



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

Exports process instruction

Management of horticulture export accredited properties operating under the packhouse grower supplier model

Direction to staff

This is official instructional material of the Department of Agriculture, Fisheries and Forestry (the department). Failure to comply with it may result in a breach of relevant legislation and/or the code of conduct under section 13(5) of the *Public Service Act 1999*.

Direction to industry

This exports process instruction outlines the requirements for the management of horticulture export accredited properties operating under the packhouse grower supplier model (PGSM/the model). All parties with roles and responsibilities explicit in this process instruction and legislation must comply with it.

Direction to accredited property packhouses

Owners/operators of accredited property packhouses operating under the packhouse grower supplier model (PGSM/the model) must meet their responsibilities as outlined in this process instruction.

Important: This process instruction must be read in conjunction with the Exports process instruction: [Management of horticulture export accredited properties](#).

Purpose of this document

This document details the policy and process for the management of horticulture export accredited properties operating under the PGSM. The PGSM is an export function which applies to accredited property packhouses.

Important: This process instruction must be read in conjunction with the Exports process instruction: [Management of horticulture export accredited properties](#).

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Roles and responsibilities

The Exports process instruction: [Management of horticulture export accredited properties](#) outlines the standard roles and responsibilities. The following table outlines additional roles and responsibilities that are specific to the PGSM.

Role	Responsibility
Internal reviewer	<ul style="list-style-type: none"> Conducting an annual, internal review of the packhouse's grower management program, documented systems and processes, and compliance in meeting the requirements of the model. Reviewing the packhouse representative's roles and responsibilities, as well as the processes and activities described in the Exports reference: Packhouse management of growers template. <p>Note: The packhouse representative cannot conduct the internal review.</p>
Packhouse manager	<ul style="list-style-type: none"> Submitting a complete application for the model which clearly documents the systems in place to ensure grower and crop monitoring standards are being met. Creating an agreement with the growers confirming the supply of product to the packhouse. Ensuring that roles and responsibilities of key personnel under the PGSM are clear and understood by all. Ensuring that the nominated packhouse representative reviews/assesses on-farm documentation activities from registration to harvest. Ensuring that grower sites visits are conducted between registration and harvest.
Packhouse representative	<ul style="list-style-type: none"> Supporting growers to meet departmental standards. Supporting growers to meet importing country requirements. Obtaining, reviewing and verifying records of crop monitoring, spray diaries and other relevant documentation for all growers and their associated farms. Conducting grower visits to validate crop monitoring activities and reports. Identifying minor issues on farm and actioning steps to resolve issues. Identifying major issues on farm, ensuring any non-compliant product from farm is appropriately removed from export, and reporting to the department immediately.

Packhouse grower supplier model (PGSM)

The PGSM is an alternative method for gaining regulatory assurance that horticulture export accredited property farms are compliant with trading partner and export regulatory requirements. The PGSM is considered an additional export function of an accredited property packhouse. Packhouses have the option to apply the additional export function to their existing accreditation.

Under the PGSM, the accredited property packhouse manager or responsible staff must have management controls in place over their grower suppliers to provide evidence to the department as well as trading partners, where applicable, that the accredited property farm obligations are being met.

Accreditation under the PGSM currently applies to the export of the following horticulture goods to protocol markets:

- Citrus
- Apples and Pears
- Kiwi Fruit
- Strawberries
- Avocados (WA only)
- Summerfruit
- Cherries
- Table Grapes

Under the PGSM, eligible accredited property packhouses are responsible for ensuring that requirements are being met at the accredited property farm/s they manage.

Packhouse representative

A nominated packhouse representative/s will be responsible for verifying that farms are compliant with the accredited properties farm and crop monitor requirements and the necessary importing country requirements.

Job functions of the packhouse representative/s include:

- conducting verification of farm activities through on-site farm inspections
- verification of crop monitoring records and spray diaries throughout the entire growing season.

Important: The packhouse representative/s must document and report any issues identified during farm verification activities through to the packhouse.

The packhouse must have a process in place to report any major issues identified post the accreditation of farms to the department for advice.

Under the PGSM, the packhouse will undergo an in-season department audit to ensure packhouse and farm obligations are being met. The farm will not be directly audited if management of the PGSM is found to be compliant at the packhouse audit.

Important: The department reserves the right at any time to conduct audits of accredited property farms managed by packhouses under the PGSM.

Prerequisite requirements

The PGSM is a voluntary model available to current horticultural export accredited properties. To be eligible to apply, the packhouse must have been accredited in the previous export season.

