

**WORK INSTRUCTION**

**Inspecting hay and straw bales for export in-line and end-point**

**Direction to staff**

You must comply with this instructional material under the Practice Statement Framework.

**Direction to authorised officers**

Authorised officers must exercise powers and perform functions in accordance with any lawful directions or instructions issued by the department.

**Summary of main points**

This document outlines the procedures for inspection authorised officers (AOs) to follow when inspecting hay and straw bales, in-line and end-point including:

* pre-inspection tasks
* sampling tasks
* inspection tasks
* pass and failure procedures
* documentation requirements.

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## Purpose of this document

This document details the procedure for inspecting hay and straw bales (plant-based baled stock feeds) for export using in-line and end-point sampling for the following commodities:

* hay
* straw
* compound feed
* mixed fermented feed and silage
* chaff.

**Note**: For the purpose of this document, any baled plant-based stock feeds are referred to as hay and straw bales.

## Definitions

All terms used in this document and their definitions are captured in the Guideline: [*Inspection of hay and straw for export*](#_Related_material)(the guideline).

## Policy statement

* The policy and process related to this work instruction is contained in the guideline. AO’s must read and comply with the policy and process requirements set out in the guideline and relevant legislation.
* Prior to conducting an inspection, the AO must have achieved competency in the relevant inspection technique for the job function HAS3001.
* This document is to be used in conjunction with the importing country’s requirements (ICRs) listed in import permits and the Manual of Importing Country Requirements ([Micor](#_Related_material)).

**Note:** Where the importing-country requirements (ICRs) contradict the requirements in this document, the ICRs must take precedence.

## Legislative framework

The legislation that applies to the phytosanitary inspection of prescribed grain and plant products for export can be found in the guideline.

## Roles and responsibilities

The following table outlines the roles and responsibilities undertaken when inspecting hay and straw for export.

| Role | Responsibility |
| --- | --- |
| Inspection AOs | * Validating supporting documents.
* Sampling and inspecting hay, straw, chaff, compound feed, mixed fermented feed and silage for export.
* Recording and submitting the results of the inspection.
 |

## Work health and safety

AOs must:

* read and be familiar with the Reference: [*Work health and safety in the plant export environment*](#_Related_material).
* read, consider and comply with work health and safety (WHS) requirements set out in the guideline.
* not enter work sites unless it is safe, they are wearing the required personal protective equipment (PPE) and have considered any WHS hazards.
* comply with applicable Commonwealth, state and territory WHS legislation.
* comply with WHS requirements of employers and third party sites, unless they assess the requirements as placing them at risk, in which case they must take reasonable action to ensure their safety.

### Personal protective equipment

Inspection AOs must wear the following PPE for hay and straw inspections:

* hi-visibility vest
* safety boots.

Inspection AOs must have the following PPE with them and use when required:

* first aid kit
* water
* sunscreen
* appropriate emergency communication equipment such as a phone carrier with coverage or satellite phone.

An AO must wear the following PPE where required by the work site or where they have identified a risk in the work environment:

* long sleeve clothing
* steel cap boots
* hard hat
* hearing protection
* face mask
* portable gas detector.

**Note:** For more information regarding WHS responsibilities, see the Reference: [*Work health and safety in the plant export environment*](#_Related_material)*.*

## Essential equipment

AOs must have the following inspection equipment:

* knife and scrapers
* clean sieve/s (large and pocket)
* torch
* tweezers and probes
* hand lens 10x magnification or more
* small artist’s paint brush
* vials and tubes
* 80 percent ethanol preservative
* snap-lock plastic bags
* labels
* pencils for labelling vials and pens for completing forms
* a device with access to the Plant Exports Management System or manual inspection record for contingency purposes

**Note:** For more information regarding the inspection equipment, see the Reference:[*Plant export guide—equipment*](#_Related_material)*.*

### System requirements

AO must have access to the following systems:

* department website
* Manual of Importing Country Requirements (Micor)
* Plant Exports Management System (PEMS)
* Electronic Export Documentation System (EXDOC) (for departmental AOs only).

## Prepare for inspection

### Section 1: How do I prepare for inspection?

The following table outlines how an AO will prepare for inspection.

| Step | Action  |
| --- | --- |
| 1. | Review the inspection request details.

| If you are... | Then... |
| --- | --- |
| an State/Territory or third-party AO  | * the inspection request must include the
* inspection appointment details
* request for permit (RFP)
* **continue to Step 2.**
 |
| a departmental AO  | **continue to Step 2.**  |

 |
| 2. | Determine if the inspection is for a new consignment, re-export consignment or a resubmitted consignment. **Note:** Re-export RFPs will have endorsement number 6536.

| If the consignment... | Then... |
| --- | --- |
| is new | **continue to Step 3.**  |
| for re-export  | * validate the phytosanitary certificate issued by the country of origin or a certified true copy of the phytosanitary certificate issued by the country of origin in accordance with the Guideline: [*Supporting documents for plant export*](#_Related_material)
* **continue to Step 3**.
 |
| is being resubmitted | **go to** [**Section 14: How do I inspect a resubmitted consignment?**](#_Section_14:_How)  |

 |
| 3. | Check that you are accredited in the job function/s required to conduct the inspection by comparing the commodity, country, packaging and transportation information with the Reference:[*Table of authorised officer job functions*](#_Related_material)and your *Instrument of appointment*.

| If you are... | Then... |
| --- | --- |
| accredited with the required job function/s | **continue to Step 4.** |
| not accredited with the required job function/s | * you cannot conduct the inspection
* inform the client
* **do not continue.**
 |

 |
| 4. | Check that the establishment number provided (for example, on the RFP) matches the registered establishment number where the inspection is to be conducted.

