE	
<u>Stage 1 – Review and recommendation</u>	
1. To conduct a formal review of the existing products listed in Appendix A (minus the governance artefacts) noting that the review of the Standard is limited to updates that arise from the review of conflicts of interest processes. The review will consider past performance of the Scheme, and stakeholder feedback, to make recommendations that determine the Scheme's future performance against the intended objectives when implemented in 2023. This will result in the drafting of a document that consolidates the findings of the reviewed products that will be endorsed by both parties and encompasses stakeholder feedback. 2. To develop a clear recommendation, or suite of recommendations, that respond to the review findings, including any stakeholder feedback obtained, that aims to strengthen the performance of the AGSA Scheme.	
<u>Stage 2 – Implementation of recommendations</u>	
3. To develop an implementation plan and accompanying product breakdown that determines the approach to implementing the recommendations of the review findings. 4. To implement the recommendations of the review as developed during stage 1.	
5. OUT OF SCOPE	
1. All work associated with bulk vessel inspection issues outside the scope of the AGSA Scheme.	
6. OUTPUTS/PRODUCTS – REFER APPENDIX A	
Output	Purpose
1. Governance	Draft, and seek sign off, of project governance documentation for stage 1. Includes formation of working group and drafting of project artefacts.
2. Deed	Review the deed to ensure that information sharing provisions within the Act are enacted in the deed. Consider AIMS and stakeholder feedback for other updates to the deed.
3. Review conflicts of interest processes	Respond to industry feedback and collaborate with AIMS on requirements to make recommendations for change to existing conflicts of interest processes, including management planning.
4. Review standard	Review the Standard in the context of conflicts of interest processes and, where required, make recommendations for implementation in stage 2.
5. Review operational documents	In acknowledgement of agreed recommendations in relation to the deed, conflicts of interest and standard, review the operational documentation in alignment with recommendations and propose updates for stage 2.
6. Recommendations	Stage 1 will form the final set of recommendations from the review of the existing conflicts of interest processes, standard and operational documents to be implemented in stage 2.
7. Implementation of recommendations (stage 2)	Not in documented in stage 1 planning. Stage 2 will be informed by the review recommendations in stage 1. Consequently the development of

6. OUTPUTS/PRODUCTS – REFER APPENDIX A	
Output	Purpose
	further outputs such as updates to Scheme materials, including planning artefacts, cannot be determined until stage 1 concludes.

7. BENEFITS			
Expected benefits	Measure	Owner	Timeframe for delivery
1. Sharing of information between AIMS and DAFF ensures AIMS is informed about marine surveyor performance. This is critical when determining a marine surveyor's accreditation to carry out a survey of a bulk vessel for the purpose of deciding whether the vessel is suitable to transport prescribed plants or plant products.	Information is shared between DAFF and AIMS for the purposes of determining accreditation of marine surveyors.	Jemma Martin	End 2026/27 financial year
2. Stakeholder support for the AGSA Scheme is strengthened.	Stakeholders comments support the AGSA Scheme.		
3. Conflicts of interests declared and managed while supporting stakeholder requirements across the shipping industry.	Conflicts of interests are declared to the AIMS by marine surveyors.		

8. RESOURCES				
Role	Estimated efforts (%)			Nominated resource
	Planning	Delivery	Closure	
Project working group	75	70	70	EL1 PERP
	5	5	5	APS6 PERP
	5	10	15	Subject matter experts GSEP
PRO	5	5	5	s. 22(1)(a)(ii) (GSEP)
SRO/BO	10	10	5	Director, PERP (EL2)
TOTAL	100	100	100	

9. GOVERNANCE		
Project working group	Monthly status report to be developed and available for PRO and SRO to use as required.	Project manager

9. GOVERNANCE		
Grain and Plant Products Export Industry Consultative Committee (GPPEICC)	Under the leadership of the Chair, SRO and PRO will lead engagement to seek stakeholder feedback and influence stakeholder expectations as it relates to the AGSA Scheme review and recommendations.	Jemma Martin

10. ROLES AND RESPONSIBILITIES	
Role	Responsibility
Project working group	The project working group is responsible for the drafting and delivery of specific project activities and tasks, including those related to planning, development, implementation, risk management, reporting and governance functions.
Project manager	The project manager will oversee the planning, organisation and execution of the project, ensuring it is completed on time and to the required standard. They will also monitor progress, manage risks and have responsibility for project governance, such as reporting and project change requests. They will lead the communication with the SRO and industry and manage stakeholder expectations.
PRO	The PRO has responsibility to ensure the project meets policy and legislative requirements. The PRO is also responsible to ensure that the project deliverables can be implemented operationally. The PRO assists the SRO to provide resources, guidance and strategic direction aligned with organisational goals.
SRO/BO	Has overall responsibility for ensuring that the project meets its objectives and delivers the projected benefits. They have ultimate accountability and provide the resources, guidance and strategic direction aligned with organisational goals. The SRO will also work with the project manager to resolve conflict, mitigate risks and ensure smooth progress.
AIMS	To work collaboratively with the Project Manager to review the AGSA Scheme and co-design any new project artefacts while constructively engaging with the department and the broader shipping industry. Lead engagement with their industry members on any proposed changes to the AGSA Scheme, including supporting them to adopt any subsequent changes that may stem from the review of the AGSA Scheme.
Shipping industry stakeholders	To constructively engage with the department and the AIMS to improve the AGSA Scheme. Lead engagement with their industry members on proposed changes to the AGSA Scheme, including supporting them to adopt any subsequent changes that may stem from the review of the AGSA Scheme.

11. RISKS					
Risk ID	Risk description	Likelihood	Consequence	Treatment(s)	Residual Risk Rating
1	Scope creep based on evolving business needs	Possible	Moderate	Clearly defined and agreed scope approved by the SRO. Clear communications strategy with industry. Strong departmental leadership to resist scope change.	Medium
2	Resourcing competing with other business priorities, other PERP projects and operational demands on subject matter experts and PERP team members.	Possible	Moderate	As above, the scope being agreed and approved will address this risk. Delays to project progress will be reported through regular monthly reports and scheduled project meetings. Departmental staff are available for project, however availability of subject matter experts will be managed. Project manager and SRO will monitor and intervene where necessary.	Low
3	Insufficient governance due to competing priorities adversely impact strategic objectives and decision making.	Unlikely	Moderate	Project governance to be monitored by project manager and regular reporting to SRO.	Low
4	Broader shipping industry members resist the AGSA Scheme review recommendations and adoption of changed policies.	Almost certain	Moderate	SRO will lead stakeholder engagement through informal and formal opportunities including at ICCs. If necessary, a 'Have your say' or other alternative consultative process will be delivered during project delivery.	Medium

12. PROJECT ISSUES			
Issue ID	Issue Description	Planned Resolution	Planned Resolution Date
1	Shipping industry stakeholders have voiced disagreement with existing conflicts of interest	Existing conflicts of interest processes will be reviewed and recommendations made in response to stakeholder concerns and	Recommendations delivered by end December 2026.

12. PROJECT ISSUES			
Issue ID	Issue Description	Planned Resolution	Planned Resolution Date
	processes under the AGSA Scheme.	required processes to manage conflicts of interest.	

13. SCHEDULE - INDICATIVE TIMEFRAMES					
☐ 0-3 months	☐ 3-6 months	☐ 6-9 months	☒ 9-12 months	☐ 12-18 months	☐ 18+months
Comments Monthly project status reports will inform PRO and SRO of critical aspects of project health and performance. They will flag potential issues, concerns or changes required, including where project milestone delivery may be at risk. Change requests will be considered if timeframes in this schedule are to be varied.					
Milestone			Targeted date		
<u>Stage 1 – Review and recommendations</u>					
Governance requirements (SRO sign off)			End August 2025		
Continue reviewing the deed in liaison with AIMS			End August 2025		
August status report/review risks and issues			End August 2025		
Informal industry engagement			End August 2025		
October status report, review risks and log issues			End October 2025		
Formal DAFF/AIMS industry engagement via ‘Have your say’ on AGSA scheme review			End November 2025		
November status report, review risks and log issues			End November 2025		
Commence drafting review document			End November 2025		
December status report, review risks and log issues			End December 2025		
Review conflicts of interest materials and industry Standard			End December 2025		
Finalise review document, including obtaining endorsement by both Parties			End January 2026		
Deed updates agreed between DAFF and AIMS			End January 2026		
January status report, review risks and log issues			End January 2026		

13. SCHEDULE - INDICATIVE TIMEFRAMES	
Recommendations agreed (conflicts of interest, standards, operational documents) and endorsed by both Parties/SRO	End February 2026
February status report, review risks and log issues	End February 2026
<u>Stage 2 – Implementation of recommendations</u>	
Finalise sub project plan for implementation of agreed recommendations	Mid March 2026
March status report	End March 2026
Continue with AIMS and AGS engagement to progress updates to the Deed	Mid March 2026
Draft, in liaison with stakeholders, required updates to conflicts of interest, standard and operational documents	End April 2026
April status report	End April 2026
Draft business readiness assessment and project closure report	Mid May 2026
Progress/finalise updates to the Deed with AIMS and AGS	Mid May 2026
Finalise, in liaison with stakeholders, required updates to conflicts of interest, standard and operational documents	Mid May 2026
May status report	End May 2026
Finalise business readiness assessment and transfer AGSA Scheme back to GSEP	Mid June 2026
June status report	End June 2026
Closure report finalised (SRO sign off)	End June 2026

14. ESTIMATED COSTS (SUMMARY OF COSTING TEMPLATE)

Note: any operational expenditure must be funded within the Division's budget.

Opex only - approximately \$80,000

Project resources are funded by appropriation and cost recovery. Resources from the PERP are funded by appropriation while resources from GSEP are funded by cost recovery.

Summary of Required Skills/Resources

Combination of policy/program officers to lead the review and subject matter experts with knowledge of the bulk vessel exports and the shipping industry supply chain to inform project deliverables.

Confidence rating	☐ Red – hard to say	☒ Amber – a rough estimate	☐ Green – confident
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At this stage and for both stages of the project.

