



# GUIDELINE

## Inspection of cotton for export

### 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.

### Direction to industry

This guideline outlines the requirements for the inspection of cotton for export. All parties with roles and responsibilities explicit in this guideline and legislation must comply with it.

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### Summary of main points

This document outlines the policy and process for the inspection of cotton to enable export certification. It includes:

- pre-inspection requirements
- registered establishment requirements
- inspection requirements
- sampling requirements
- pest identification and tolerances
- pass and failure principles
- treatment requirements
- post-inspection requirements
- exporting goods not of Australian origin
- re-exporting goods.

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## Purpose of this document

This guideline details the policy and process for the phytosanitary inspection of cotton for export. It includes the following:

- raw baled cotton
- mote baled cotton
- cotton modules/unprocessed cotton.

**Important:** This document is to be used in conjunction with the importing country's requirements (ICRs) listed in import permits, protocols, workplans and the Manual of Importing Country Requirements ([Micor](#)).

Where the ICRs contradict the requirements in this document, the ICRs take precedence.

## Definitions

The following table defines terms used in this document.

Term	Definition
Authorised officer (AO)	<p>A person authorised under section 291 of the <i>Export Control Act 2020</i> to be an authorised officer. The authorised officer may exercise powers and functions conferred on them through an instrument of appointment.</p> <p><b>Note:</b> An authorised officer may be a Commonwealth, State or Territory government officer or third-party individual. Examples of third-party individuals include, but are not limited to:</p> <ul style="list-style-type: none"><li>• employees of registered establishments</li><li>• employees of an exporter</li><li>• self-employed individuals/sole traders.</li></ul>
Bulk goods/bulk commodities	Unpackaged goods, that are generally sold or traded in large quantities and are loaded directly into a shipping container or vessel hold.
Bulk into ship hold inspection record	<p>The approved form for an authorised officer to record the findings and result of an inspection of bulk prescribed grain and plant products for export in or on a bulk vessel.</p> <p><b>Note:</b> The bulk into ship hold inspection record includes PEMS or the equivalent manual record available on the PEOM.</p>
Bulk vessel	A vessel that is designed to be used to transport prescribed plants or plant products in bulk from Australia to an overseas destination.
Bulk vessel approval	<p>An approval of the bulk vessel for loading, that is in force (has not expired or been revoked) under part 5 of Chapter 9 of the Export Control (Plants and Plant Products) Rules 2021.</p> <p><b>Note:</b> The bulk vessel approval is documented through a bulk vessel inspection record.</p>

Term	Definition
Bulk vessel inspection record	<p>The approved form on which an authorised officer records bulk vessel inspection details and results, including whether a cargo space (such as a hold) in or on a bulk vessel, is approved for loading, or has failed inspection.</p> <p><b>Note:</b> The bulk vessel inspection record includes PEMS or the equivalent manual record available on the PEOM.</p>
Bulk vessel loading running record	<p>The approved form on which an authorised officer records inspection activity or issues as they arise (hold changes, stoppages, weed seeds, AO changes and the like) during loading of a bulk vessel.</p> <p><b>Note:</b> The bulk vessel loading running record is available on the PEOM.</p>
Certification	<p>Means a government certificate issued under chapter 2 of the <i>Export Control Act 2020</i> in relation to goods that are to be, or that have been, exported. This may include:</p> <p>Official certificates, electronic or manual, issued by the department to endorse that plants and plant products for export are compliant with departmental and the importing country's requirements.</p> <p><b>Note:</b> An export permit is a departmental requirement. All other export certification is an importing country requirement.</p>
Client	The exporter, exporter's representative or person responsible for prescribed goods intended for export.
Commodity	<p>A type of plant or plant product being moved for trade or other purpose.</p> <p><b>Note:</b> 'Product' and 'goods' are also used interchangeably with the term commodity.</p>
Compliant goods	<p>Goods that have been prepared (by clients/parties responsible) and determined compliant with:</p> <ul style="list-style-type: none"> <li>• relevant importing country requirements</li> <li>• relevant conditions or restrictions prescribed under the <i>Export Control Act 2020</i></li> <li>• departmental requirements</li> </ul> <p>prior to being presented to the AO for inspection.</p> <p>The clients/parties responsible for the goods must present goods that will meet the above requirements. Participants in the export supply chain involved in the preparation of prescribed goods (particularly the ERE) must knowingly present 'compliant goods' to the AO for inspection, as required under the <i>Export Control Act 2020</i>.</p>
Consignment	<p>The quantity of plants or plant products identified on the notice of intention to export (NOI), or request for permit (RFP), for export to a particular importing country.</p> <p>Can be composed of one or more commodities. May be presented in lots and may not be presented all at the same time.</p>