| If the numbers... | Then... |
| --- | --- |
| match | **continue to** [**Section 2: How do I check the importing country’s requirements?**](#_Section_2:_How) |
| do not match | * you cannot conduct the inspection
* inform the client
* **do not continue**.
 |

 |

### Section 2: How do I check the importing country’s requirements?

The following table outlines how to check the importing country’s requirements.

| Step | Action |
| --- | --- |
| 1. | Check if there is a case in [Micor](http://micor.agriculture.gov.au/Plants/Pages/default.aspx) for each commodity on the RFP.

| If... | Then... |
| --- | --- |
| yes | **continue to Step 2.** |
| no | * the inspection request is not valid
* inform the client that they need to
* obtain the import requirements for each commodity from the importing country authority
* email these to the Micor administrator
* **do not continue.**
 |

 |
| 2. | Check the Micor case for each commodity to see if an import permit is required.

| If an import permit is... | Then... |
| --- | --- |
| required | **continue to Step 3.** |
| not required | **go to Step 5.** |

 |
| 3. | Check that the client has provided an import permit and that it is valid as per the Guideline:[*Supporting documents for plant exports*](#_Related_material)*.***Note:** The import permit may be provided by the client to the AO directly or uploaded into PEMS.

| If the client... | Then... |
| --- | --- |
| has provided an import permit and it is valid | * if the import permit is not in PEMS, take a copy of the import permit
* **continue to Step 4.**
 |
| * has provided an import permit but it is not valid

or* has not provided the required import permit
 | * the inspection request is not valid
* inform the client that they need to provide a valid import permit
* **do not continue.**
 |

 |
| 4. | Check that the requirements on the import permit match the Micor case for each commodity.

| If the import permit requirements... | Then... |
| --- | --- |
| match the Micor case/s | **continue to Step 5.** |
| * do not exist in Micor

or* do not match the Micor case/s
 | * the inspection request is not valid
* inform the client that
* the import permit does not match the Micor case
* you cannot conduct the inspection until the Micor case has been updated
* they must email the import permit or instrument in writing to the Micor administrator
* **do not continue.**
 |

 |
| 5. | Read the Micor case for each commodity to check for any documentation, sampling and inspection requirements. |
| 6. | **Continue to** [**Section 3: How do I check the RFP and supporting documentation?**](#_Section_3:_How) |

### Section 3: How do I check the RFP and supporting documentation?

The following table outlines how to check the RFP and supporting documentation.

| Step | Action |
| --- | --- |
| 1. | Check if the status on the RFP is initial (INIT) or final (FINL).

| If... | Then... |
| --- | --- |
| yes | **continue to Step 2.** |
| no | * the inspection request is not valid
* inform the client that they must submit an RFP at INIT or FINL status
* **do not continue.**
 |

 |
| 2. | Check the RFP has the correct EXDOC endorsement number/s and treatment details by comparing it to the Micor case and any other details provided in the RFP. |
| 3. | Has the client provided all supporting documents required before inspection as per the Reference:[*Plant export documents and treatments checklists*](#_Related_material) and the Micor case/s?**Important:** If Micor indicates that a particular supporting document is permitted to be provided after inspection, the details of the pending supporting document must be recorded in the *comments* Section of the inspection record.**Note:** Supporting documents may be provided by the client to the AO directly or uploaded into PEMS.

| If…  | Then... |
| --- | --- |
| yes | **continue to Step 4.** |
| no | * the inspection request is not valid
* inform the client that they need to provide all required supporting documents prior to inspection occurring
* **do not continue.**
 |

 |
| 4. | Check that all the supporting documents you have received are valid as per the Guideline:[*Supporting documents for plant exports*](#_Related_material)*.*

|  |  |
| --- | --- |
| If all supporting documents are... | Then... |
| valid | * if the supporting documents are not in PEMS, take copies of the documents
* **continue to** [**Section 4: How are the inspection results recorded?**](#_Section_4:_How)
 |
| not valid | * the inspection request is not valid
* inform the client that they need to provide valid supporting documents
* **do not continue.**
 |

 |

### Section 4: How are the inspection results recorded?

* Inspection records must be completed in accordance with the Work Instruction: [*Completing plant export inspection and treatment records*](#_Related_material)*.*
* Results must be recorded in PEMS. A manual inspection record may be used for contingency purposes only or if an exception applies.
* Record inspection details and results throughout the inspection process.
* **One inspection record** for each 24-hour period must be used for each consignment that is inspected.

**Note:** It is acceptable if the inspection record period extends over midnight to account for shifts.

The following table outlines how to initiate the inspection record in PEMS.

| Step | Action |
| --- | --- |
| 1. | Are you using PEMS or a manual inspection record to record the inspection results?

| If using… | Then... |
| --- | --- |
| PEMS | **continue to** **Step 2**.  |
| manual inspection record  | * download or print a copy of the approved manual inspection record to record your inspection
* **go to** [**Section 5: What do I do when I arrive at the registered establishment?**](#_Section_5:_What)
 |

 |
| 2. | Initiate the inspection record in PEMS.**Note:** For information on how to use PEMS see the Reference: [*Plant Export Management System Authorised officer user guide*](#_Related_material). |
| 3. | * Upload the import permit, where applicable, and record a validation outcome. Where one exists, add the import permit expiry date.
* Upload all other supporting documents and record a validation outcome for each.