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Reporting Type	Audience	Responsibility	Frequency
Status reports	PRO and SRO	Working group	Monthly or as required
Verbal update	SRO/BO	Project manager	As required
Verbal update	Stakeholders (including the AIMS)/ICC	Project manager/SRO	As required

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This project is subject to a formal change request process using the agreed departmental project change request template. The change request will define and document changes to the project's scope, schedule or budget and must be approved by the SRO/BO before amending agreed tolerances.

17. STAKEHOLDERS ENGAGEMENT PLAN

Stakeholder	Influence	Information requirements	Method	Frequency	Responsibility
PRO	High	Medium	Regular meetings with project manager	Monthly and ad hoc as required	Ensuring program/ commodity policy and legislation alignment
SRO/BO	High	Medium	Regular meetings with project manager	Monthly	Project manager
GSEP	High	Medium	Regular informal updates and email communication	Ad hoc communications	Project manager

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Stakeholder	Influence	Information requirements	Method	Frequency	Responsibility
AIMS	High	Medium	Regular meetings and communications	Monthly and ad hoc as required	Project manager
Marine surveyors	Medium	Medium	AIMS to lead, likely use of surveys, emails and website notifications	AIMs to determine	AIMS
Shipping industry stakeholders	Medium	Medium	Informal communications, formal meetings including ICC	Ad hoc as required and at scheduled GPPEICC meetings	Project manager

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1. Resourcing within the department may limit the delivery of the project due to unforeseen factors and or competing priorities. 2. The availability of subject matter experts may delay milestone delivery. 3. Broader shipping industry issues may impact the project delivery.

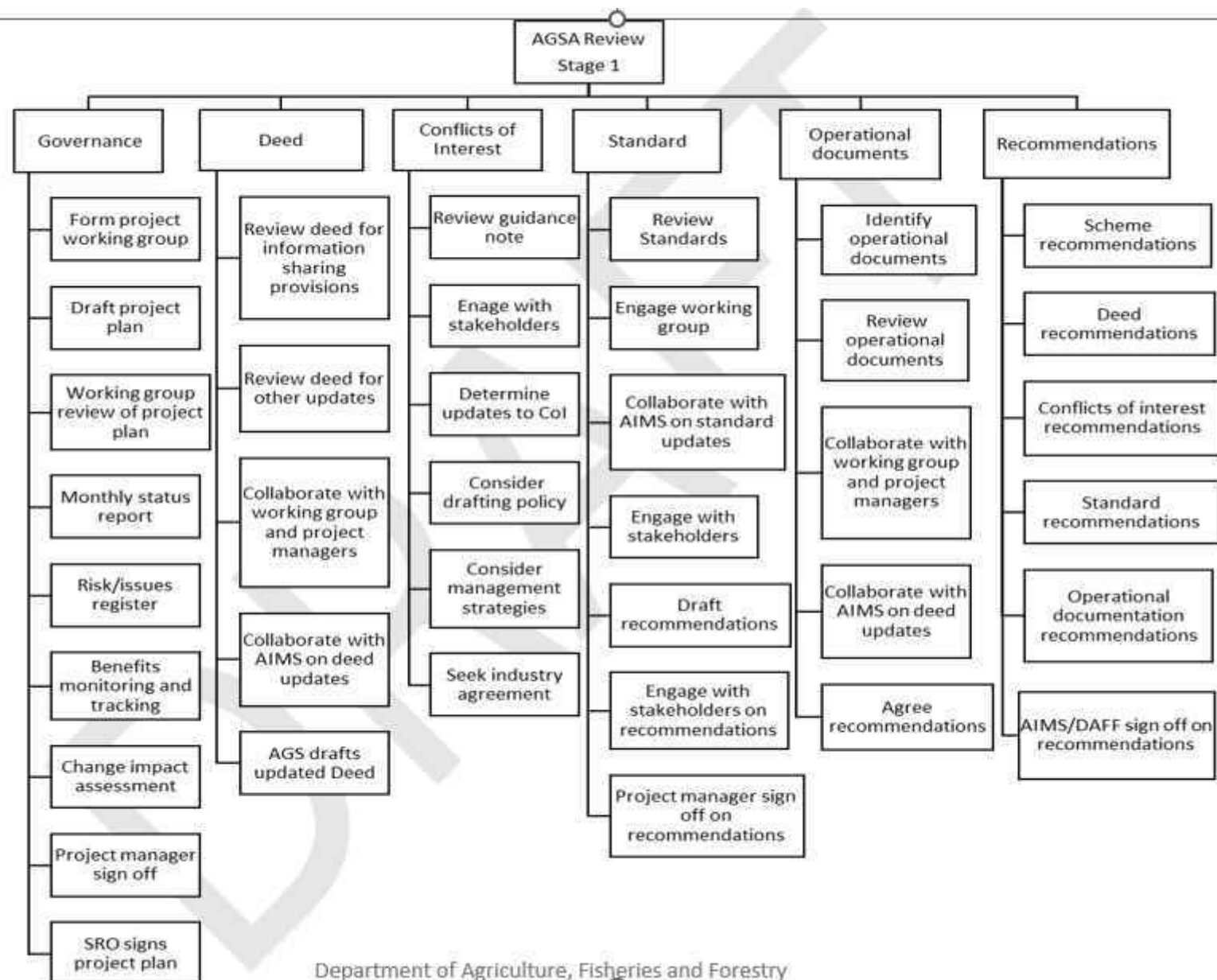
19. ASSUMPTIONS
1. Availability of PERP and subject matter experts to progress project deliverables and provide timely support and expertise. 2. Funding for resources continues for the duration of the project. 3. That stakeholders will see the benefits stemming from the recommendations of the reviews and advocate positively with their members the improvements to the AGSA Scheme.

20. DEPENDENCIES
1. Implementation of the review findings cannot occur until consultation is undertaken with the broader shipping industry

Project Plan

Plant Exports Branch - Accredited Grain Surveyor Assurance Scheme Review

ATTACHMENT 1



Response Unique ID		Submi	Privat	Anonym	Outco	Confirm that you have read and understand this declaration	First name	Last name	Email	Which of the following best describes your situation? - Member of the public	Which of the following best describes your situation? - Marine Surveyor or Accredited Marine Surveyor	Which of the following best describes your situation? - Industry representative	Which of the following best describes your situation? - Vessel owner	Which of the following best describes your situation? - State or territory government	Which of the following best describes your situation? - Authorised Officer or Bulk Vessel Authorised Officer	Which of the following best describes your situation? - Other	Are you an accredited marine surveyor?	Do you rely on the services of an accredited marine surveyor?	How do you engage their services? - Directly contracted/ subcontracted	How do you engage their services? - Outsourced (e.g. by a third-party contractor/s subcontractor)	How do you engage their services? - Other
sbm3c9af7d15b3f01179804e	15	#####			complete	Yes											no	yes			
sbm3c65a85a7e2b2403c1d9f	14	#####			complete	Yes											yes				
sbm3c5440314e3d7c03e7ceb	13	#####			complete	Yes											yes				

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

sbm3c24
8421c9fa
87b67989
a 12 ##### complete Yes

s. 22(1)(a)(ii)

no yes

Directly
contracted/
subcontract
ed

sbm3c22
3f201056
f171c1c0
b 11 ##### complete Yes

yes

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

sbm3bfbf c85ba548 5003f50b	10 #####	comple te	Yes	yes
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sbm3bf8c 0c85a2c5 8fab1e5d	9 #####	comple te	Yes	yes
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sbm3bf7a 7d7fa839 5c78c670	8 #####	comple te	Yes	yes
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sbm3bf69 0da18d9b 42685ae7	7 #####	comple te	Yes	yes
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s. 22(1)(a)(ii)

sbm3bf37 a84b4ccd 813aace8	6 #####	comple te	Yes	yes
----------------------------------	---------	--------------	-----	-----

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

sbm3bf2b
2f84fcca7
634dc65

5 #####

comple
te

Yes

yes

sbm3bf27
36a0c349
fa1fd8df

4 #####

comple
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Yes

yes

sbm3bd8
849b9477
594aec5f
9

3 #####

comple
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Yes

yes

sbm3bd4
20dbe26f
1ddf72a6
d

2 #####

comple
te

Yes

sbm3bd2
5466e695
84ed9db5
1

1 #####

comple
te

Yes

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

yes

no

no

Is information on the AGSA scheme readily available?	Please rate how informed you feel about the AGSA Scheme	Do you know who to contact for support when performing your accredited marine surveyor duties?	Do you know who to contact for support when you need assistance with the duties being performed by an accredited marine surveyor?	Have you contacted somebody for support in the past?	Please share the details of your experience including who you contacted, for what purpose, and if your support needs were met.	If you contacted AIMS for support, how would you rate the helpfulness and expertise of the AIMS staff?	If you contacted DAFF for support, how would you rate the helpfulness and expertise of the DAFF staff?	Have you read the Standard?	Please provide your comments on the Standard	Please rate how aware you are of what is required of an accredited marine surveyor when they apply for accreditation	Do you follow the inspection procedures described within the Standard?	Please tell us why	In the context of the AGSA Scheme, do you know what a conflict of interest is?	Please tell us your understanding of what a conflict of interest is and how a marine surveyor must manage it	Do you agree with how accredited marine surveyor conflicts of interest are defined and managed?	Please tell us why	If you have a conflict of interest, have you reported it?	Please share your reason for not reporting your conflict of interest - Fear of retaliation
Yes	3	yes	yes		Industry had no involvement in the early stage of this process	Neutral	Neutral	yes	It is not descriptive enough and needs further work.. All standards require good audit and governance - unsure if this exists	3			yes	NA	no	See written submission		
Yes	5 yes			no				yes	Standard need to be updated.	yes			yes	Surveyor should not have any other interest on the vessel other than being a hold inspector.	yes		N/A â€œ I do not have a conflict of interest	
Yes	4 yes			no				yes	Accredited Surveyors should be from seafaring background	yes			yes	The AOs and marine surveyors must not be from the same company.	yes		N/A â€œ I do not have a conflict of interest	