Term	Definition
Container	A container for prescribed goods that is designed for use as a unit of cargo handling equipment in the export of the goods by aircraft or ship, including a shipping container and air cargo container.
Container approval	An approval of the empty container that is in force (has not expired or been revoked) under part 6 of chapter 9 of the Export Control (Plant and Plant Product) Rules 2021.  <b>Note:</b> The container approval is documented through a passed result recorded on the container inspection record.
Empty container inspection record	The approved form on which an authorised officer records container inspection details and results, including whether a container is approved for loading, or failed inspection.  <b>Note:</b> The container inspection record includes PEMS or the manual equivalent available on the PEOM.
Contaminant	Any foreign matter, whether organic or inorganic, that is included in, on, or with prescribed goods, and can include ergot, cereal, smut, earth (sand and soil etc.), live non-injurious pests, weed seeds, leaves, stems, odour, pickling compounds, artificial colouring and other extraneous material.
Cotton gin (gin)	A machine that separates cotton fibre from cotton seed.
Cotton module	The compressed cotton bale; not yet ginned or processed.  <b>Note:</b> May also be referred to as 'unprocessed cotton'.
Country of origin	Country where the plants or plant product derivatives were grown, produced, or exposed to infestation by pests or contaminants.
Export documentation system (EXDOC)	The department's electronic export documentation system in which export certification is produced. This includes export permits and phytosanitary certificates.
Exporter	The entity identified as the exporter in a Notice of Intention/Request for Permit to export.
Export permit	A permit issued by the department under chapter 7 of the <i>Export Control Act 2020</i> and required under the Export Control (Plants and Plant Product) Rules 2021 for the lawful export of prescribed plants and plant products.
Flowpath	The point of sampling to the point of loading. The flowpath includes the inspection area and commodity conveyance systems and anything along the pathway that the product comes into contact with, or which presents a direct risk for the product to become cross-contaminated after inspection and during loading. For non-bulk commodities, this may include the receipt, storage, treatment, inspection, conveyor systems and despatch areas.
Ginning	The process of separating cotton fibre from the cotton seed.

Term	Definition
Grain and plant products inspection record	The approved form (inspection record) for an authorised officer to record the findings and result of an inspection of prescribed grain and plant products (including cotton) for export.  <b>Note:</b> The grain and plant products inspection record includes PEMS and the equivalent manual record available on the PEOM.
Hold	Internal compartment where cargo can be stowed and carried. Generally referred to as a 'ship's hold'.
Import permit	A document issued by a national government authorising the importation of certain goods into its territory.
Infestation	Presence of a living pest of the plant or plant product concerned.  <b>Note:</b> Infestation includes infection.
Infestible residue or infestible material	Any residue or material that is susceptible to infestation by pests or could harbour pests.
Inspection authorised officer (AO)	An AO approved to inspect plants, plant products, empty containers or empty bulk vessels for export or supervise phytosanitary treatments.  <b>Note:</b> This role can be performed by departmental and State/Territory government officer or third-party AOs.
Inspection record	The approved form for an authorised officer to record the findings and result of an inspection of plants and plant products for export.
Lot	Units of a single commodity, identifiable by its homogeneity of composition and origin.
Lint	The cotton fibre obtained by the ginning process once the cotton seed, leaves and bol casings have been removed.
Manual of Importing Country Requirements (Micor)	A database maintained by the department that outlines importing country requirements for a range of plants and plant products for export.
Mote cotton	A by-product of the ginned cotton; small, broken or immature seeds with attached fibres. May also be referred to as 'gin motes'
National Plant Protection Organisation (NPPO)	Official service established by a government to discharge the functions specified by the International Plant Protection Convention.  The department is the Australian Government's nominated NPPO.
Notice of Intention (NOI)	The approved form submitted by an exporter to the department containing information about goods they intend to export.  <b>Note:</b> For contingency purposes a manual NOI, called an EX28, can be used. An electronic NOI is called a Request for Permit (RFP) and is submitted through the department's electronic documentation system, EXDOC.