**Note:** This may include but is not limited to any of the following:* treatment certificates
* gas-free certificates
* empty container inspection record
* laboratory analysis results
* pest-identification reports.
 |
| 4. | Where internet connectivity is unreliable or unknown at the registered establishment, checkout the inspection record before arriving at the site to use PEMS offline. |
| 5. | **Continue to** [**Section 5: What do I do when I arrive at the registered establishment?**](#_Section_5:_What) |

### Section 5: What do I do when I arrive at the registered establishment?

The following table outlines what to do on arrival at the registered establishment.

| Step | Action |
| --- | --- |
| 1. | On arrival at the registered establishment:* sign in at the office (if the AO is not already an employee of the site)
* ask a staff member about any site-specific work health and safety requirements including mandatory personal protective equipment (PPE)
* put on the required PPE
* assess the site for safety
* ask a staff member to accompany you to the inspection area.
 |
| 2. | Is the consignment being resubmitted for inspection?

| If… | Then... |
| --- | --- |
| yes | * record that the inspection is a reinspection and add the original RFP number on the inspection record
* add comments into the *comments* field on the method of treatment
* **continue to Step 3.**
 |
| no | **continue to Step 3.**  |

 |
| 3. | Ask the client to provide any additional supporting documents required prior to or at the time of inspection/re-inspection.**Important:** If you have not checked the importing country requirements (Section 2) or the RFP (Section 3) prior to arriving at the registered establishment, you must return to the appropriate Section and complete the procedure as written. **Note:** Supporting documents may be provided by the client to the AO directly or uploaded into PEMS.

| If... | Then... |
| --- | --- |
| no further documents are required at the time of inspection | **go to Step 5.**  |
| additional supporting documents are provided  | **continue to Step 4.** |
| not all supporting documents have been provided | * inform the client that they need to provide all required supporting documents prior to inspection occurring
* add relevant comments into the comments field of the inspection record
* **go to** [**Section 13: How do I withdraw the inspection?**](#_Section_13:_How)
 |

 |
| 4. | * Check that all the supporting documents you have received are valid as per the Guideline:[*Supporting documents for plant exports*](#_Related_material)*.*
* If the supporting documents are not in PEMS, take copies of the documents and upload them into PEMS.

|  |  |
| --- | --- |
| If all supporting documents are... | Then... |
| valid | * record the validation outcome in PEMS for each supporting document
* **continue to Step 5.**
 |
| not valid | * record the validation outcome in PEMS for each supporting document
* inform the client that they need to provide valid supporting documents
* add relevant comments into the comments field of the inspection record
* **go to** [**Section 13: How do I withdraw the inspection?**](#_Section_13:_How)
 |

 |
| 5. | Check the inspection bench meets the requirements as per the guideline.

|  |  |
| --- | --- |
| If the inspection bench is... | Then... |
| compliant | **continue to Step 6.** |
| non-compliant but rectified whilst you are on-site | * add relevant comments into the comments field of the inspection record
* **continue to Step 6.**
 |
| non-compliant and **not** rectified whilst you are on-site | * inform the client that they need to provide a compliant inspection bench
* add relevant comments into the *comments* field of the inspection record
* **go to** [**Section 13: How do I withdraw the inspection?**](#_Section_13:_How)
 |

 |
| 6. | For containers to be loaded with hay or straw bales:* the container must be approved/passed for loading in PEMS or on an empty container inspection record
* the container must be within 90 days of passing inspection
* the container must be passed as suitable to be loaded with consumable goods
* the tamper evident seal must not have been removed or tampered with

or* if an inspection sticker has been applied, the inspection sticker must
* indicate whether the container is suitable to be loaded with consumable or non-consumable goods
* be within 90 days of passing inspection
* not have been removed or tampered with
* the tamper evident seal must not have been removed or tampered with.

**Note:** If containers are not on site there is no requirement to check container approval.

| If the container is…  | Then... |
| --- | --- |
| passed inspection within 90 days of inspection, suitable to be loaded with consumable goods and the tamper evident seal is intact | **go to Step 9.** |
| non-compliant but rectified whilst you are on-site(that is, the container has been reinspection and passed to a consumable level prior to the consignment being inspected)**Important:** Onlyan AO with the ECI3001 job function can issue container approval.  | * add relevant comments into the *comments* field in PEMS or on the inspection record
* **go to Step 9.**
 |
| non-compliant and **not** rectified whilst you are on-site | **continue to Step 7** |

 |
| 7. | * Inform the client that the
* container cannot be loaded in its current state
* in order for the container to be used, it must be reinspected and passed to a consumable level by an AO with the ECI3001 job function.
* Add relevant comments into the *comments* field of the inspection record.
* Remove the inspection sticker (if applicable).
* Revoke the container approval.

| If you are…  | Then... |
| --- | --- |
| using PEMS | * **Refer to** the [Reference: *Plant Export Management System authorised officer user guide*](#_Related_material) and follow the instructions to revoke the container approval in PEMS
* **continue to Step 8.**
 |
| not using PEMS  | * record the revocation of the container approval, including the time, date and reasons in the *comments* field of the inspection record
* strike out the relevant container number line on the empty container inspection record and record in the margin the time, date and reasons for the revocation
* initial the change to the empty container inspection record
* take a copy of the revoked empty container inspection record and provide a copy to the
* client
* [Assessment and Client Contact Group](#_Contact_information_1)
* **continue to Step 8.**
 |

**Note:** a notification must be sent to the client containing the list of one or more revoked container approvals before finalisation of your inspection. This can be to the exporter, a specific employee at the RE, or a general email address for the RE business. |
| 8. | Ask the client if they wish to present an alternative container for loading.