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

Yes	4	yes	yes	Very unhelpful	Very helpful	yes	5	yes	no
				Neither the Department nor the AIMS has any interests to uphold the standard of the surveys/inspection and to avoid any conflict of interests. Shipping Agencies, Stevedores heavily involved in AAO Inspections and Marine surveys where they use their heavy weights to influence the shippers charterers to get appointment for AAO/MS and at the same involved for hold cleaning where they have obligations to pass or fail the holds as per their needs.		Department introduced working procedures which were never practiced by the department's own inspectors, it's impractical and unprofessional, for example vessel can't pass if the main decks are wet or inspection can't be carried out if there is water on deck.		Conflicts of interest dictated in the scheme is incomplete and it's not practiced in reality. Under one umbrella AAO/FTL done by same parent company in different names. no actions taken. Company involved in stevedoring/agencies/hold cleaning performing AAO/FTL surveys on the same vessels.	No restrictions for agencies business running AAO/FTL surveys in different names. it's huge conflict of interest.
Yes	3	yes	yes	Unhelpful	Unhelpful	yes	yes	yes	no

s. 22(1)(a)(ii)

Yes	4	yes	no			yes	It is well detailed but could work more on conflicts.	yes	yes	It is very clear that the marine surveyor should be independent to perform his duties as a marine surveyor and he should be from a different company.	no		N/A – I do not have a conflict of interest
Yes	5	yes	no			yes	Normal	yes	yes	A conflict of interest under the AGSA scheme is a situation in which the duty of an accredited surveyor, either working independently or within a company, conflicts with a duty owed to another party.	yes	To keep the survey standards	Yes
Yes	3	yes	no			yes	Loopholes in conflict of interest Very specific, all areas have been defined and explained as to what is acceptable and not acceptable.	yes	yes	Other Reason	no	Cleaning	N/A – I do not have a conflict of interest
Yes	5	yes	yes	The support was prompt and issue was resolved on time	Very helpful	Very helpful	yes	yes	yes	Ao and FTL surveyors must be from different companies	yes	BY the idendity on AIMS website, very easy to find out details of Marine surveyor.	N/A – I do not have a conflict of interest
Yes	3	yes	no			yes	18	yes	yes			Same company providing agency services same time providing AAO and/or FTL Surveys, also another member from same company or affiliated company engaged in cleaning of the holds, which force them to pass the down grade holds due to pressure by default.	N/A – I do not have a conflict of interest

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

Yes	4	yes	yes	Very helpful	Very helpful	yes		yes	yes	Conflict of Interest is to perform survey independently without any pressure by the all involved parties, FTL marine surveyor should not have any link with the AO's and should be working with a different organization or independently.	no	As said previously, both AO and FTL appointments should not come directly by the charterers because in the most of cases, they also acts as the disponent owner of the ship as per the charter party agreement until cargo won't discharge at the destination.	
Yes	5	yes	yes	Very helpful	Very helpful	yes	Standard is clear and easy to understanding	yes	yes	Personal or financial intrests should not interfere with your proffesional judgement	yes	It gives clear guidelines on how to manage such situations and where and whom to consulta if in doubt	N/A " I do not have a conflict of interest
Yes	5	yes	no			yes	Roles and responsibilities of AO's is too vague and focussed on documentation. The detail of what AO's are responsible for, have been made the Accredited Surveyors responsibility.	yes	yes	The FTL Surveyor and the AO's cannot be employed by the same company or group of companies.	no		N/A " I do not rave a conflict of nterest
N/A " I have not sought information on the AGSA scheme	4	yes	no			yes		yes	yes		yes		N/A " I do not have a conflict of interest
Yes	5	yes	no			yes		5	yes	Marine Surveyor cannot perform BVI for the same vessel/voyage	yes		

s. 22(1)(a)(ii)

Please share				
Please share	Please share	your reason		
Please share	your reason	your reason	for not	
your reason	for not	for not	reporting	Please share
for not	reporting	reporting	your conflict	your reason
reporting	your conflict	your conflict	of interest -	for not
your conflict	of interest -	of interest -	Belief that	reporting
of interest -	Unclear	Lack of trust	no action	your conflict
Lack of	reporting	in the	with be	of interest -
anonymity	process	process	taken	Other
Is there any other feedback you would like to provide regarding the AGSA Scheme?				

See written submission

s. 22(1)(a)(ii)

Support the scheme as it is and would like to see it continue to expand with further consideration given to things like extended hours and light conditions for inspections including expanded range of inspection points at anchorage. Great scheme servicing the industry well. More and wider consultation around potentially changes would be greatly appreciated.

Working procedures for AAO should be reviewed for practical basis and conflict of interest must be more strict

NO

None

yes

There are numbers of working procedures need to changed with practical approach, conflict of interest must be more strict and more detailed outlined.

None

Have Your Say survey template

URL: <https://haveyoursay.agriculture.gov.au/>

Project title: Reviewing the Accredited Grain Surveyor Assurance Scheme

HYS team contact: s. 22(1)(a)(ii)

Communications contact: s. 22(1)(a)(ii) , Agriculture Trade and Policy External Communication Team

Business contact: s. 22(1)(a)(ii), Plant Exports Reform Program, s. 22(1)(a)(ii)

SES approver: Jemma Martin, Plant Exports Branch, 02 6272 5406

Comments: [Add any comments or instructions for the web publishing team.]

Submitting your request

[Email the completed template to haveyoursay@aff.gov.au for a usability review.]

Survey details

Survey question type

☒ Ask specific questions – multiple choice responses/free text responses

☐ Allow stakeholders to upload a written submission

Survey button text

☒ Take survey

☐ Complete form

☐ [custom text of 1 or 2 words]

Welcome

We invite you to share your feedback on the AGSA scheme via this survey. The survey will ask you if you are an accredited grain surveyor or an industry member. This helps us ensure the questions you receive are based on your interaction with the scheme.

Submissions close at **5 pm (AEDT) on xxxxxx**.

Privacy notice

‘Personal information’ means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. By completing and submitting this form, you consent to the collection of all personal information contained in this form.

Have Your Say survey template

We collect your personal information (as defined in the *Privacy Act 1988* (Cth)) for the purposes of consulting with you regarding the review of the Accredited Grain Surveyor Assurance Scheme. If you do not provide some or all of the personal information requested, we will be unable to contact you to discuss or respond to your submission.

Your personal information may be published on the department's website, disclosed to parliament, other Australian agencies, persons or organisations where necessary for the above purposes, provided the disclosure is consistent with relevant laws, in particular the *Privacy Act 1988* (Cth). Your personal information will be used and stored in accordance with the [Australian Privacy Principles](#).

If you provide personal information about an individual other than yourself, you must provide the department with the written consent of that individual.

See our [Privacy Policy](#) to learn more about accessing or correcting personal information or making a complaint. Alternatively, email privacy@aff.gov.au or phone us on +61 2 6272 3933.

I have read and understood the privacy notice and consent to the collection, use and disclosure of my personal information as outlined in the privacy notice.

☐ Yes [mandatory]

Declaration

To be completed by the person submitting the response.

I understand that:

- the Australian Government reserves the right to refuse to publish information that contains offensive language, potentially defamatory material or copyright infringing material
- a request may be made under the *Freedom of Information Act 1982* (FOI Act) for access to my submission, including if it is marked confidential. Such requests will be determined in accordance with provisions of the FOI Act
- in lodging a submission, I warrant that to the best of my knowledge, I have not infringed any third-party Intellectual Property Rights
- I retain ownership of the intellectual property contained in my submission, however in lodging this submission, I grant the Commonwealth a permanent, irrevocable, royalty-free, worldwide, non-exclusive licence to use, adapt, modify and communicate the intellectual property in the submission for the purpose of undertaking research, developing and publishing policies, programs, and reports.

I have read and understood this declaration.

Have Your Say survey template

☐ Yes [mandatory]

About you

Please fill in your details. This will allow us to contact you about your submission, if required. We will not publish your details on the website.

First name [mandatory field] [free text field]

Last name [mandatory field] [free text field]

Email [mandatory field] [email]

Which of the following best describes your situation? [multiple choice]

- ☐ Member of the public
- ☐ Marine Surveyor or Accredited Marine Surveyor
- ☐ Industry representative
- ☐ Vessel owner
- ☐ State or territory government
- ☐ Authorised Officer or Bulk Vessel Authorised Officer
- ☐ Other (please specify)

Survey questions

1. Are you an accredited marine surveyor? [mandatory]

Yes/No

2. [Conditional – ‘No’ to Q1] Do you rely on the services of an accredited marine surveyor? [mandatory]

Yes/No

3. [Conditional – ‘yes’ to Q2] How do you engage their services?

Select all that apply.

[Multiple choice]

- a. Own employee
- b. Directly contracted/subcontracted
- c. Outsourced (e.g. by a third-party contractor/subcontractor)

Have Your Say survey template

d. Other [Please specify]

4. Is information on the AGSA scheme readily available?

[Radio button]

- a. Yes
- b. No
- c. N/A – I have not sought information on the AGSA scheme

5. Please rate how informed you feel about the AGSA Scheme

[radio button]

- a. Not at all informed
- b. Minimally informed
- c. Somewhat informed
- d. Well informed
- e. Very well informed

[page break]

AGSA Support [subheading]

6. [Conditional – ‘Yes’ to Q1] Do you know who to contact for support when performing your accredited marine surveyor duties? [mandatory]

Yes/No

7. [Conditional – ‘No’ to Q1] Do you know who to contact for support when you need assistance with the duties being performed by an accredited marine surveyor? [Mandatory]

Yes/No

8. Have you contacted somebody for support in the past?

Yes/No

9. [Conditional – ‘Yes’ to Q8] Please detail what your support needs were and if they were met.

[long text]

10. [Conditional – ‘Yes’ to Q8] If you contacted AIMS for support, how would you rate the helpfulness and expertise of the AIMS staff?

Have Your Say survey template

[Radio button]

- a. Very helpful
- b. Helpful
- c. Neutral
- d. Not very helpful
- e. Unhelpful
- f. N/A

11. [Conditional – ‘Yes’ to Q8] If you contacted DAFF for support, how would you rate the helpfulness and expertise of the DAFF staff?

[Radio button]

- a. Very helpful
- b. Helpful
- c. Neutral
- d. Not very helpful
- e. Unhelpful
- f. N/A

[Page break]

Standard [subheading]

An important information source specific to the AGSA Scheme is the ‘Standard for empty bulk vessel surveys by accredited marine surveyors’. A marine surveyor must meet the requirements to be accredited as described within the Accreditation Policy. The aim of the Standard is to ensure that a bulk vessel condition supports phytosanitary certification by improving bulk vessel survey and inspection practices.