Current accredited properties intending to register a new packhouse are still eligible to apply under the PGSM, however the newly registered packhouse will be subject to a pre-season audit in addition to an in-season audit.

Applicants that are new to export or were not accredited in the previous export season are not eligible to apply.

Accredited properties with outstanding major Non-compliance Notices (NCNs) must resolve these before being considered for approval. Accredited properties with a history of critical NCNs will be assessed individually and may not be accredited under the PGSM.

What are the requirements for accreditation under the model?

To maintain accreditation under the PGSM, properties will be audited as per the Exports process instruction: [Audit of horticulture export accredited properties](#) to ensure:

- the manager of the packhouse has met or is able to meet the standards described in this document
- the manager of the packhouse has met or is able to meet the standards described in the Exports process instruction: [Management of horticulture export accredited properties](#)
- importing country requirements are being met.

Application process and requirements

Prior to the commencement of each season an Industry Advice Notice (IAN) will be published to advise when applications for the PGSM are open. The IAN will specify the method to submit the application and the application period. Completed applications must be submitted to [Audit and Assurance Branch](#) manually on a department approved form by email or through the applicable industry online system before the closing date listed in the IAN.

The application must be submitted with the following additional information, to the department for assessment:

- Exports reference: [Packhouse management of growers template](#), and
- any other relevant supporting documentation.

Once the application is received, the department may contact the applicant if further supporting information is required.

Packhouse management of growers template

The completed Exports reference: [Packhouse management of growers template](#) demonstrates to the department how the packhouse will meet the requirements to operate under the PGSM.

The form must be completed and submitted to the department for assessment prior to the close of the application process.

Note: Packhouse applicants that were approved to operate under the PGSM in the previous season do not need to complete a new template unless there have been changes to the business operating structure and/or farm management controls. The packhouse manager may resubmit the previously approved template at the time of application.

Further details on supporting documentation can be found in the Exports reference: [Packhouse management of growers template](#).

Accreditation notice and period

If approved, the applicant will receive a Notice of Decision from the department outlining the accreditation to operate under the PGSM.

Accreditations under the PGSM have effect for 12 months as specified on the Notice of Decision, unless specified otherwise by the Secretary, or delegate of the Secretary, of the department.

Requirements for packhouses

Packhouse managers must maintain evidence of the property's accreditation to operate under the PGSM. They must also comply with all manager's responsibilities under chapter 3 of the [Export Control \(Plants and Plant Products\) Rules 2021](#).

The following requirements are reflected in the Exports reference: [Packhouse management of growers template](#) and must be maintained throughout the growing season. The packhouse manager or responsible staff must use the form to demonstrate their documented systems and processes in meeting the requirements under the PGSM.

List of accredited properties

Packhouse manager or responsible staff must have:

- a current list of all accredited property farms that supply export product to the packhouse
- a system in place to maintain the accredited farm's list, including the removal of non-compliant blocks/growers and growers which they no longer manage or pack product for. Packhouses must notify the department of these changes
- evidence of farm's accredited properties accreditation.

Roles and responsibilities

Packhouse manager or responsible staff must have:

- a clearly defined organisational chart demonstrating the roles of each personnel involved in managing farms under the PGSM
- a full list of nominated personnel responsible for the following activities
 - Packhouse management/control
 - Packhouse representative
 - Farm management
 - Crop monitor/s
 - Internal reviewer
 - Other, as relevant.

Packhouse verification of grower activities

- The packhouse manager or responsible staff must appoint a person/s to review farm documentation such as crop monitoring, spray application records and farm diary/notes.
Note: The appointed person must not be the accredited properties farm manager and must not be directly undertaking on-farm pest and disease control measures.
- The packhouse manager or responsible staff must appoint a person/s to conduct on-farm inspections.
Note: The appointed person must not be the accredited properties farm manager and must not be undertaking on-farm pest and disease control measures.
- In some circumstances a third-party crop monitor approved by the department may be used to conduct the on-farm inspection.
- These requirements are assessed as part of the application process and must be maintained throughout the growing season as it is essential for ensuring the integrity and reliability of the information being provided to the department.
- Applicants who cannot demonstrate an appropriate level of independence may not be eligible to operate under the PGSM.

Training and education

Training program

- Packhouse manager or responsible staff must have a documented system in place to ensure all relevant parties understand the requirements outlined in the department's performance standards for farms and crop monitors and the relevant work plans/protocols.
- There must be a training program in place which includes:
 - training material, training frequency, details of trained growers and completion dates of each training activity delivered
 - farm manager and responsible staff awareness of requirements

- new farm manager and responsible staff awareness of requirements
- packhouse representative awareness of farm and packhouse requirements.