Term	Definition
Package	The outermost box/bag that a commodity is packed into. For example, a tray, carton, bag, bulka bag, or bin, as presented at inspection. Any covering in which plants or plant products are packed and are intended to be exported.
Plant Exports Management System (PEMS)	The department's electronic system which contains records of the findings and results of phytosanitary inspections of plants and plant products, empty containers and ship holds used for export.
Plant Export Operations Manual (PEOM)	A webpage maintained by the department that outlines the policy and processes for exporting plants and plant products from Australia. It also lists instructional material, forms and user guides related to the export certification process.
Pest	Any species, strain, or biotype of plant, animal or pathogenic agent, that is injurious to plants or plant products.
Phytosanitary	Relates to the health of plants or plant products, especially with respect to the requirements of international trade.
Phytosanitary status	Goods having passed AO inspection and certification requirements are considered to be 'passed as export compliant'—and have attained a phytosanitary status recognised by the department. Attaining phytosanitary status confirms compliance with phytosanitary requirements of the department and/or the importing country.
Prescribed goods (goods)	Goods that are listed in the Export Control Rules to be prescribed goods for the purposes of the <i>Export Control Act 2020</i> . This includes: <ul style="list-style-type: none"> <li>a) prescribed grains</li> <li>b) hay and straw</li> <li>c) fresh fruit</li> <li>d) fresh vegetables</li> <li>e) other plants or plant products for which a phytosanitary certificate or any other official certificate is required by an importing country authority.</li> </ul>
Protocol	A government-to-government document that specifies import requirements. The protocol is bilaterally agreed to by Australia and the importing country authority.  <b>Note:</b> Countries that Australia has an agreed protocol with, are referred to as 'protocol markets'. For a list of protocol markets go to 'view documents' in Micor plants.
Raw cotton	Cotton fibres that are removed from the cotton seed by the gin; this is the main product from the gin. The by-products of the gin are cotton seed and mote cotton.
Registered establishment	An establishment that is registered under chapter 4 of the <i>Export Control Act 2020</i> for a kind of export operations in relation to a kind of prescribed plants or plant products.



Term	Definition
Reginned cotton	Cotton that has passed through the ginning process more than once and has also already been baled. It may go through the ginning again for additional cleaning, blending or the removal of foreign material.
Seed Cotton	Unginned, picked cotton.
Supporting documents	Documents provided by the client as evidence that goods are compliant with departmental and importing country requirements. For example, grower declarations, area freedom statements and treatment certificates.
Total ship load	The total tonnage expected to be loaded onto the ship (as per all RFP/s).
Treatment	Official procedure for the killing, inactivation or removal of pests, or for rendering pests infertile or for devitalisation.
Unit	An individual item that is considered to represent a single item of the good for the purposes of sampling and inspection, for example: 1 cotton bale.

## Legislative framework

The following list outlines the legislation that applies to the phytosanitary inspection of cotton for export.

- *Export Control Act 2020* and Export Control (Plants and Plant Products) Rules 2021 (Plant Rules)
  - Section 2-1 Plant Rules – Plant and plant products that are prescribed goods
  - Section 2-3 and 2-4 Plant Rules – Prohibited export and prescribed export conditions
  - Section 4-12 Plant Rules – Prescribed plants or plant products intended to be exported in a bulk vessel
  - Section 4-13 Plant Rules – Prescribed plants or plant products intended to be exported in containers
  - Part 1 of Chapter 8 – Notice of intention to export
  - Part 2 of Chapter 8 – Trade descriptions
  - Part 2 of Chapter 9 – Assessments of goods
  - Section 410 Act – Methods for taking, testing and analysing certain samples
  - Section 9-11 Plant Rules – Reassessment after failed assessment
  - Section 4-11 Plant Rules – Requirements for packaging for export
  - Part 5 of Chapter 9 Plant Rules – Bulk vessel approvals
  - Part 6 of Chapter 9 Plant Rules – Container approvals
  - Part 1 of Chapter 11 – Records
- Export Control (Fees and Payments) Rules 2021
- *Privacy Act 1988*
- *Public Service Act 1999*
- *Work Health and Safety Act 2011.*

## Roles and responsibilities

The following table outlines the roles and responsibilities undertaken in this guideline.