Commented [s. 22(1)]: Link to AIMS website:
[Standard-for-Empty-Bulk-Vessel-Surveys-V3.1-2025.pdf](#)

Commented [s. 22(1)]: Link to AIMS website:
[Accreditation-Policy-2025.pdf](#)

12. Have you read the Standard?

Yes/No

[If ‘No’ – “Please read the Standard attached to this survey and then continue with the survey”]

13. Please provide your comments on the Standard, for example, is it easy to follow, does it contain the information you need to complete your survey.

[Long text]

14. [Conditional – ‘No’ to Q1] Please rate how aware you are of what is required of an accredited marine surveyor when they apply for accreditation

Have Your Say survey template

- a. Very unaware
- b. Unaware
- c. Somewhat aware
- d. Aware
- e. Very aware

[If 'a' or 'b' – "Please read the Standard and Accreditation Policy that describes the requirements for a marine surveyor to apply for accreditation and then continue with the survey"]

15. [Conditional – 'Yes' to Q1] Do you follow the inspection procedures described within the Standard?

Yes/No

16. [Conditional – 'No' to Q15] Please tell us why

[Long text]

[page break]

Conflict of Interest [subheading]

An accredited marine surveyor must declare any real or perceived conflicts of interest as part of their application and renewal processes associated with accreditation. More information on how conflicts of interests are managed is available by reading the **AGSA Interim Conflict of Interest Guidance Note**.

17. In the context of the AGSA Scheme, do you know what a conflict of interest is?

Yes/No

18. Please tell us your understanding of what a conflict of interest is and how a marine surveyor must manage it.

[long text]

19. Do you agree with how accredited marine surveyor conflicts of interest are defined and managed?

[Yes/No]

20. Please tell us why

[long text]

21. [Conditional – 'Yes' to Q1] If you have a conflict of interest, real or perceived, have reported it?

Commented [s. 22]: Link to AIMS website:
[AGSA-INTERIM-Conflict-of-Interest-Guidance-Note-JUNE-2025-2.pdf](#)

Have Your Say survey template

- a. Yes
- b. No
- c. N/A – I do not have a conflict of interest

22. [Conditional – ‘No’ to Q 15] Please share your reason for not reporting your conflict of interest

Select all that apply

[Multiple choice]

- a. Fear of retaliation
- b. Lack of anonymity
- c. Unclear reporting process
- d. Lack of trust in the process
- e. Belief that no action will be taken
- f. Other [Please specify]

[page break]

Finish [subheading]

23. Please provide any other feedback you have regarding the AGSA Scheme.

[long text]

Submit button

Acknowledgement

Thank you for sharing your feedback. Your views will help us to implement improvements to the operation of the AGSA Scheme.

s. 22(1)(a)(ii)

From: Plant Export Regulation Reform
Sent: Tuesday, 19 May 2026 3:03 PM
To: s. 22(1)(a)(ii); AIMS Grain
Cc: Plant Export Regulation Reform; s. 22(1)(a)(ii)
Subject: Meeting #21 DAFF_AIMS AGSA Scheme review [SEC=OFFICIAL]
Attachments: RE: Standard update - to reflect AO and marine surveyor change in management requirements [SEC=OFFICIAL]; 20260519 Draft_tracked_AGSA Accreditation Policy.docx; 20260518 Draft_tracked_AGSA Complaint Handling and Investigation Policy.docx; 20260501 AGSA Scheme conflicts of interest guidance note.docx; AGSA meeting dates and topics.docx

Categories: s. 22(1)(a)(ii), Legislation

OFFICIAL

Hi s. 22(1)(a)(ii) and s. 47F(1),

Thanks for the discussion on Monday (moved from previous Thurs), we covered a lot of information in a short period of time. We also welcomed Eric McIlwain, AIMS Board Chairman and Eric Perez, AIMS CEO who, along with s. 47F(1), contributed AIMS' perspective into the discussions.

I briefly summarise the topics to be covered and noted it was likely too ambitious for an hour but we'd give it a go:

- DAFF policy shift to allow an accredited surveyor and bulk vessel authorised officer to be from the same company
- Review the two draft amended Policies – accreditation and complaints
- Review a minor edit to the new AGSA Managing the Scheme document
- Standard – seek confirmation on the finalisation of the FTL certificate and to note a minor update to the standard to reflect the DAFF change in policy mentioned above
- Discuss the new Conflicts of Interest framework
- Need to DAFF style guide all documents
- Summary of HYS feedback
- Overview of AIMS conference

s. 22(1)(a)(ii) discussed his reasons for changing the policy regarding the employment arrangements of an accredited surveyor and the bulk vessel authorised officer. In summary, the inclusion of grain clean in previous versions of the Standard introduced issues with conflicts of interest. By removing grain clean, and the work we did to clearly differentiate the role and responsibilities of each, has lessened the circumstances that might involve a conflict of interest as both roles are now distinct from each other. We agreed that the Standard no longer including grain clean, and the requirement for any accredited surveyor to declare their interest where they are employed by the same company employing the inspecting authorised officer, would be reasonable and manageable under the new conflicts of interest framework. **Proposed alternate text circulated on email for discussion on Thurs if not approved prior – email attached.**

We then had a look at a minor edit I made to the managing the scheme document under joint responsibilities to include a brief description of skills and experienced that are required for individuals administering the scheme (AIMS) or overseeing the scheme (DAFF). This was to support succession planning as staff in either AIMS or DAFF change and to document the foundational competency needed. The draft amendments were accepted, which means this document is now ready for 'style guiding' and finalisation.

We then reviewed the highlighted text in the complaints handling policy and discussed what, if any, changes were needed. There were only two changes needed for this policy; update to the DAFF email address and minor updates to section 8 due to the impact of extending the renewal period to 2 years and to include that AIMS will provide advice on the remedial action needed to remedy the reason for suspension. **Updated word version attached with tracked changes for your review and discussion on Thursday.**

We then reviewed the highlighted text in the accreditation policy, noting these were more substantial than the complaints policy. Most of the changes related to the move to biennial renewal and submission of renewal applications by 15 June, hence a range of text edits have been included to reflect these changes. Other changes included updating annual fee to accreditation fee and including the requirement for surveyors to sign the new AGSA Code of Conduct as part of the requirement documents for accreditation. We spent some time on section 9 Timing of applications for accreditation and AIMS offered to review this section and provide updated text for consideration on Thursday. To help with this, **I've attached an updated word version with the changes in track but pending updates to section 9 for discussion on Thursday.**

s. 47F(1) advised that there is a minor updated needed to the FTL certificate and will provide an updated certificate to DAFF that will then be the finalised certificate attached to the Standard.

We discussed the conflicts of interest framework that s. 47F(1) and I looked at last Wed (13 May) having shared the documents with AIMS earlier. Noting our discussion was a bit rushed last week s. 47F(1) has since looked at the documents and provide feedback on the conflict of interest guidance note. AIMS were happy with the suite of documents (guidance note, disclosure and management form, risk matrix and management strategy table) noting that they will hold further information sessions with marine surveyors to introduce the framework. We do expect some initial implementation issues as it is more involved, but all agreed that it was a robust framework based on disclosure and management rather than prohibition. **I have attached an updated guidance note with tracked changes to show how I have responded to the feedback for discussion on Thursday.**

With regard to the Standard, DAFF has sought 'showstopper' comments from s. 22(1)(a)(ii) and s. 22(1)(a)(ii) these are pending and due COB Wed. Depending on the scope of changes proposed, I will either share an updated version with you on Thurs or summarise the feedback. The Standard is the last of the documents we need to finalise prior to opening for renewals and will be the main focus of my work towards the end of this week and possibly into next week depending on the feedback.

I advised that a number of submissions received through the Have Your Say survey were in relation to conflicts of interest, however I'm not able to discern if the feedback relates to the historical state introducing rules or the current state as published on the AIMS website. I advised that I will be working through the feedback but had had a look at the submissions from s. 22(1)(a)(ii) and s. 22(1)(a)(ii) I advised that s. 22(1)(a)(ii) submission included more comments on the conflicts of interest requirements and I was satisfied that the new conflicts of interest framework being implemented would address most of their feedback. DAFF (s. 22(1)(a)(ii) and s. 22(1)(a)(ii) [a/g PERP director]) were also supportive of implementing the new framework to support the opening of renewals. I also acknowledged that DAFF will be engaging further with s. 22(1)(a)(ii) and s. 22(1)(a)(ii) to understand their feedback and consider what this may mean but this would occur after the opening for renewals, meaning that we will move forward with implementing the revised Standard and introduce the new conflicts of interest framework.

Eric, CEO, provided AIMS' views on industry engagement, more so as it related to conflicts of interest and engagement opportunities. Eric noted that both s. 22(1)(a)(ii) and s. 22(1)(a)(ii) were offered the opportunity to provide their feedback and suggestions for consideration as it relates to the management of conflicts of interest, but that was over 6 months ago with no submissions received to date. Eric highlighted that AIMS are implementing a system for individual accredited surveyors to meet the requirements of DAFF under legislation and we want to ensure that if audited, we will meet our requirements under the Deed as well as DAFFs expectations. s. 22(1)(a)(ii) agreed noting that there were performance issues for both accredited surveyors and bulk vessel authorised officers and that we are raising the standard across the system.

Eric, Chairman, agreed with discussion and noted that the system is to protect everyone and was particularly interested in ensuring that our system was support grain exports was sufficiently robust to protect the value of these exports by upholding the integrity of surveys.

Not discussed on Monday but am advising now that I have added the AIMS logo to most of the documents, but please let me know if you've any concerns with this. We still need to style guide quite a few of these documents so when you see them at finalisation they may look a bit different and have some minor amendments to the text to reflect the tidy up and style guide requirements. I'll definitely let you know if there are any major changes or changes that affect the intention or purpose of a particular statement, but please let me know if you'd like to see all changes before I finalise them.

I wrapped up by summarising the likely agenda for Thurs 21 May would be to focus on the standard and showstopper feedback from ^{s. 22(1)(a)(} and ^{s. 22(1)(a)(i)} We can also revisit any comments and feedback on the attached documents so that I can progress them for finalisation.