| If... | Then... |
| --- | --- |
| yes | **return to Step 6** and continue the inspection. |
| no  | * add relevant comments into the *comments* field of the inspection record
* **go to** [**Section 13: How do I withdraw the inspection?**](#_Section_13:_How)
 |

 |
| 9. | If the container is present, immediately prior to loading, verify that the condition of the container (internally and externally) has not changed since container approval was issued by:* looking inside the container for pests, residues or contaminants that may infest or contaminate the goods
* inspecting the outside of the container for pests and structural damage that may allow cross-infestation or contamination of the goods.

| If pests, contamination or structural damage are… | Then... |
| --- | --- |
| not observed | **go to** [**Section 6: How do I assess the consignment?**](#_Section_6:_How) |
| observed, but rectified whilst you are on-site(that is, the container has been reinspected and passed to a consumable level prior to the consignment being inspected)**Important:** Onlyan AO with the ECI3001 job function can issue container approval. | * add relevant comments into the *comments* field on the inspection record
* **go to** [**Section 6: How do I assess the consignment?**](#_Section_6:_How)
 |
| observed and **not** rectified whilst you are on-site | **return to Step 7** to revoke the container approval and continue the inspection |

 |

## Inspection procedure

AOs must conduct all inspection tasks in accordance with this work instruction and the policy requirements set out in the guideline and under legislation.

### Section 6: How do I assess the consignment?

The following table outlines how to assess the consignment.

| Step | Action |
| --- | --- |
| 1. | Liaise with the client to identify the consignment to be inspected and ensure it matches the quantity and commodities listed on the RFP.**Note:** If the consignment is to be inspected over multiple AO shifts, then amounts can be less than, but not more than (in total) what is on the RFP.

| If the consignment... | Then... |
| --- | --- |
| matches the RFP | **go to Step 3.** |
| does not match the RFP and is being presented over multiple AO shifts | **go to Step 3.** |
| does not match the RFP | **continue to Step 2.**  |

 |
| 2. | Inform the client that the consignment must match the RFP before the inspection can occur.

| If the client... | Then... |
| --- | --- |
| amends the consignment to match the RFP | **continue to Step 3.**  |
| amends the RFP in EXDOC to match the consignment | * add relevant comments into the *comments* field of the inspection record
* if using PEMS, record a time entry and withdraw the inspection record
* initiate the inspection record with the reloaded RFP information
* **continue to Step 3.**
 |
| does not amend the consignment or the RFP  | * add relevant comments into the *comments* field of the inspection record
* advise the client that you cannot proceed with the inspection
* **go to** [**Section 13: How do I withdraw the inspection?**](#_Section_13:_How)
 |

 |
| 3. | Check that the trade description, if physically applied to the consignment, complies with the policy in the guideline and any specific importing-country requirements listed in Micor.**Important**: * It is not mandatory for packaged goods to have a trade description physically applied (such as labelling) unless stipulated in Micor.
* China oaten hay has a mandatory trade description requirement. Check that there is at least one label on every bale or pack of bales, and that the label details are compliant with China’s requirements as referenced in Attachment 1 of the guideline.

| If the trade description is... | Then... |
| --- | --- |
| compliant | **continue to** [**Section 7: How do I inspect the commodity flowpath?**](#_Section_7:_How) |
| non-compliant but rectified whilst you are on-site | * add relevant comments into the *comments* field of the inspection record
* **continue to** [**Section 7: How do I inspect the commodity flowpath?**](#_Section_7:_How)
 |
| non-compliant and not rectified whilst you are on-site | * inform the client that they need to meet the trade description requirements
* add relevant comments to the *comments* field of the inspection record
* **go to** [**Section 13: How do I withdraw the inspection?**](#_Section_13:_How)
 |
| not on any packages | **continue to** [**Section 7: How do I inspect the commodity flowpath?**](#_Section_7:_How) |

 |

### Section 7: How do I inspect the commodity flowpath?

* The flowpath must be inspected immediately prior to commencement of goods inspection and loading of each consignment.
* The flowpath includes any area a consignment may travel through (or be stored in, following inspection) within the establishment. This may include the processing, storage, treatment, inspection, conveyor and load-out areas.
* The commodity flow path must be clean and free of live pests and contaminants that could infest or contaminate a consignment before (if there is a phytosanitary status), during or after inspection.

The following table outlines how to inspect the commodity flowpath.

| Step | Action |
| --- | --- |
| 1. | Determine the likely flowpath of the goods following sampling and inspection.  |
| 2. | Visually inspect the flowpath to ensure it complies with the policy in the guideline and the product cannot become cross-infested, cross-contaminated or substituted after inspection or during loading.

| If the flowpath is… | Then... |
| --- | --- |
| compliant | * record the flowpath as ‘passed’ and the *time* on the inspection record
* if using PEMS, add a time entry under the *flowpath details* section
* **go to** [**Section 8: How do I sample baled hay, straw and silage?**](#_Section_8:_How)
 |
| non-compliant | * advise the client of the non-compliance
* add relevant comments to the *comments* field of the inspection record
* record the flowpath as ‘failed’ under the *flowpath details* section of the inspection record, including date and time
* **continue to Step 3.**
 |

 |
| 3. | Ask the client if the flowpath non-compliance will be rectified whilst you are on-site.

| If the issues... | Then... |
| --- | --- |
| are rectified whilst you are on-site | * **return to Step 1** and reinspect the flowpath
* **Important:** Where the flowpath has been treated with an insecticide or fumigant, it must not be reinspected until after the safety precautions (including exposure or airing periods) specified on the registered label or treatment certificate have been observed.
* record how and when the issues were rectified in the *comments* field of the inspection record
* record the flowpath as ‘passed after rectification’ under the *flowpath details* section of the inspection record, including date and time
* **continue to** [**Section 8: How do I sample baled hay, straw and silage?**](#_Section_8:_How)
 |
| cannot be rectified whilst you are on-site | * the flowpath fails inspection
* **go to** [**Section 13: How do I withdraw the inspection?**](#_Section_13:_How)
 |

 |

### Section 8: How do I sample baled hay, straw and silage?

Baled hay and straw products must be sampled and inspected either in-line or at end-point.