Role	Responsibility
Clients	<ul style="list-style-type: none"><li>• Obtaining, checking and meeting the importing country requirements.</li><li>• Submitting the RFP and supporting documents.</li><li>• Requesting an export inspection.</li><li>• Presenting compliant goods for export. Presenting goods that are compliant with importing country requirements and requirements of Australian export legislation (compliant goods) for inspection/assessment by the AO.</li><li>• Using compliant packaging.</li><li>• Organising and presenting the consignment for inspection in a registered establishment.</li><li>• Applying an accurate trade description to the consignment.</li><li>• Selecting the sampling method.</li><li>• Providing facilities and assistance to the AO during inspection.</li><li>• Providing information on pest lists to the AO, where applicable.</li><li>• Obtaining formal identification of pests detected during inspection, where applicable.</li><li>• Treating rejected consignments and requesting re-inspection where applicable.</li><li>• Requesting certification.</li><li>• Maintaining phytosanitary status of goods until export.</li><li>• Exporting goods within the export validity period.</li><li>• Requesting an extension to the export validity period, where applicable.</li></ul>

Role	Responsibility
Inspection AOs	<ul style="list-style-type: none"> <li>• Ensuring they have the appropriate job functions, delegations and powers listed in their Instrument of Appointment to undertake the inspection.</li> <li>• Determining and complying with site-specific work health and safety (WHS) requirements.</li> <li>• Assessing WHS risks.</li> <li>• Reporting WHS incidents.</li> <li>• Validating RFP and supporting documents.</li> <li>• Checking the consignment matches the RFP.</li> <li>• Checking the consignment matches the trade description.</li> <li>• Inspecting and verifying compliance of packaging material.</li> <li>• Verifying that empty containers and bulk vessels have been approved for loading, where applicable.</li> <li>• Inspecting commodity flowpath.</li> <li>• Checking the consignment is accessible.</li> <li>• Sampling the consignment.</li> <li>• Conducting phytosanitary inspection.</li> <li>• Collecting pests and contaminants for identification.</li> <li>• Re-inspecting the consignment after treatment, where applicable.</li> <li>• Recording and submitting inspection results.</li> </ul>
Assessment and Client Contact Group	<ul style="list-style-type: none"> <li>• Validating documentation.</li> <li>• Issuing certification.</li> </ul>
Grain and Seed Exports Program	Assessing requests for extensions to the export validity period.
Business Systems Program	Updating EXDOC.
Occupiers of registered establishments (see also Clients roles)	<ul style="list-style-type: none"> <li>• Presenting goods that are compliant with importing country requirements and requirements of Australian export legislation (compliant goods) for inspection/assessment by the AO.</li> <li>• Maintaining the phytosanitary status of goods until export.</li> <li>• Maintaining the establishment in accordance with relevant legislation and the Guideline: <a href="#">Management of plant export registered establishments</a>.</li> </ul>
Micor administrator	Creating or amending Micor cases as required.

## Inspection by an AO

- Cotton must be inspected by an AO that has been appropriately trained, deemed competent and appointed by the department for the job function RBC3001 *Export inspection of raw baled cotton*.
- Inspection of cotton must be carried out in accordance with the Work instruction: [Inspecting cotton for export](#).

- Inspection AOs must hold current registration for operating all vehicles, vessels, equipment and machinery as required.
- Inspections must be recorded on an approved inspection record in accordance with the Work Instruction: [Completing plant export inspection and treatment records](#).

## Work health and safety

- Clients and occupiers of registered establishments should comply with the work health and safety (WHS) policies of their organisation during the packing, treatment and movement of goods.
- Inspection AOs must
  - read and be familiar with the Reference: [Work health and safety in the plant export environment](#).
  - not enter work sites unless it is safe, they are wearing the required personal protective equipment (PPE) and have considered any WHS hazards
  - discontinue their inspection if, at any time, they consider there is a risk to their safety
  - comply with applicable Commonwealth, state and territory WHS legislation
  - comply with site-specific requirements, unless they assess the requirements as placing them at risk, in which case they must take reasonable action to ensure their safety
  - continually assess the possible risks while performing their duties.