As always, please let me know if I've missed anything or inadvertently misrepresented our discussion. I've also attached our running agenda of meeting dates and topics, updated after we met on Monday.

Looking forward to meeting again on Thursday, see you then.

Kind regards,

s. 22(1)(a)(ii)

Assistant Director | Plant Export Reform Program | s. 22(1)(a)(ii)

Department of Agriculture, Fisheries and Forestry
Plant Exports Branch | Plant and Live Animal Exports, Welfare and Regulation Division
Agriculture House, 70 Northbourne Ave, Canberra ACT 2601 Australia
GPO Box 858 Canberra ACT 2601 Australia
agriculture.gov.au



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.

OFFICIAL

s. 22(1)(a)(ii)

From: AIMS Grain <grain@aimsurveyors.com.au>
Sent: Tuesday, 19 May 2026 9:46 AM
To: Plant Export Regulation Reform; s. 22(1)(a)(ii)
Cc: s. 22(1)(a)(ii) ; s. 22(1)(a)(ii)
Subject: RE: Standard update - to reflect AO and marine surveyor change in management requirements [SEC=OFFICIAL]

OFFICIAL

Hi ^{s. 22(1)(a)(ii)},
I think this is good. Thanks very much.

s. 47F(1)

OFFICIAL

From: Plant Export Regulation Reform <plantexportreform@aff.gov.au>
Sent: Monday, 18 May 2026 12:44 PM
To: ^{s. 22(1)(a)(ii)} <^{s. 22(1)(a)(ii)}>; AIMS Grain <grain@aimsurveyors.com.au>
Cc: ^{Ss. 22(1)(a)(ii)} <^{s. 22(1)(a)(ii)}@aff.gov.au>; Plant Export Regulation Reform <plantexportreform@aff.gov.au>; ^{s. 22(1)(a)(ii)} <^{s. 22(1)(a)(ii)}@aff.gov.au>
Subject: Standard update - to reflect AO and marine surveyor change in management requirements [SEC=OFFICIAL]
Importance: High

OFFICIAL

Hi ^{s. 22(1)(a)(ii)} and ^{s. 47F(1)},

Apologies I couldn't find this in the Standard during the meeting but here is what I was referring to:

Standard, as currently worded under 3. Roles and Responsibilities:

1. The AO, as a Government representative, must be independent at all times. Consistent with the accredited marine surveyor, the AO cannot be under the same management as the accredited marine surveyor.
2. The accredited marine surveyor must be independent at all times. Consistent with the AO, the accredited marine surveyor cannot be under the same management as the AO.

Alternate text for your consideration under 3. Roles and Responsibilities:

1. The inspection AO, as a government representative, must remain independent at all times in the performance of their functions. The AO may be under the same management as the accredited marine surveyor; however, independence must be maintained through appropriate identification, disclosure, and management of conflicts of interest.
2. The accredited marine surveyor must remain independent at all times in the performance of their functions. The accredited marine surveyor may be under the same management as the AO; however, independence must be maintained through appropriate identification, disclosure, and management of conflicts of interest.

Is this acceptable? If not, please advise alternate text and I'll update the Standard ahead of our meeting on Thursday.

Thanks

s. 22(1)(a)(ii)

OFFICIAL

----- IMPORTANT - This email and any attachments have been issued by the Commonwealth of Australia (Commonwealth). The material transmitted is for the use of the intended recipient only and may contain confidential, legally privileged, copyright or personal information. You should not copy, use or disclose it without authorisation from the Commonwealth. It is your responsibility to check any attachments for viruses and defects before opening or forwarding them. If you are not an intended recipient, please contact the sender of this email at once by return email and then delete both messages. Unintended recipients must not copy, use, disclose, rely on or publish this email or attachments. The Commonwealth is not liable for any loss or damage resulting from unauthorised use or dissemination of, or any reliance on, this email or attachments. If you have received this e-mail as part of a valid mailing list and no longer want to receive a message such as this one, advise the sender by return e-mail accordingly. This notice should not be deleted or altered -----

s. 22(1)(a)(ii)

From: s. 22(1)(a)(ii)
Sent: Tuesday, 2 June 2026 1:22 PM
To: s. 22(1)(a)(ii)
Cc: Plant Export Regulation Reform; s. 22(1)(a)(ii)
Subject: Bulk vessel IM - updates for AGSA [SEC=OFFICIAL]

Categories: s. 22(1)(a)(ii), Legislation

OFFICIAL

Hi ^{s. 22(1)(a)(ii)},

We're looking at amending the IM for bulk vessels to reflect the change in policy to allow the accredited marine surveyor and the BVI AO to be from the same company. We will try and use this phrasing from the Standard to keep the wording consistent across all materials, although we may need to tweak it depending on the surrounding text/context within the IM:

1. The inspection AO, as a government representative, must remain independent at all times in the performance of their functions. The AO may be under the same management as the Accredited Marine Surveyor; however, independence must be maintained through appropriate identification, disclosure and management of conflicts of interest.
2. The Accredited Marine Surveyor must remain independent at all times in the performance of their functions. The Accredited Marine Surveyor may be under the same management as the AO; however, independence must be maintained through appropriate identification, disclosure and management of conflicts of interest.

We are aiming to do this relatively quickly and will prepare an IAN to advise all of these changes. I also anticipate aligning the start date of the updated IM to align with the updated Standard, which is coming into effect on 1 July, noting it is being provided to marine surveyors now applying/renewing accreditation.

Hence, can you please confirm that we only need to make changes to the following or are there any other documents that we need to update to ensure the materials are all aligned?

1. Guideline 'Inspection of empty bulk vessels for export', and
2. Work instruction 'Inspecting empty bulk vessels for export'.

And just confirming, that you're okay with what we're doing and our approach? Is there anything else that you can think of that I need to be aware of when doing this?

Cheers

^{s. 22(1)(a)(ii)}

OFFICIAL

s. 22(1)(a)(ii)

From: s. 22(1)(a)(ii)
Sent: Friday, 5 June 2026 8:41 AM
To: Plant Export Regulation Reform
Cc: s. 22(1)(a)(ii); s. 22(1)(a)(ii)
Subject: RE: For review please - AGSA - Draft IAN - publication of AGSA materials [SEC=OFFICIAL]

Categories: Legislation, s. 22(1)(a)(ii)

OFFICIAL

Hi s. 22(1)(a)(ii),

Thanks for the IAN on the AIMS documents.

You mention that you are waiting for the go ahead on the IM updates. I thought I said I was happy for you to do it and to run the changes through s. 22(1)(a)(ii) before publishing.

If not, can you please amend the IM in the appropriate sections and provide s. 22(1)(a)(ii) with a copy in track changes for approval.

Appreciate your assistance as always.

Happy to discuss.

Regards

s. 22(1)(a)(i)

OFFICIAL

From: Plant Export Regulation Reform <plantexportreform@aff.gov.au>
Sent: Thursday, 4 June 2026 4:55 PM
To: s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>
Cc: s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; Plant Export Regulation Reform <plantexportreform@aff.gov.au>
Subject: For review please - AGSA - Draft IAN - publication of AGSA materials [SEC=OFFICIAL]

OFFICIAL

Hi s. 22(1)(a)(i) and s. 22(1)(a)(ii),

Before I go too much further in drafting I would appreciate your review please of this  draft IAN. It doesn't yet conform to the IAN development process, but I'm keen to make sure that we're all on the same page before I share it with AIMS and formally progress it.

s. 22(1)(a)(i), please note, after discussing the need for this IAN and the need for one for the updated GSEP IM (once you give us the go ahead) we agreed it was best to keep them separate as they target different audiences and didn't want to mix up the messages. Please let me know if you've a different view.

Also, I'm confident that IMT will clean it up nicely, always room for improvement!

Thanks

s. 22(1)(a)(ii)

OFFICIAL

s. 22(1)(a)(ii)

From: s. 22(1)(a)(ii)
Sent: Wednesday, 24 June 2026 4:09 PM
To: Plant Export Comms
Cc: s. 22(1)(a)(ii); s. 22(1)(a)(ii)
Subject: FW: Documents coming for approval - edits due to AGSA Scheme changes [SEC=OFFICIAL]
Attachments: Inspection of empty bulk vessels for export.docx; Performance standards – plant export authorised officers.docx; Authorised Officer BVI video audit checklist.docx; Inspecting empty bulk vessels for export.docx

OFFICIAL

Hi s. 22(1)(a)(ii)

Thanks for sending these through.

Due to the time constraint to get these approved for published and noting the relevant Directors have reviewed and have approved, rather than reading the entire documents I have focused on the proposed changes and can't see anything in them that are of concern.

On that basis I approve for publishing.

Thanks

s. 22(1)(a)(ii)

OFFICIAL

From: Plant Export Comms
Sent: Wednesday, 24 June 2026 4:02 PM
To: s. 22(1)(a)(ii); Plant Export Comms
Cc: s. 22(1)(a)(ii); s. 22(1)(a)(ii)
Subject: RE: Documents coming for approval - edits due to AGSA Scheme changes [SEC=OFFICIAL]

OFFICIAL

Hi s. 22(1)(a)(ii)

I have attached all four IML documents for your review and approval. This approach should be quicker than initiating new workflows within IML.

Please let me know if you need any further information.

Kind regards,

s. 22(1)(a)(ii)

OFFICIAL

From: s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>
Sent: Wednesday, 24 June 2026 2:40 PM
To: Plant Export Comms <PlantExportComms@aff.gov.au>

Cc: s. 22(1)(a)(ii) <s. 22(1)(a)(ii) >; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>
Subject: RE: Documents coming for approval - edits due to AGSA Scheme changes [SEC=OFFICIAL]

OFFICIAL

Hi s. 22(1)(a)(ii)

I'm not sure what's happened by I don't have anything in my dashboard to approve.

Thanks

s. 22(1)(a)(ii)

OFFICIAL

From: Plant Export Comms <PlantExportComms@aff.gov.au>
Sent: Wednesday, 24 June 2026 9:26 AM
To: s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>
Cc: s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>
Subject: FW: Documents coming for approval - edits due to AGSA Scheme changes [SEC=OFFICIAL]

OFFICIAL

Hi s. 22(1)(a)(ii),

Just confirming that the below documents have now been approved by s. 22(1)(a)(i) and s. 22(1)(a)(ii) and have progressed to your dashboard for approval.