The following table outlines how to sample baled hay, straw and silage products.

| Step | What happens |
| --- | --- |
| 1. | Identify the container lots to be inspected.

| If the products is… | Then... |
| --- | --- |
| hay or straw | **continue to Step 2.** |
| silage | **go to Step 3.** |

 |
| 2. | Draw the required hay and straw sample.

| If you are sampling… | Then... |
| --- | --- |
| in-line (hay and straw bales)(from the production line, or prior to being loaded into the container) | for all countries including China: * draw bales at random during processing of each container lot
* draw at least two sample bales per container lot for full container load consignments (FCL)
* draw at least two sample bales per consignment for less than container load (LCL) consignments
* **go to Step 4.**
 |
| end-point (hay and straw bales) (after loading into container) | for Japan / Korea and other countries (excluding China): **Important:** Sample bales must be manufactured during processing of each container lot/load.* sample every container
* draw at least one sample bale per container lot for inspection
* brush and collect any lose hay residues from the container doors, walls, seals, floor and surface of visible bales of hay for inspection
* **go to Step 4.**
 |

 |
| 3. | Draw the required sample.

| If you are sampling… | Then... |
| --- | --- |
| in-line (silage) (prior to being loaded into the container) | * sample every container lot
* draw sample bales at random prior to loading of each container lot
* draw at least two samples per container lot
* collect core samples from each sampled bale, ensuring at least a 0.5 kg sample of cores is collected per container lot

**Important:** Core samples must be taken at right angle to the surface.* combine all cores into a single sample per container and mix them thoroughly. The whole sample should be kept intact without subdivision
* **continue to Step 4.**
 |
| end-point (silage)(after loading into container) | * sample every container
* draw at least two core sample per container load for inspection, ensuring at least a 0.5 kg sample of cores is collected per container

**Important:** core samples must be taken at right angle to the surface.* combine all cores into a single sample per container and mix them thoroughly. The whole sample should be kept intact without subdivision
* brush and collect any lose residues from the container doors, walls, seals and floor
* **continue to Step 4.**
 |

 |
| 4. | * Record the sampling rate on the inspection record.
* For PEMS, record the sampling rate as ‘other’ and specify the chosen sampling rate.
 |
| 5. | When the passed goods are not packed immediately into containers at the RE, advise the client that: * the container lots (of processed hay) must be stacked so that safe access can be made to facilitate visual inspection of the consignment
* the RE is responsible for maintaining the phytosanitary status of the goods.
 |
| 6. | Determine the importing country.

| If... | Then... |
| --- | --- |
| China | **continue to Step 7.**  |
| other | **go to** [**Section 9: How do I inspect the sample?**](#_Section_9:_How)  |

 |
| 7.  | **Important:** China oaten hay has a mandatory trade description requirement. * Check that the label is true and accurate.
* Check that there is at least one label on every bale or pack of bales.
* Verify that all bales or packs of bales have been labelled as required by China.

**Note:** The registered establishment must have an approved documented system in place to ensure the labelling meets China’s requirements.

| If the labelling is... | Then... |
| --- | --- |
| compliant | **continue to** [**Section 9: How do I inspect the sample?**](#_Section_9:_How) |
| non-compliant but rectified whilst you are on-site | * add relevant comments into the *comments* field of the inspection record
* **continue to** [**Section 9: How do I inspect the sample?**](#_Section_9:_How)
 |
| non-compliant and not rectified whilst you are on-site | * inform the client that they need to meet the labelling requirements
* add relevant comments to the *comments* field of the inspection record
* **go to** [**Section 13: How do I withdraw the inspection?**](#_Section_13:_How)
 |

 |

### Section 9: How do I inspect the sample?

The following table outlines how to inspect the sample.

| **Step** | **What happens** |
| --- | --- |
| 1. | Identify the sample to be inspected.

| **If the sample is…** | **Then...** |
| --- | --- |
| hay or straw taken in-line  | for all countries including China **continue to Step 2.**  |
| hay or straw taken at end point  | for Japan, Korea and other countries (excluding China) **go to Step 3.**  |
| silage taken in-line | **go to Step 4.**  |
| silage taken at end-point | **go to Step 5.** |

**Important:** * Containers of packed hay must not leave the establishment until all goods that make up the consignment have passed inspection.
* Where inspection has been delayed and containers need to meet a transport schedule, establishments must have a documented process in place (as part of their quality management system) to manage container movement in the event that a container lot fails and requires treatment and re-inspection.Containers mustnot be delivered to the secure port zone until after the container has passed inspection.
* **Refer to** the Guideline: [*Inspecting hay and straw for export*](#_Related_material).
 |
| 2. | **In-line hay or straw** (all countries including China).Using your inspection equipment as required, inspect the sample for pests and contaminants in the designated sample inspection area/inspection bench:* inspect all visible surfaces of the bale
* cut the straps holding the bale in place
* consider that the bale is made up of 10–15 biscuits (or less for smaller bales)
* select 3 biscuits for sampling
* take the biscuits from the bale and inspect all surfaces
* shake the biscuits so they fall apart over the inspection bench/sieve
* remove excess material and examine closely all residues on the bench top/top of sieve, using a magnifying glass where necessary
* brush the residues into the sieve
* shake the sieve for a minimum of 30 seconds to allow the product to move freely across the mesh and for small particles to fall through the sieve and on to the inspection bench
* examine both the top section and lower tray for pests (insects, diseases etc.) and contaminants (weed seeds, soil etc.) for at least one minute.