## Personal protective equipment

Inspection AOs must have the following PPE for when a site or work instruction requires it:

- hi-visibility vest
- enclosed shoes
- steel-cap boots
- hearing protection
- hard hat
- long-sleeved clothing
- safety glasses
- face mask
- first aid kit
- water
- sunscreen
- emergency communication equipment (such as a phone carrier with coverage or satellite phone).

## Care and maintenance of equipment

Inspection AOs must:

- maintain, store and use their PPE in accordance with the manufacturer's instructions and any relevant Australian Standard and requirements of the AO's employer
- regularly inspect the PPE and inspection equipment and remove from service if the PPE and/or inspection equipment is damaged, broken or passed its use-by date.

**Go to** the Reference: [Plant exports guide – Equipment](#) for more information on the types of PPE needed for inspections.

## WHS reporting requirements

All WHS incidents, near misses, and any hazards must be reported to the department, the occupier of the registered establishment and the client.

- Departmental AOs must record all WHS incidents, near misses, and any hazards in Aurion.
- State/Territory government officer or third-party AOs must report all WHS incidents, near misses, and any hazards to [Plant Export Training](#).

## Essential inspection equipment

Inspection AOs must:

- have the minimum equipment as outlined in the relevant work instruction
- ensure equipment is in good order, clean and fit for purpose
- always carry their departmental identity cards (department AOs only).

**Go to the Reference:** [Plant exports guide – Equipment](#) for more information on essential inspection equipment.

## What are the pre-inspection requirements?

### Import requirements

Where the importing country requirements are unknown or differ to [Micor](#), they must be:

- obtained from the importing country authority
- obtained in the form of an import permit or instrument in writing published by the importing country authority; for example, legislation, regulation, decree or import requirements database
- provided to the [Micor Administrator](#) and published/updated in [Micor](#) prior to inspection.

### Notice of intention to export requirements

A valid NOI must be:

- lodged prior to inspection
- consistent with the consignment presented for inspection
- in the form of an electronic RFP lodged via EXDOC
- at initial (INIT) or final (FINL) status prior to engaging an AO for inspection
- a manual EX28 form, if the importing country authority requires manual certification or contingency measures are in place due to electronic systems failures.

The following table outlines the pre-inspection process.

Stage	What happens	Responsible party								
1.	The import requirements are obtained from the importing country authority.	Client								
2.	<table><tr><td colspan="2">The import requirements are checked to make sure they match the relevant <a href="#">Micor</a> case.</td></tr><tr><th>If the conditions...</th><th>Then...</th></tr><tr><td>do match the Micor case</td><td><b>go to Stage 4.</b></td></tr><tr><td>do not match the Micor case, or there is no Micor case</td><td><ul style="list-style-type: none"><li>the requirements are provided to the department</li><li><b>continue to Stage 3.</b></li></ul></td></tr></table>	The import requirements are checked to make sure they match the relevant <a href="#">Micor</a> case.		If the conditions...	Then...	do match the Micor case	<b>go to Stage 4.</b>	do not match the Micor case, or there is no Micor case	<ul style="list-style-type: none"><li>the requirements are provided to the department</li><li><b>continue to Stage 3.</b></li></ul>	Client
The import requirements are checked to make sure they match the relevant <a href="#">Micor</a> case.										
If the conditions...	Then...									
do match the Micor case	<b>go to Stage 4.</b>									
do not match the Micor case, or there is no Micor case	<ul style="list-style-type: none"><li>the requirements are provided to the department</li><li><b>continue to Stage 3.</b></li></ul>									

Stage	What happens	Responsible party
3.	The import requirements are assessed, and a Micor case is created or amended as required.	Micor administrator
4.	An export registered establishment, approved for the commodity, is organised for the inspection.	Client
5.	An RFP is lodged for the consignment to be exported.	Client
6.	The consignment is prepared and checked to make sure it meets departmental and the importing country's requirements.	Client
7.	An inspection AO is organised for the inspection.	Client
8.	The inspection AO is provided with a copy of the RFP and all supporting documentation, such as an import permit, gas free certificates, evidence of area freedom or treatment certificates, container or bulk vessel inspection records.  <b>Note:</b> Some documents may be provided after the inspection.	Client

**Go to** the Guideline: [Issuance of certification for plant exports](#) for more information about preparing products for export, booking an inspection appointment and submitting supporting documentation.