I understand it is a tight turnaround, but PERP was hoping to have draft versions of these documents published to the webpage today to provide industry with a period of familiarisation ahead of the change.

If you have the capacity to review and approve today it would be greatly appreciated as IMT will still need to submit a web upload request for the publication to the website along with the IAN.

Thanks 😊

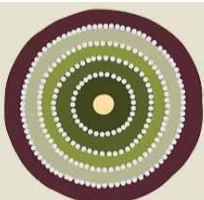
Kind regards,

s. 22(1)(a)(ii)

Assistant Director| Information Management Team| Authorised Officer Program

Department of Agriculture, Fisheries and Forestry
Plant Exports Branch | Plant & Live Animal Exports, Welfare and Regulation Division
GPO Box 858 Canberra ACT 2601 Australia

agriculture.gov.au



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.

OFFICIAL

From: Plant Export Comms <PlantExportComms@aff.gov.au>**Sent:** Thursday, 18 June 2026 3:07 PM**To:** s. 22(1)(a)(ii) <[s.22\(1\)\(a\)\(ii\)@aff.gov.au](mailto:s.22(1)(a)(ii)@aff.gov.au)>; s. 22(1)(a)(ii) <[s.22\(1\)\(a\)\(ii\)@aff.gov.au](mailto:s.22(1)(a)(ii)@aff.gov.au)>; s. 22(1)(a)(ii) <[s.22\(1\)\(a\)\(ii\)i@aff.gov.au](mailto:s.22(1)(a)(ii)i@aff.gov.au)>**Cc:** Martin, Jemma <Jemma.Martin@aff.gov.au>; s. 22(1)(a)(ii) <[s.22\(1\)\(a\)\(ii\)@aff.gov.au](mailto:s.22(1)(a)(ii)@aff.gov.au)>; s. 22(1)(a)(ii) <[s.22\(1\)\(a\)\(ii\)@aff.gov.au](mailto:s.22(1)(a)(ii)@aff.gov.au)>; s. 22(1)(a)(ii) <[s.22\(1\)\(a\)\(ii\)@aff.gov.au](mailto:s.22(1)(a)(ii)@aff.gov.au)>; Plant Export Comms <PlantExportComms@aff.gov.au>**Subject:** Documents coming for approval - edits due to AGSA Scheme changes [SEC=OFFICIAL]

OFFICIAL

Hi ^{s. 22(1)(a)(ii)} s. 22(1)(a)(ii) and ^{s. 22(1)(a)(ii)} s. 22(1)(a)(ii),

I am writing to let you know that the following documents will soon be sent to you through the approval workflow. ^{s. 22(1)(a)(ii)} will be listed as Approver 1 of the first 3 documents below and ^{s. 22(1)(a)(ii)} on the final document. ^{s. 22(1)(a)(ii)} will be listed as Approver 2.

- Exports process instruction: *Inspection of empty bulk vessels for export*
- Exports work instruction: *Inspecting empty bulk vessels for export*
- Exports reference: *Authorised Officer BVI video audit checklist*
- Exports reference: *Performance standard - Plant export authorised officer audits.*

The documents have been edited by PERP following a review of the [Accredited Grain Surveyor Assurance \(AGSA\) Scheme](#) conducted by the department and Australasian Institute of Marine Surveyors. The key shifts in policy are that Accredited Marine Surveyors and bulk vessel inspection authorised officers (BVI AOs) may now be employed by the same company or companies that are under the same management or corporation, with appropriate management of conflicts of interest. This change comes into effect on **1 July 2026**. As a result, relevant references across associated instructional material have been updated, within that limited scope.

We have completed the IMT review and the only other edits we have made are updates to the document templating and formatting. They are now ready to progress through the approval workflows.

The intention is to have the draft versions of the instructional material available on the website prior to 1 July, so that users can familiarise themselves with this change, which is a positive change and hopefully will be well received by industry.

I understand Jemma will be going on leave soon and that ^{s. 22(1)(a)(ii)} s. 22(1)(a)(ii), you will be acting in her role. We would appreciate your support in progressing the approvals as soon as possible, noting PERP is hoping to publish the documents by **24 June 2026**. This will give industry time to review the changes and understand them before they are implemented on 1 July 2026.

Please let me know if you have any questions or need any further information.

Thanks 😊
Kind regards,

^{s. 22(1)(a)(ii)} s. 22(1)(a)(ii)

Assistant Director | Information Management Team | Authorised Officer Program

Department of Agriculture, Fisheries and Forestry
Plant Exports Branch | Plant & Live Animal Exports, Welfare and Regulation Division
GPO Box 858 Canberra ACT 2601 Australia

Power Apps | IML Audit History

Share

Audit Log

Document Details

Created

:

2017-09-14T04:04:03Z

Name

:

Inspecting empty bulk vessels for export.docx

Working Document ID

:

IMLS-9-3664

Audit History

Created	Title	User	Audit Comments
01/07/2026 08:41	Admin Publish	s. 22(1)(a)(i)	Workflow started at 2026-06-30T22:41:09.0479057Z Inspecting empty bulk vessels for export has been admin published
29/06/2026 10:39	Admin Publish		Workflow started at 2026-06-29T00:39:16.0957827Z Inspecting empty bulk vessels for export has been admin published
29/06/2026 10:35	Admin Publish		Workflow started at 2026-06-29T00:35:53.9736990Z Inspecting empty bulk vessels for export has been admin published
29/06/2026 10:32	Publish		Workflow started at 2026-06-29T00:32:23.2075893Z Inspecting empty bulk vessels for export has been published
24/06/2026 16:20	Approval Initiation : Completed	s. 22(1)(a)(ii) @aff.gov.au	Approval Initiation Completed Instructions: No action required - IMT initiating the approval workflow. Comments:

Document Title: Inspecting empty bulk vessels for export

24/06/2026 16:20

Approval Request 2 : Completed

s. 22(1)(a)(ii) @aff.gov.au

Approval Request 2 Completed
Instructions: Hi s. 22(1) and s. 22(1)(a)(i)
As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme.
Thanks.
s. 22(1)(a)(i)
Comments: Approval received from s. 22(1)(a)(i) via email on Wednesday 24 June 2026: Hi s. 22(1)(a)(i)
Thanks for sending these through.
Due to the time constraint to get these approved for published and noting the relevant Directors have reviewed and have approved, rather than reading the entire documents I have focused on the proposed changes and can't see anything in them that are of concern.
On that basis I approve for publishing.
Thanks
s. 22(1)(a)(i)

Document Title: Inspecting empty bulk vessels for export

18/06/2026 16:12

Approval Request 2

s. 22(1)(a)(ii) @aff.gov.au

Document has been sent to approver 2.
This is system generated message.
Instructions: Hi s. 22(1) and s. 22(1)(a)(i)
As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme.
Thanks.
s. 22(1)(a)(ii)
Service Request: SRS-13452
Assigned Approver 2 : s. 22(1)(a)(ii) @aff.gov.au

Approval Request 1 : Completed

18/06/2026 16:12

s. 22(1)(a)(ii) @aff.gov.au

Approval Request 1 : Completed
Instructions: Hi s. 22 and s. 22(1)(a)(i)
As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme.
Thanks.
s. 22(1)(a)(i)
Comments: please approve

Approval Request 1

18/06/2026 15:24

s. 22(1)(a)(ii) @aff.gov.au

Document Title: Inspecting empty bulk vessels for export
Document has been sent to approver 1
Service Request: SRS-13452
Instructions: Hi s. 22 and s. 22(1)(a)(i)
As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme.
Thanks.
s. 22(1)(a)(i)

			Permissions: Document Contact, s. 22(1)(a)(ii)@aff.gov.au, has been given contribute permission to the document.
18/06/2026 15:07	Approval Initiation	s. 22(1)(a)(ii)@aff.gov.au	Approval Initiated. Service Request: SRS-13452
18/06/2026 10:04	Document Drafting : Completed	s. 22(1)(a)(ii)@aff.gov.au	Permissions: Document Contact, s. 22(1)(a)(ii)@aff.gov.au, has been given contribute permission to the document. Document Drafting Completed Instructions: Releasing document for editing. Comments: Hi IMT, this document is ready for your review as well, thank you. Document Title: Inspecting empty bulk vessels for export
18/06/2026 09:38	SME Input : Completed	s. 22(1)(a)(ii)@aff.gov.au	SME Input Completed Instructions: Hi s. 22(1) and s. 22 would appreciate if you could review the changes made to this document. Please note that the scope of the review and the changes are limited to only references of mutual employment of marine surveyors and BVI AOs. As the intention is to publish draft versions of the IM along with the IAN prior to the date of effect of the change, could you please provide your comments and feedback by COB 17 June to allow for IMT review and delegate approvals. Comments: Document Title: Inspecting empty bulk vessels for export
17/06/2026 13:02	SME Input : Completed	s. 22(1)(a)(ii)@att.gov.au	SME Input Completed Instructions: Hi s. 22(1) and s. 22 would appreciate if you could review the changes made to this document. Please note that the scope of the review and the changes are limited to only references of mutual employment of marine surveyors and BVI AOs. As the intention is to publish draft versions of the IM along with the IAN prior to the date of effect of the change, could you please provide your comments and feedback by COB 17 June to allow for IMT review and delegate approvals. Comments: change looks ok - as discussed. s. 22(1)(a) please ensure page break issues are ok when tracked changes are accepted - currently has some big spaces due to page breaks. Document Title: Inspecting empty bulk vessels for export
16/06/2026 12:46	SME Input	s. 22(1)(a)(ii)@aff.gov.au	Document has been sent to nominated SMEs. Task has been assigned to the following participants: s. 22(1)(a)(ii)@aff.gov.au Instructions: Hi s. 22(1) and s. 22 would appreciate if you could review the changes made to this document. Please note that the scope of the review and the changes are limited to only references of mutual employment of marine surveyors and BVI AOs. As the intention is to publish draft versions of the IM along with the IAN prior to the date of effect of the change, could you please provide your comments and feedback by COB 17 June to allow for IMT review and delegate approvals. Due Date: 2026-06-17T00:00:00Z
16/06/2026 12:46	SME Input	s. 22(1)(a)(ii)@aff.gov.au	Document has been sent to nominated SMEs. Task has been assigned to the following participants: s. 22(1)(a)(ii)@aff.gov.au Instructions: Hi s. 22(1) and s. 22 would appreciate if you could review the changes made to this document. Please note that the scope of the review and the changes are limited to only references of mutual employment of marine surveyors and BVI AOs. As the intention is to publish draft versions of the IM along with the IAN prior to the date of effect of the change, could you please provide your comments and feedback by COB 17 June to allow for IMT review and delegate approvals. Due Date: 2026-06-17T00:00:00Z
12/06/2026 13:17	New Document Ticket Automated - Change Document		New document ticket created using the IML New Document Ticket - Automated flow. Service Request ID: SRS-13452 Working Document ID: IMLS-9-3664
12/06/2026 13:04	Document Drafting : Cancelled	s. 22(1)(a)(ii)@aff.gov.au	Document Drafting Cancelled Comments: Cancelling the workflow task as the document is not opening for the doc contact. Cancelled on behalf of: s. 22(1)(a)(ii) Document Title: Inspecting empty bulk vessels for export
12/06/2026 12:47	Document Drafting : Completed	s. 22(1)(a)(ii)@aff.gov.au	Document Drafting Completed Instructions: Comments: Hi IMT, I am getting an error message when I try to view this document in browser saying no documents with the ID IMLS-9-3664 were found in this site collection. Would appreciate if you could check, please. Thank you. Document Title: Inspecting empty bulk vessels for export