**Important:** A minimum of three (3) sieve lots per bale is required. **go to** [**Section 10: How do I determine the inspection results?**](#_Section_9:_How) |
| 3. | **End-point hay or straw** (inspection after loading into container) for Japan, Korea and other countries (excluding China).Using your inspection equipment as required, inspect the sample for pests and contaminants in the designated sample inspection area/inspection bench:* inspect all visible surfaces of the bale
* cut the straps holding the bale in place
* consider that the bale is made up of 10–15 biscuits (or less for smaller bales)
* select 3 biscuits for sampling
* take the biscuits from the bale and inspect all surfaces
* shake the biscuits out over the inspection bench/sieve
* examine closely, all residues on the bench top/top of sieve, using a magnifying glass where necessary
* brush the residues into the sieve
* empty the lose hay residues collected from the container door, walls, seals and floor, into the sieve
* shake the sieve for a minimum of 30 seconds to allow the product to move freely across the mesh and for small particles to fall through the sieve and on to the inspection bench.
* examine both the top section and lower tray for pests (insects, diseases etc.) and contaminants (weed seeds, soil etc.) for at least one minute.

**Important:** a minimum of three (3) sieve lots per bale is required.**go to** [**Section 10: How do I determine the inspection results?**](#_Section_9:_How) |
| 4. | **In-line silage**Using your inspection equipment as required, inspect the sample for pests and contaminants in the designated sample inspection area/inspection bench:* visually inspect the sample
* shake the sample out over the inspection bench/sieve
* examine closely, all residues on the bench top/top of sieve, using a magnifying glass where necessary
* brush the residues into the sieve
* shake the sieve for a minimum of 30 seconds to allow the product to move freely across the mesh and for small particles to fall through the sieve and on to the inspection bench
* examine both the top section and lower tray for pests (insects, disease etc.) and contaminants (weed seeds, soil etc.) for at least one minute

**go to** [**Section 10: How do I determine the inspection results?**](#_Section_9:_How) |
| 5. | **End-point silage**Using your inspection equipment as required, inspect the sample for pests and contaminants in the designated sample inspection area/inspection bench:* visually inspect the sample
* shake the sample out over the inspection bench/sieve
* examine closely, all residues on the bench top/top of sieve, using a magnifying glass where necessary
* brush the residues into the sieve
* empty the lose hay residues collected from the container door, walls, seals and floor, into the sieve
* shake the sieve for a minimum of 30 seconds to allow the product to move freely across the mesh and for small particles to fall through the sieve and on to the inspection bench.
* examine both the top section and lower tray for pests (insects, disease etc.) and contaminants (weed seeds, soil etc.) for at least one minute.

**go to** [**Section 10: How do I determine the inspection results?**](#_Section_9:_How) |

### Section 10: How do I determine the inspection results?

The following table outlines how to determine the inspection result.

| Step | Action |
| --- | --- |
| 1. | Record inspection results and relevant comments on the inspection record as you inspect.

| If pests and/or contaminants... | And the importing country... | Then... |
| --- | --- | --- |
| are found | **does** have a pest list  | * **continue to Step 2.**
 |
| are found **above** the tolerances specified in the guideline | **does** **not** have a pest list  | * the container lot fails inspection
* record the number and type of pests/contaminants found in the *remarks* or *comments* field of the inspection record.
* **go to** [**Section 12: How do I fail the inspection?**](#_Section_12:_How)
 |
| * are found **below** the tolerances specified in the guideline

or* no tolerance listed
 | **does** **not** have a pest list  | * the container lot passes inspection
* **go to** [**Section 11: How do I pass the inspection?**](#_Section_11:_How)
 |
| are **not** found  | N/A | * the container lot passes inspection
* **go to** [**Section 11: How do I pass the inspection?**](#_Section_11:_How)
 |

**Note:** There is a nil tolerance for live pests, including rodents and their carcasses unless a tolerance is specified. |
| 2. | Ask the client if they want to have the pest or contaminant identified.

| If the client… | And… | Then… |
| --- | --- | --- |
| wants to have the pest or contaminant identified | you can make an identification within your training and knowledge | **go to Step 6.**  |
| wants to have the pest or contaminant identified | you cannot make an identification | **continue to Step 3.** |
| does not want to have the pest or contaminant identified  | N/A | * the container lot/consignment fails inspection
* record the number and type of pests/contaminants found in the *remarks* or *comments* field of the inspection record
* **go to** [**Section 12: How do I fail the inspection?**](#_Section_12:_How)
 |

 |
| 3. | Secure and collect the pest or contaminant for identification.**Note**:* Attempt to collect the specimen without damaging it.
* If collection without damage is not possible, the specimen should be collected still in, or on, the substrate in which it was found.
* If the specimen is left on the commodity, mark the sample in some way to assist the diagnostician in finding it if applicable.
* Photograph, and provide to diagnostician.
* For more information on how to prepare a specimen for identification see the Reference: [*Plant exports guide—specimen collection*](#_Related_material)*.*
 |
| 4. | Label the specimen with the following information written in pencil:* date and time
* the RFP number followed by a, b, c etc. (depending on the number of samples submitted for that consignment)
* the registered establishment number the inspection was done at
* your name, AO number and signature
* if the pest is alive
* any known treatments that have been applied to the goods.
 |
| 5. | Ask the client if they want the inspection to be completed whilst the result of pest identification is pending.