Internal review

- Packhouse manager or responsible staff must have a system in place to conduct an annual, internal review of the processes described in their management of growers' program and against the requirements of the PGSM.
- The internal review may be conducted by a third party within the packhouse and must include a review of the packhouse representative's roles and responsibilities, as well as the processes and activities described in the Exports reference: [Packhouse management of growers template](#).
Note: The internal review cannot be conducted by the packhouse representative.
- The packhouse representative may be questioned on their understanding of the requirements under the PGSM.
- Packhouse manager or responsible staff must have a process in place to record findings of the internal review which will be verified as part of the department audit.

Verification activities

Documentation review - pest management and crop monitor verification

- The packhouse representative/s must verify records submitted by their farms from the commencement of monitoring until harvest completion. The packhouse representative must determine if there have been any pest detections that are over the tolerance permitted as per the relevant work plan/protocol.
- The packhouse representative/s must have a verification program in place which includes methods for:
 - reviewing and verifying crop monitoring records
 - confirming the crop monitor is suitably trained and registered with the department where required
 - confirming that monitoring is conducted for all pests of concern as per the relevant work plan/protocol, this includes deploying and monitoring traps where applicable
 - confirming that monitoring is completed at the required intervals as per the relevant work plan/protocol.

Documentation review - farm hygiene/good agricultural practices

Packhouse manager or responsible staff must have:

- a verification program in place to ensure farms comply with farm hygiene requirements as outlined in the work plans and protocols and Exports process instruction: [Management of horticulture export accredited properties](#)
- a method of reviewing and verifying spray diaries and farm hygiene records
- confirmation that spray records meet accredited property farm requirements and appropriately address pests and diseases of concern as required.

On-farm inspection

- A packhouse representative/s must visit all farms at a minimum of once between accreditation and the completion of harvest to ensure farm hygiene requirements are being met and a pest management program is implemented. Farm site visits completed by the packhouse representative must be documented and include any issues identified and the associated rectifications.

- For growers with multiple farms, the packhouse representative/s must ensure they visit an appropriate sample of farms to ensure farm hygiene requirements are being maintained.
- Where issues are detected on the farm by the packhouse representative, there must be a system in place to document actions taken to manage these issues. Records of all farm visits and issue notifications/action requests must be retained and made available to the department on request.
- On-farm verification activities may include, but are not limited to:
 - ensuring supplied farm maps are accurate through site inspection
 - ensuring spray records are maintained and meet accredited property farm requirements
 - ensuring that farms have demonstrated harvest practices to maintain good hygiene and prevent contamination.

Important: Farms that are new to horticulture export accreditation must be visited by a packhouse representative at least once pre-season. Evidence of site visits must be documented. New farms are defined as:

- New horticulture export property - Farm located at an address that was **not accredited in the previous year**.

Action procedures

Minor issues identified

Where minor issues are identified by the packhouse representative either during the on-farm inspection or periodic review, the representative may manage these without referral to the department.

The packhouse representative must ensure that actions are taken to rectify the issues and record any actions taken. Minor issues should be documented, issued to the farm managers and followed up to ensure issues are resolved.

Note: The packhouse representative should work with the farm manager or responsible staff to ensure resolved issues do not reoccur.

Major issues identified

Major issues detected on farm by the packhouse representative must be reported to the department for further consideration. Major issues are to be reported in writing to the [Audit and Assurance Branch](#).

Instances where the packhouse representative must refer the matter include:

- Accredited property farm fails to meet the department's requirements for farms and/or performance standards for crop monitors
- Accredited property farm fails to meet their obligations under the plant export legislation
- Accredited property farm has been intentionally non-compliant, fraudulent, or corrupt
- Accredited property farm fails to meet the requirements outlined in the relevant work plans, protocols or industry guidelines for export.
- Accredited property farm has not put rectification measures in place as a result of packhouse representative advice.

Audit

All packhouses operating under the packhouse grower supplier model will be subject to an in-season department audit each season to ensure packhouse and farm obligations are being met. The farm may not be directly audited, however compliance with obligations by the farm manager or

responsible staff will be audited using a systems-based approach through the packhouse audit. If the audit of the packhouse is found to be compliant, audit of the farm may not be required.

Note: The department reserves the right at any time to conduct audits of all accredited properties, including accredited property farms being managed by packhouses under the PGSM.

For newly established protocol export markets and accredited property packhouses or farms, the department may still conduct on-site audits of farms being managed by packhouses approved under the PGSM.

Audits will be conducted in line with the Exports process instruction: [Audit of horticulture export accredited properties](#), unless specified differently by the secretary.