10/06/2026 12:03	Document Drafting : Completed	s. 22(1)(a)(ii)@aff.gov.au	Document Drafting Completed Instructions: Your document drafting task has been restarted. Please continue to develop your document or open SME input tasks via the View SME input tab. Comments: Cancelling this task for s. 22(1)(a)(ii) so a new task can be initiated for s. 22(1)(a)(ii) to make edits regarding the AGSA Scheme. Document Title: Inspecting empty bulk vessels for export
16/12/2025 15:54	MetaData Publish	s. 22(1)(a)(ii)	Workflow started at 2025-12-16T05:54:42.2904286Z Inspecting empty bulk vessels for export.docx has metadata updated
07/05/2025 16:23	Document Drafting	s. 22(1)(a)(ii)	Document has been release for review. Service Request: SRS-9828 Permissions: Document Contact, s. 22(1)(a)(ii)@aff.gov.au, has been given contribute permission to the document.
20/12/2024 13:53	Document Review: Workflow Initialised	s. 22(1)(a)(ii)	Document has been released for review. Service Request SRS-9828. Permissions: Client Contact: s. 22(1)(a)(ii) has been given contribute permission to the document Inspecting empty bulk vessels for export.docx.
01/07/2023 00:03	Publish: Workflow Completed	System Account	A copy of the document has been successfully published in the Published Library.
01/07/2023 00:03	Schedule Review: Item Created	System Account	Review Scheduled 3/06/2026 12:00:00 AM
21/06/2023 08:37	Publish: Workflow Initialised	s. 22(1)(a)(ii)	Workflow started at 21/06/2023 8:37:16 AM by s. 22(1)(a)(ii)
21/06/2023 08:37	Publish: Workflow Initialised		Publish workflow paused until 1/07/2023 12:00:00 AM.
14/06/2023 11:55	QA Review: Workflow Completed	System Account	Quality assurance (QA) review on the document Inspecting empty bulk vessels for export has successfully completed. All participants have completed their tasks.
14/06/2023 11:55	QA Review : Task Completed	s. 22(1)(a)(ii)	Comments:
13/06/2023 10:01	QA Review: Workflow Initialised		Workflow started at 13/06/2023 10:01:11 AM by s. 22(1)(a)(ii) Task has been assigned to the following participants: s. 22(1)(a)(ii) Instructions: , Duration: 1 days
13/06/2023 09:39	Approval: Workflow Completed	System Account	Approval on the document has succesfully completed. All approvers have completed their task.
13/06/2023 09:39	Approver 2: Task Completed	Carr, Rossana	The document has been approved. Comments: ,
09/06/2023 16:59	Approver 1: Task Completed	s. 22(1)(a)(ii)	The document has been approved. Comments: ,
09/06/2023 14:54	Approval: Workflow Initialised	s. 22(1)(a)(ii)	Workflow started at 9/06/2023 2:53:38 PM by s. 22(1)(a)(ii) Task Title: Approve:Inspecting empty bulk vessels for export.docx. The Approver s. 22(1)(a)(ii) has been invited to approve and given read permission to the document Inspecting empty bulk vessels for export.docx.
09/06/2023 14:53	Approval: Workflow Initiated	s. 22(1)(a)(ii)	Workflow started at 9/06/2023 by s. 22(1)(a)(ii)
01/06/2023 11:36	Approval: Workflow Initialised	s. 22(1)(a)(ii)	Workflow started at 1/06/2023 11:34:02 AM by s. 22(1)(a)(ii) Task Title: Approve:Inspecting empty bulk vessels for export.docx. The Approver s. 22(1)(a)(ii) has been invited to approve and given read permission to the document Inspecting empty bulk vessels for export.docx.
01/06/2023 11:34	Approval: Workflow Initiated	s. 22(1)(a)(ii)	Workflow started at 1/06/2023 by s. 22(1)(a)(ii)
26/05/2023 15:47	TW Review : Task Completed	s. 22(1)(a)(ii)	Comments: Hi all. I was confused by the reference to AIMS until I realised that it was in relation to the Aust Institute of Marine Surveyors, not the Dept's Import Management System. .
26/05/2023 15:47	TW Review: Workflow Completed	System Account	Technical writing (TW) review on the document Inspecting empty bulk vessels for export has successfully completed. All participants have completed their tasks.
25/05/2023 14:32	TW Review: Workflow Initialised	s. 22(1)(a)(ii)	Workflow started at 25/05/2023 2:32:29 PM by s. 22(1)(a)(ii) Task has been assigned to the following participants: s. 22(1)(a)(ii)

Government of Western Australia

Department of Agriculture, Fisheries and Forestry

Power Apps | IML Audit History

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Audit Log

Document Details

Created

2017-09-14T04:03:32Z

Name

Inspection of empty bulk vessels for export.docx

Working Document ID

IMLS-9-3663

Audit History

Created	Title	User	Audit Comments
01/07/2026 08:36	Admin Publish	s. 22(1)(a)(ii)	Workflow started at 2026-06-30T22:36:50.0408957Z Inspection of empty bulk vessels for export has been admin published
01/07/2026 08:33	Admin Publish		Workflow started at 2026-06-30T22:33:35.2162896Z Inspection of empty bulk vessels for export has been admin published
28/06/2026 10:27	Publish		Workflow started at 2026-06-29T00:27:35.2685106Z Inspection of empty bulk vessels for export has been published
24/06/2026 16:22	Approval Initiation : Completed	s. 22(1)(a)(ii)@aff.gov.au	Approval Initiation Completed Instructions: No action required - IMT Initiating the approval workflow. Comments: Document Title: Inspection of empty bulk vessels for export.

24/06/2026 16:22

Approval Request 2 : Completed

s. 22(1)(a)(ii)@aff.gov.au

Approval Request 2 Completed
Instructions: Hi s. 22 and s. 22(1)(a)(ii)

As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme.

Thanks,
s. 22(1)(a)(ii)
Comments: Approval received from s. 22(1)(a)(ii) via email on Wednesday 24 June 2026:
Hi s. 22(1)(a)(ii)

Thanks for sending these through.

Due to the time constraint to get these approved for published and noting the relevant Directors have reviewed and have approved, rather than reading the entire documents I have focused on the proposed changes and can't see anything in them that are of concern.

On that basis I approve for publishing.

18/06/2026 16:13

Approval Request 1 : Completed

s. 22(1)(a)(ii)@aff.gov.au

Thanks
s. 22(1)(a)(ii)
Document Title: Inspection of empty bulk vessels for export
Approval Request 1 : Completed
Instructions: Hi s. 22 and s. 22(1)(a)(ii)

As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme.

Thanks,
s. 22(1)(a)(ii)
Comments: please approve
Document Title: Inspection of empty bulk vessels for export

18/06/2026 16:13

Approval Request 2

s. 22(1)(a)(ii)@aff.gov.au

Document has been sent to approver 2.
This is system generated message.

Instructions: Hi s. 22 and s. 22(1)(a)(ii)

As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme.

Thanks,
s. 22(1)(a)(ii)

Service Request: SRS-13434
Assigned Approver 2 : s. 22(1)(a)(ii) @aff.gov.au

18/06/2026 15:30

Approval Request 1

s. 22(1)(a)(ii)@aff.gov.au

Document has been sent to approver 1
Service Request: SRS-13434
Instructions: Hi s. 22 and s. 22(1)(a)(ii)

As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme.