## What are the registered establishment requirements?

### General requirements

Prescribed goods must be prepared and presented for inspection at an establishment registered for export with the department.

A registered establishment must:

- be maintained in accordance with Guideline: [Management of plant export registered establishments and any relevant legislative requirements](#)
- have a current registration and approved export operations relevant to the commodity
- have receipt, storage, inspection, treatment and despatch areas clean and free from pests and contaminants
- where an inspection bench is required it must be
  - well-lit, lighting can be natural or artificial
  - clean
  - white (if using stainless steel, the bench must be covered with suitable white material prior to each inspection or a white inspection tray)
  - fit-for-purpose (that is, of adequate size and nature to allow for the inspection)
  - not used for the inspection of imported goods unless departmental approval has been given by the [Audit and Assurance Group](#).

For approval to undertake bulk into vessel loading operations, the occupier of a registered establishment must submit a loading proposal and standard operating procedure (SOP) to the [Grain and Seed Exports Program](#).

**Note:** For more information on how to apply, contact the [Grain and Seed Exports Program](#).

## Sampling systems

Sampling points must allow the AO to safely and efficiently take required samples.

## Commodity flowpath requirements

The flowpath is defined as from the point of sampling to the point of loading and includes the inspection area and commodity conveyance systems and anything along the pathway which the product comes into contact with, or which presents a direct risk for the product to become cross-contaminated or infested after inspection and during loading.

- The commodity flowpath must be clean, well-lit and free of live pests and contaminants that could infest or contaminate a consignment before, during or after inspection, including:
  - infested/infestible material or residue
  - live insects
  - live vermin, carcasses or their waste
  - contaminants.
- The flowpath must be inspected and passed immediately prior to inspection and loading.
- Where loading of containers is continuous (back-to-back) throughout a shift and involves packing the same commodity for multiple RFPs, the flowpath inspection can be conducted at the beginning of the day.
- The flowpath must be reinspected if there is a change in condition that presents a risk of contamination or cross contamination to the goods/flowpath during loading.
- Where the flowpath has been treated with an insecticide or fumigant, AOs must not re-inspect until after the safety precautions (including exposure or airing periods) specified on the registered label or treatment certificate have been observed.
- If a non-conforming flowpath is rectified at the time, it must be re-inspected and passed. If the flowpath cannot be rectified, the inspection must be recorded as failed.
- The occupier of an export registered establishment must maintain a documented hygiene and pest control program to ensure that areas surrounding the flowpath are free of pests and contamination.

**Note:** It is not always practical to complete the whole flowpath inspection (point of sampling and storage to loading) due to containers not being on site. In this situation, the flowpath inspection is solely the inspection and sampling areas and it is up to the client to ensure phytosanitary status is maintained when the passed goods are to be loaded into their respective containers.

## What are the requirements for empty containers and/or bulk vessels?

Prior to loading, the condition of the empty containers or bulk vessel must be verified:

- empty containers must have been issued a container approval that has not expired (is within 90 days of inspection and approval) and has not been revoked
- bulk vessels must have been issued a bulk vessel approval that has not expired (is within 28 days of inspection) and the approval has not been suspended or revoked.

## What are the consignment requirements?

### Access to the consignment

The consignment must:

- be clearly identifiable
- accessible

- match the RFP.

**Important:** The consignment may be presented in 'lots' over a number of shifts or days and may not be presented all at the same time. The AO is required to verify what is presented against the details of the RFP. Amounts can be less than, but not more than what is on the RFP.

## Lot size

The maximum size of a lot must be:

- no greater than 116 bales  
or
- no more than the amount that can be loaded into a 40-foot shipping container  
or
- for bulk vessels, refer to the bulk loading standard operating procedure.

## Trade description

The trade description must be accurate and unambiguous and meet the requirements of the *Export Control Act 2020* and the Plant Rules.

Trade description requirements are met through the provision of accurate and unambiguous (true and correct) information relating to the consignment when lodging the RFP into EXDOC.

If a trade description has been physically applied (such as through labelling or printed markings on packaging) an AO must verify that the trade description:

- is accurate and unambiguous and that it contains enough information to enable the goods to be correctly and readily identified, and not confused with any other product
- is clear, set out in prominent and legible characters, and not obscured in any way
- has been securely attached to the packaging
- satisfies any importing country requirements.