| If the client… | **Then…** |
| --- | --- |
| wants the inspection completed  | * complete the inspection
* if using PEMS, do not submit
* **continue to Step 6.**
 |
| wants the inspection put on hold | * if using PEMS, leave the inspection active with comments and exit PEMS

**Note:** Inspection results will be saved automatically to return to at a later stage.* ask the client to secure the remaining containers
* **continue to Step 6.**
 |

 |
| 6. | Once the pest or contaminant has been identified: * record the number and type of pests/contaminants found in the *remarks* or *comments* field of the inspection record
* compare it against the importing country’s pest and/or contaminants list.

| If pest and/or contaminant... | And… | Then... |
| --- | --- | --- |
| * **does not** exceed tolerance levels

or* is not listed in tolerance tables of the guideline
 | the inspection **has** been completed | * the container lot/consignment passes inspection
* **continue to** [**Section 11: How do I pass the inspection?**](#_Section_11:_How)
 |
| **does not** exceed tolerance levels  | the inspection **has** **not** been completed | * **Return to Step 1** [**Section 8: How do I sample baled hay, straw and silage?**](#_Section_8:_How)to complete the inspection.

**Important:** Where a day or more has passed since the start of the inspection, repeat Sections 4 to 7 before going to [**Section 8: How do I sample baled hay, straw and silage?**](#_Section_8:_How)   |
| **exceeds** tolerance levels | N/A | * the container lot/consignment fails inspection
* **go to** [**Section 12: How do I fail the inspection?**](#_Section_12:_How)
 |

 |

## Passing, failing and withdrawing the inspection

### Section 11: How do I pass the inspection?

The following table outlines how to pass the inspection.

| Step | Action |
| --- | --- |
| 1. | Record the passed inspection result on the inspection record.

| If you are… | Then... |
| --- | --- |
| using PEMS | * add a time entry for your inspection activities
* **continue to Step 2.**
 |
| not using PEMS | * record your finish time on the inspection record
* **continue to Step 2.**
 |

 |
| 2. | Complete the remaining fields as per the Work Instruction: [*Completing plant export inspection and treatment records*](#_Related_material). |
| 3.  | Advise the client that the consignment has passed inspection and is export compliant.  |
| 4. | Submit the inspection record and supporting documents.**Important:** One inspection record must be submitted for each 24-hour period. It is acceptable if the inspection record period extends over midnight to account for shifts.

| If you are… | Then… |
| --- | --- |
| using PEMS | * download and print, or email, a copy of the inspection record to the client (if they request it)
* ensure the inspection record is checked in
* submit an inspection record daily
* **continue to Step 5.**
 |
| not using PEMS  | * provide a copy to the client
* send a copy to the documentation hub along with any supporting documents at [Assessment and Client Contact Group](#_Contact_information)
* keep the original and copies of the supporting documents for audit purposes for a minimum of two years
* **continue to Step 5.**
 |

 |
| 5. | * For departmental AOs, invoice the client as per the Work Instruction: [*Invoicing plant export clients*](#_Related_material).
* If you used PEMS, record the relevant invoice number under the *time entry* tab of the RFP record.
* **Do not continue end of inspection.**
 |

### Section 12: How do I fail the inspection?

The following table outlines how to fail the inspection.

| Step | Action  |
| --- | --- |
| 1. | Advise the client of the failure and the reasons why.

| If the sample… | Then… |
| --- | --- |
| cannot be linked to an individual container lot | * the entire consignment fails
* **continue to Step 2.**
 |
| can be linked to an individual container lot | * the container lot being processed/packed fails
* **continue to Step 2.**
 |

 |
| 2. | Determine the type of sampling used.

| If using… | Then... |
| --- | --- |
| inline sampling  | * pass product already packed and previously sampled, inspected and passed, which has been loaded and containers have been sealed
* reject product
* part-packed or intended to be packed within the container lot sampled
* on the processing line is rejected
* in the container lot that has not yet been processed is rejected
* **continue to Step 3.**
 |
| end-point sampling  | * reject all bales from that container lot
* **continue to Step 3.**
 |

 |
| 3. | Advise the client that: * failed product must be segregated and clearly distinguished from product that passed inspection or has not been inspected
* rejected product can be treated and resubmitted for inspection.
 |
| 4. | * Record the failed inspection result on the inspection record.
* Record the number of type of pests/contaminants found in the *remarks* or *comments* field of the inspection record.
* Complete the remaining fields as per the Work Instruction: [*Completing plant export inspection and treatment records*](#_Related_material)*.*
 |
| 5. | Ask the client if they intend to treat the rejected container lot/consignment.

| If... | Then... |
| --- | --- |
| yes | * advise the client that the requirements for treating and resubmitting consignments can be found in the guideline
* **continue to Step 6.**
 |
| no | **continue to Step 6.** |

**Note:** Treatment offailed consignments is the responsibility of the client. The requirements for treatment are in the guideline and the Plant Rules. |
| 6. | Submit the inspection record and supporting documents.