Thanks,
s. 22(1)(a)(ii)

			Permissions: Document Contact, s. 22(1)(a)(ii)@aff.gov.au, has been given contribute permission to the document.
18/06/2026 15:09	Approval Initiation	s. 22(1)(a)(ii)@aff.gov.au	Approval Initiated. Service Request: SRS-13434
18/06/2026 09:17	Document Drafting : Completed	s. 22(1)(a)(ii)@aff.gov.au	Permissions: Document Contact, s. 22(1)(a)(ii)@aff.gov.au, has been given contribute permission to the document. Document Drafting Completed Instructions: Releasing document for drafting to include edits relating to the AGSA Scheme. s. 22(1) has confirmed that PERP have consulted with GSEP regarding the edits. Comments: Hi IMT, this document is ready for your review, thank you for your help with this one. Document Title: Inspection of empty bulk vessels for export
17/06/2026 12:54	SME Input : Completed	s. 22(1)(a)(ii)@aff.gov.au	SME Input Completed Instructions: Comments: content looks ok - as discussed Document Title: Inspection of empty bulk vessels for export
15/06/2026 12:39	SME Input	s. 22(1)(a)(ii)@aff.gov.au	Document has been sent to nominated SMEs. Task has been assigned to the following participants: s. 22(1)(a)(ii)@aff.gov.au Instructions: Due Date:
15/06/2026 12:12	SME Input : Cancelled	s. 22(1)(a)(ii)@aff.gov.au	SME Input Cancelled Comments: The SME is unable to view the doc his dashboard SME Input Cancelled for nominated SME: s. 22(1)(a)(ii) Document Title: Inspection of empty bulk vessels for export
12/06/2026 14:36	SME Input	s. 22(1)(a)(ii)@aff.gov.au	Document has been sent to nominated SMEs. Task has been assigned to the following participants: s. 22(1)(a)(ii)@aff.gov.au Instructions: Hi s. 22(1). As discussed, I have added your preferred option to this document under "What are the requirements for the marine surveyor?". I would be grateful if you could please review and provide your feedback and comments, if any. Thank you. Due Date: 2026-06-16T00:00:00Z
10/06/2026 11:14	New Document Ticket Automated - Change Document		New document ticket created using the IML New Document Ticket - Automated flow. Service Request ID: SRS-13434 Working Document ID: IMLS-9-3663
16/12/2025 15:54	MetaData Publish	s. 22(1)(a)(ii)	Workflow started at 2025-12-16T05:54:26.6992280Z Inspection of empty bulk vessels for export.docx has metadata updated
24/11/2023 09:01	Publish: Workflow Completed	System Account	A copy of the document has been successfully published in the Published Library.
24/11/2023 09:01	Schedule Review: Item Created	System Account	Review Scheduled 27/10/2026 12:00:00 AM
24/11/2023 09:00	Publish: Workflow Initialised	s. 22(1)(a)(ii)	Workflow started at 24/11/2023 10:00:57 AM by s. 22(1)(a)(ii)
09/11/2023 11:26	QA Review: Workflow Completed	System Account	Quality assurance (QA) review on the document Inspection of empty bulk vessels for export has successfully completed. All participants have completed their tasks.
09/11/2023 11:24	QA Review : Task Completed	s. 22(1)(a)(ii)	Comments:
06/11/2023 14:17	QA Review: Workflow Initialised		Workflow started at 6/11/2023 3:17:46 PM by s. 22(1)(a)(ii) Task has been assigned to the following participants: s. 22(1)(a)(ii) Instructions: . Duration: 7 days
06/11/2023 13:34	Approval: Workflow Completed	System Account	Approval on the document has successfully completed. All approvers have completed their task.
06/11/2023 13:33	Approver 2: Task Completed	Carr, Rossana	The document has been approved. Comments: .
06/11/2023 12:32	Approver 1: Task Completed	s. 22(1)(a)(ii)	The document has been approved. Comments: Updates applied to pages 14 and 25. the review date needs to be amended to the November date (6??) .
05/11/2023 15:26	Approval: Workflow Initialised	s. 22(1)(a)(ii)	Workflow started at 5/11/2023 1:25:11 PM by s. 22(1)(a)(ii)

Power Apps | IML Audit History

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Document Details

Created

:

2021-02-05T03:58:19Z

Name

:

Performance standards - plant export authorised officers.docx

Working Document ID

:

IMLS-9-7667

Audit History

Created	Title	User	Audit Comments
07/07/2026 13:22	Approval Initiation : Completed	s. 22(1)(a)(ii)@aff.gov.au	Approval Initiation Completed Instructions: **No action required by the document contact - IMT are initiating the approval workflow** Comments: Document Title: Performance standards - plant export authorised officers
07/07/2026 13:22	Approval Request 2 : Completed	s. 22(1)(a)(ii)@aff.gov.au	Approval Request 2 Completed Instructions: Updates include legislative references to 'sub-elements', consolidation of bulk vessel inspection section and inclusion of China log inspections. Comments: s. 22(1)(a)(ii) has advised that she is having errors appear when attempting to approve. s. 22(1)(a)(ii) has provided her approval via MStTeams message on 07/07/2026. Document Title: Performance standards - plant export authorised officers
02/07/2026 14:26	Approval Request 2	s. 22(1)(a)(ii)@aff.gov.au	Document has been sent to approver 2. This is system generated message.

02/07/2026 14:25

Approval Request 1 : Completed

s. 22(1)(a)(ii)@aff.gov.au

Approval Request 1 : Completed

Instructions: Updates include legislative references to 'sub-elements', consolidation of bulk vessel inspection section and inclusion of China log inspections.
Comments: Noted

Document Title: Performance standards - plant export authorised officers

02/07/2026 11:26

Approval Request 1

s. 22(1)(a)(ii)@aff.gov.au

Document has been sent to approver 1
Service Request: SRS-13510
Instructions: Updates include legislative references to 'sub-elements', consolidation of bulk vessel inspection section and inclusion of China log inspections.

02/07/2026 11:22

Approval Initiation

s. 22(1)(a)(ii)@aff.gov.au

Approval Initiated.

Service Request: SRS-13510
Permissions: Document Contact, s. 22(1)(a)(ii)@aff.gov.au, has been given contribute permission to the document.

02/07/2026 11:21

Document Drafting : Completed

s. 22(1)(a)(ii)@aff.gov.au

Document Drafting Completed

Instructions: **No action required by document contact - IMT will update the document with the edited version and then submit for approval**
Comments:
Document Title: Performance standards - plant export authorised officers

01/07/2026 10:06

New Document Ticket Automated - Change Document

New document ticket created using the IML New Document Ticket - Automated flow.

Service Request ID: SRS-13510

01/07/2026 08:44

Admin Publish

s. 22(1)(a)(ii)

Working Document ID: IMLS-9-7667
Workflow started at 2026-06-30T22:44:36.031684Z
Performance standards - Plant export authorised officer audit has been admin published

29/06/2026 10:15

Publish

Workflow started at 2026-06-29T00:15:18.2259798Z
Performance standards - plant export authorised officers audit has been published

24/06/2026 16:17

Approval Initiation : Completed

s. 22(1)(a)(ii)@aff.gov.au

Approval Initiation Completed

Instructions: No action required - IMT initiating the approval workflow.
Comments:
Document Title: Performance standards - plant export authorised officers audits

24/06/2026 16:17

Approval Request 2 : Completed

s. 22(1)(a)(ii)@aff.gov.au

Approval Request 2 Completed

Instructions: Hi s. 22(1)(a)(ii) and s. 22(1)(a)(ii)

			As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme. Thanks. s. 22(1)(a)(ii) Comments: Approval received from s. 22(1)(a)(i) via email on Wednesday 24 June 2026: Hi s. 22(1)(a) Thanks for sending these through. Due to the time constraint to get these approved for published and noting the relevant Directors have reviewed and have approved, rather than reading the entire documents I have focused on the proposed changes and can't see anything in them that are of concern. On that basis I approve for publishing. Thanks s. 22(1)(a)(ii)
22/06/2026 15:25	Approval Request 2	s. 22(1)(a)(ii)@aff.gov.au	Document Title: Performance standards – plant export authorised officers audits Document has been sent to approver 2. This is system generated message. Instructions: Hi s. 22(1)(a)(i) and s. 22(1)(a)(ii) As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme. Thanks. s. 22(1)(a)(ii) Service Request: SRS-13119 Assigned Approver 2 : s. 22(1)(a)(ii)@aff.gov.au
22/06/2026 15:24	Approval Request 1 : Completed	s. 22(1)(a)(ii)@aff.gov.au	Approval Request 1 : Completed Instructions: Hi s. 22(1)(a)(i) and s. 22(1)(a)(ii) As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme. Thanks. s. 22(1)(a)(ii) Comments: Approved, as per email trail. Document Title: Performance standards – plant export authorised officers audits Document has been sent to approver 1 Service Request: SRS-13119 Instructions: Hi s. 22(1)(a)(i) and s. 22(1)(a)(ii) As per my email, this document is part of the IM suite being updated with the changes to the AGSA Scheme. Thanks. s. 22(1)(a)(ii)
18/06/2026 15:29	Approval Request 1	s. 22(1)(a)(ii)@aff.gov.au	Permissions: Document Contact s. 22(1)(a)(ii) @aff.gov.au, has been given contribute permission to the document. Approval Initiated. Service Request: SRS-13119 Permissions: Document Contact s. 22(1)(a)(ii)@aff.gov.au, has been given contribute permission to the document. Document Drafting Completed Instructions: Releasing this document for the PERP edits regarding the AGSA Scheme to be managed before BSP continue with their edits. Comments: Hi IMT, this document is ready for your review - only one change is required, deletion of one sentence. BSP are okay to progress without SME input. Thank you. Document Title: Performance standards – plant export authorised officers audits
18/06/2026 15:10	Approval Initiation	s. 22(1)(a)(ii)@aff.gov.au	Permissions: Document Contact s. 22(1)(a)(ii) @aff.gov.au, has been given contribute permission to the document. Approval Initiated. Service Request: SRS-13119 Permissions: Document Contact s. 22(1)(a)(ii)@aff.gov.au, has been given contribute permission to the document. Document Drafting Completed Instructions: Releasing this document for the PERP edits regarding the AGSA Scheme to be managed before BSP continue with their edits. Comments: Hi IMT, this document is ready for your review - only one change is required, deletion of one sentence. BSP are okay to progress without SME input. Thank you. Document Title: Performance standards – plant export authorised officers audits
18/06/2026 09:42	Document Drafting : Completed	s. 22(1)(a)(ii)@aff.gov.au	Permissions: Document Contact s. 22(1)(a)(ii) @aff.gov.au, has been given contribute permission to the document. Approval Initiated. Service Request: SRS-13119 Permissions: Document Contact s. 22(1)(a)(ii)@aff.gov.au, has been given contribute permission to the document. Document Drafting Completed Instructions: Releasing this document for the PERP edits regarding the AGSA Scheme to be managed before BSP continue with their edits. Comments: Hi IMT, this document is ready for your review - only one change is required, deletion of one sentence. BSP are okay to progress without SME input. Thank you. Document Title: Performance standards – plant export authorised officers audits
11/06/2026 09:10	SME Input : Cancelled	s. 22(1)(a)(ii)@aff.gov.au	SME Input Cancelled Comments: SYSTEM GENERATED MESSAGE: Task auto-cancelled as document contact has completed the document drafting task. Comments : Draft complete with extensive stakeholder review undertaken. Document is ready for technical review please. SME Input Cancelled for nominated SME: s. 22(1)(a)(ii) Document Title: Performance standards – plant export authorised officers