## Packaging material

Materials used as packaging for cotton for export must be:

- new (or, if used, must be treated/cleaned before use to ensure it meets all other packaging requirements)
- clean
- appropriate for the plants or plant products that have been or will be packed in them
- sufficiently strong to withstand the handling ordinarily incurred by the materials during transit to maintain the phytosanitary status of the consignment
- used in a manner that will ensure the integrity of the cotton packed into them, including:
  - free from holes/rips/tears
  - free from pests and contaminants
  - unlikely to impart odour
  - that is unlikely to place the acceptability of the goods at risk
- compliant with any specific importing country requirements
- compliant with the [International Standards for Phytosanitary Measures \(ISPM\) 15](#) for wood packaging material.

## How is the consignment sampled for inspection?

Samples of the goods for inspection must be drawn randomly across the entire lot/consignment:



- prior to loading containers or bulk vessel  
or
- for cotton modules, immediately prior to compaction.

## Sampling rates

The following table outlines the sampling rates for cotton.

Inspection type	Sample rate
Raw baled cotton	Six bales per lot must be sampled.
Mote cotton	<ul style="list-style-type: none"> <li>• Six bales per lot must be sampled.</li> <li>• One hand grab sample must be drawn from each of the six bales.</li> </ul>
Cotton modules (unprocessed cotton)	<ul style="list-style-type: none"> <li>• Three modules per lot are sampled.</li> <li>• Two hand grab samples must be drawn from each of the three modules, one from the centre of the module and one from the outside of the module <ul style="list-style-type: none"> <li>○ each grab sample must weigh at least 50 grams.</li> </ul> </li> </ul>

## Inspection of the sample

- Samples must be inspected immediately after being taken.
- The entire contents of each hand grab sample must be inspected.
- Inspected samples can be returned to the source, if it is practical to do so.

## What are the tolerances for pests and contaminants?

- There is a nil tolerance for live pests.
- There is a nil tolerance for live vermin, their carcasses and their waste.
- Tolerances for pests and contaminants may be specified by the importing country.

**Note:** Other tolerances may be found in pest lists in import permits, Micor cases, protocols and work plans, or on the website of the relevant importing country authority. The client is responsible for providing information on pest lists to the AO.

- Any other contaminating material is acceptable. AO must record the type of contaminant present in the comments section of the inspection record.

**Important:** Tolerance levels imposed by the importing country take precedence over any tolerances listed in this guideline.

## How are pests identified?

### When is pest identification required?

If a live pest or contaminant is detected during inspection, identification is required in the following circumstances:

- the importing country has a pest list and the client seeks to have the pest identified
- the importing country prohibits reconditioning for any pest.

**Note:** Identification may also be required by the department if there is doubt that a treatment intended for the consignment will be effective against the pest.

**Go to the Reference:** [Pests, Diseases and Contaminants of Grain and Plant Products](#) for images of and information about injurious pests or contaminants an AO may encounter when sampling and inspecting prescribed goods.

## Who can provide an identification?

- An inspection AO may identify common pests or contaminants within the limit of their training and knowledge. AOs must not attempt to identify pests or contaminants outside of their area of knowledge.
- Formal identification can be conducted, at the request of the client, by specialist entomologists, pathologists or other specialists accepted by the department as having expertise relevant to the pest, contaminant or symptoms found.

**Note:** If the client does not wish to have a pest or contaminant identified, they can choose to treat and resubmit the goods instead.

**Important:** The product must not be passed for export until the identity of the pest or contaminant has been determined.

**Go to the Reference:** [Plant exports guide – Specimen collection](#) for guidance on how to collect specimens.

## How are pest and contaminant detections recorded?

The number and type of pests/contaminants found must be recorded on the inspection record.

## When does consignment pass or fail inspection?

- A consignment that is **free** from the following passes inspection
  - live pests
  - live vermin, their carcasses or their waste
  - pests or contaminants of quarantine concern to the importing country.
- A consignment that contains any of the above will result in a rejection.
- If any part of the consignment does not pass the inspection the entire lot/consignment fails the inspection, unless the client has split the consignment for inspection.
- Rejected goods must be segregated and clearly distinguished from goods that have passed inspection.