| If you are using... | Then... |
| --- | --- |
| PEMS | * add a time entry for your inspection activities
* ensure the inspection record is checked in and then submit
* if requested, download and print, or email, a copy to the client
* **continue to Step 7.**
 |
| manual inspection record | * record your finish time and date on the inspection record
* provide a copy to the client
* send a copy to the documentation hub along with any supporting documents at [Assessment and Client Contact Group](#_Contact_information)
* keep the original and copies of supporting documents for audit purposes for a minimum of 2 years
* **continue to Step 7.**
 |

 |
| 7. | * For departmental AOs, invoice the client as per the Work Instruction: [*Invoicing plant export clients*](#_Related_material)*.*
* If you used PEMS, record the relevant invoice number under the time entry tab of the RFP record.
* **Do not continue, end of inspection.**
 |

### Section 13: How do I withdraw the inspection?

The following table outlines how to withdraw the inspection.

| **Step** | **Action** |
| --- | --- |
| 1. | Advise the client that the inspection has been withdrawn and the reasons why. |
| 2. | Record the withdrawal on the inspection record.

| If you are... | Then... |
| --- | --- |
| using PEMS | * select *withdraw*
* add a time entry for your inspection activities
* **continue to Step 3.**
 |
| not using PEMS | * record ‘withdrawn*’* in the *comments* field
* record your finish time on the manual inspection record and complete the remaining fields
* **continue to Step 3.**
 |

 |
| 3. | Submit the inspection record and supporting documents.

| If you are... | Then... |
| --- | --- |
| using PEMS | if requested, download and print, or email a copy to the client.  |
| not using PEMS | * provide a copy to the client
* send a copy to the documentation hub along with any supporting documents at [Assessment and Client Contact Group](#_Contact_information)
* keep the original for audit purposes for a minimum of two years.
 |

 |
| 4. | * For departmental AOs, invoice the client as per the Work Instruction: [*Invoicing plant export clients*](#_Related_material).
* If you used PEMS, record the relevant invoice number under the time entry tab of the RFP record.
* **Do not continue, end of inspection.**
 |

## Inspecting resubmitted goods

### Section 14: How do I inspect a resubmitted consignment?

The following table outlines how to inspect a resubmitted consignment.

| Step | Action |
| --- | --- |
| 1. | Prior to inspecting a resubmitted consignment, ensure that:* the client has submitted a new RFP (if the composition of the consignment has changed) along with a copy of the original RFP and original inspection record
* the client has provided written notification that the consignment previously failed inspection and the method of treatment applied
* when applicable, the client has provided evidence that the treatment applied has treated the pest/s or contaminants found.

**Important:** Evidence of treatment effectiveness against a pest would only be required if an AO or the department had reason to believe that the chosen treatment did not address the biosecurity risk found in the consignment. |
| 2. | * Record the method of treatment in the *comments* or *remarks* field of the inspection record.
* Have the goods been treated with a fumigant, or chemical treatment?

|  |  |
| --- | --- |
| If… | Then… |
| yes | * take a copy of the treatment certificate for upload into PEMS
* check that the certificate is valid as per the Guideline: [*Supporting documents for plant exports*](#_Related_material)
* for fumigations, look at the gas-free certificate to determine the date and time of gas clearance (that is, to ensure that any exposure, airing periods and safety precautions have been completed)
* take a copy of the gas-free certificate for upload into PEMS
* **continue to Step 3.**
 |
| no | **continue to Step 3.** |

 |
| 3. | Inspect the resubmitted consignment in accordance with this work instruction starting from [Section 1](#_Section_1:_How).**Important:** You must use the end-point sampling method if the consignment has been treated in the container. |

## Related material

The following related material is available on the department’s website:

* Manual of Importing Country Requirements ([Micor](https://micor.agriculture.gov.au/Plants/pages/default.aspx))
* [Plant Export Operations Manual](https://www.agriculture.gov.au/export/controlled-goods/plants-plant-products/plantexportsmanual)
* Guideline: *Inspection of hay and straw for export*
* Guideline: *Supporting documents for plant exports*
* Work Instruction: *Inspecting bagged chaff and hay for export*
* Work Instruction: *Inspecting loose hay and straw for export in-line*
* Work instruction: *Completing plant export inspection and treatment records*
* Reference: *Grain and plant product inspection record*
* Reference: *Plant Export Management System Authorised Officer user guide*
* Reference: *Plant exports guide – Equipment*
* Reference: *Plant exports guide – Specimen collection*
* Reference: *Inspection technique guide – Hay and Straw.*

The following related material is available on the [Instructional Material Library](http://iml.agdaff.gov.au/Pages/Home.aspx) for departmental AOs:

* Work Instruction: *Invoicing plant export clients*
* Work health and safety.

## Contact information

* Authorised Officer Hotline: 1800 851 305
* Authorised Officer Program: PlantExportTraining@aff.gov.au
* Grain and Seed Exports Program: Grain.Export@aff.gov.au
* Grain and Seed Exports Program hotline: 02 6272 3229
* Assessment and Client Contact Group: PlantExportsNDH@aff.gov.au
* Micor administrator: micorplants@aff.gov.au

## Document information

The following table contains administrative metadata.

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| IMLS-9-7080 | Director, Grain and Seed Exports |

## Version history

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

| Version | Date | Amendment details |
| --- | --- | --- |
| 1 | 5/08/2020 | First publication of this work instruction.  |
| 2 | 27/03/2021 | Updates to reflect the commencement of the *Export Control Act 2020* and associated Plant Rules. |