The auditor will conduct a review of the packhouse's management systems and processes they have in place over their grower suppliers.

Changes in circumstance

The [Audit and Assurance Branch](#) must be notified in writing immediately of any circumstance where the accredited property no longer complies with the conditions of accreditation under the model, or for any other changes that impact the packhouse's management of farms under the PGSM.

The process for applying for changes to an accredited property, or for notifying of changes in circumstance, is outlined in the Exports process instruction: [Management of horticulture export accredited properties](#).

Withdrawal, suspension and revocation of accreditation from the model

Voluntary withdrawal from the model

If a packhouse no longer wants to operate under the PGSM, they must notify the [Audit and Assurance Branch](#) in writing immediately. The packhouse and its associated farms will be subject to the standard accredited properties audit regime and on-site inspections.

Suspension and revocation

The department has the right to suspend or revoke accreditation of a packhouse from the PGSM where the packhouse is found to be non-compliant with the conditions of their accreditation.

- A packhouse and/or their associated farms may be suspended or removed from the PGSM following investigation into any serious non-compliance behaviours. For example, where a critical non-compliance is observed as a result of
 - audit outcomes
 - overseas pest detections.

Any other non-compliance issues identified may constitute grounds for the suspension or revocation of approval under the PGSM.

Record keeping

The packhouse manager and/or responsible staff must maintain completed records for all applicable activities required under the PGSM for a minimum of 2 years.

The department must retain documentation related to accredited properties under the PGSM for a minimum of 2 years.

Related material

The following related material is available on the department's [Plant Export Operations Manual \(PEOM\)](#):

- Exports process instruction: *Management of horticulture export accredited properties*
- Exports process instruction: *Audit of horticulture export accredited properties*
- Exports reference: *Performance standards for the packhouse grower supplier model*
- Exports reference: *Performance standards for packhouses*
- Exports reference: *Performance standards for farms*
- Exports reference: *Performance standards for crop monitors*
- Exports reference: *Application for the packhouse grower supplier model*
- Exports reference: *Packhouse management of growers template*

Contact information

- Audit and Assurance Branch: AuditServices@aff.gov.au
- Horticulture Exports Program: HorticultureExports@aff.gov.au

Document information

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The following table details the published date and amendment details for this document.

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1.0	01/11/2023	01/11/2023	New document	First publication of this work instruction.
2.0	16/12/2024	16/12/2024	Major Change	Updated to expand the scope of eligible horticulture commodities and clarity of requirements.

Appendix A: Definitions

The following table defines terms used in this document.

For a full list of definitions relating to horticulture export accredited properties refer to the following:

- Exports process instruction: [Management of horticulture export accredited properties](#)
- Exports process instruction: [Audit of horticulture export accredited properties](#).

Term	Definition
Documented system	<p>A written document that:</p> <ul style="list-style-type: none"> • defines the processes and procedures for work tasks conducted by packhouses • includes the records that confirms the process is being followed. <p>Note: Under this model, the information provided by the packhouse in the Exports reference: Packhouse management of growers template may form part of a documented system.</p>
Level of independence	Where personnel conducting verification of an activity are different to the personnel directly involved in carrying out the activity.
Major issues	<p>Are identified by the Packhouse representative when there is action, inaction or contravention of departmental requirements that:</p> <ul style="list-style-type: none"> • results in a situation that may lead to the phytosanitary status of prescribed goods to be compromised • may lead to export of prescribed goods that are not export compliant.
Minor issues	<p>Are identified by the Packhouse representative when there is action, inaction or contravention of departmental requirements that:</p> <ul style="list-style-type: none"> • results in a situation that may compromise the integrity of systems, processes or premises that are designed to maintain phytosanitary status of prescribed goods.
Verification	A process to check relevant requirements are being met. This may be conducted through activities such as on-site visits or reviewing written records.

Appendix B: Legislative framework

The following list outlines the legislation that applies to the management of horticulture export accredited properties approved under the PGSM operation.

- *Export Control Act 2020*
 - Chapter 3 – Accredited Properties
 - Part 1 of Chapter 9 – Audits
 - Part 5 of Chapter 11 – Records
- Export Control (Plant and Plant Products) Rules 2021
 - Section 2-3 and 2-4 – Prohibited export and prescribed export conditions
 - Chapter 3 – Accredited Properties
 - Chapter 9 – Audits
 - Part 1 of Chapter 11 – Records
- *Export Control (Fees) Rules 2021*
- *Work Health and Safety Act 2011*
- Work Health and Safety Regulations 2011
- *Privacy Act 1988*
- *Public Service Act 1999.*