The following table outlines the process for passing or failing inspections:

Stage	What happens	Responsible party
1.	The inspection result is recorded on the inspection record.	Inspection AO
2.	The product is secured from other goods.	Client
3.	The inspection result and supporting documents are submitted to the department.	Inspection AO

**Note:** Following the failure of an inspection a client can either withdraw the lot/consignment from export or treat it and re-present it for inspection.

## What are the treatment requirements?

- Rejected goods can be treated and resubmitted for inspection.
- The method of treatment is at the client's discretion but must address all life stages of the pest and result in the goods being export compliant.

**Important:** The department must not stipulate a treatment method unless required by the importing country.

## When is treatment not permitted?

Consignments must not be treated and re-presented for inspection if the importing country specifies that treating is not permitted for any reason.

## Treating live insect infestations, diseases and contamination

### Treating live insects

Goods that have been rejected for live insects must be treated using one of the following:

- insecticide
- fumigant.

### Treatment using pesticides and fumigants

- If a pesticide or fumigant is used, it must
  - be suitable for controlling the pest species, verified by the label issued by the Australian Pesticides and Veterinary Medicines Authority (APVMA)
  - meet Australian legislation and standards
  - meet the importing country's requirements, if specified by the importing country NPPO
  - occur within the specified timeframe set by the importing country
  - be used in accordance with its registered label under a law of the Commonwealth, State or Territory.
- Fumigations must be conducted by fumigators who hold a valid fumigation license issued by the relevant state or territory authority.
- Fumigations must be conducted using the fumigant and rates specified by the importing country or, if no fumigant and/or rate is specified, fumigations must be conducted using a fumigant registered to control stored product insect pests by the APVMA for use on the goods at registered label rates.
- When the fumigants and/or dosages specified by the importing country are not registered by the APVMA for that product, the fumigator must seek an off-label permit from the APVMA before conducting the fumigation.

### Treating contaminants

The following table outlines the requirements for treating contaminants found in cotton during inspection.

For contaminants...	Then...
with a nil tolerance	ginning of the relevant goods must be carried out to remove the contaminating material
with a numerical tolerance	ginning to below the permitted tolerance may be carried out

For contaminants...	Then...
on the outside of packages	contamination may be removed by brushing or other mechanical means.
any other contaminants	Re-processing not required (for unprocessed cotton modules for export)

## What are the requirements for the re-inspection of a consignment?

### Resubmitted consignments

Resubmitted consignments intended for export must be presented for phytosanitary inspection in accordance with the following:

- Goods must not be re-submitted for inspection if there is no approved method of treating the goods.
- If the composition of the consignment has changed, a new RFP must be lodged.
- The following information must be provided by the client to the AO prior to the inspection
  - a copy of the original RFP (in cases where a new RFP has been lodged), as well as the previous inspection record
  - a written notification that the goods previously failed inspection, and the method of treatment that was applied
  - evidence that the treatment has been applied, if applicable; for example, a treatment declaration or certificate
  - if a fumigant is applied, a gas free certificate, issued by an accredited/licensed fumigator
- The goods must not be resubmitted for re-inspection until after the exposure, airing, ventilation, withholding periods and safety precautions (specified on the registered label or treatment certificate) have been achieved.
- The original RFP number must be referenced on the inspection record.
- The resubmitted goods must be inspected in accordance with the Work Instruction: [Inspection of raw baled cotton](#).

### Delayed consignments

The consignment must be re-inspected if:

- the time between inspection and export exceeds 28 days
- or
- the maximum time between inspection and export permitted by the importing country is exceeded (when less than 28 days).

The importing country's requirement takes precedence over the 28-day period. Re-inspection must be requested if the above conditions have occurred unless an extension (see section: [Export validity period](#)) has been granted.

## What are the post-inspection requirements?

### Export permits

Consignments of cotton for export must have an export permit if a phytosanitary certificate is required by the importing country. An export permit is issued to the client by the department once the goods have been deemed to be export compliant (meet legislative and importing country requirements).

## When is an export permit not required?

Consignments 10 kilograms or less are exempt from requiring an export permit but may still require a phytosanitary certificate if required by the importing country.

## Export validity period

- Consignments that pass inspection remain compliant for 28 days after the inspection date.
- The phytosanitary status of the goods must be fully maintained from the time of inspection until the time the goods are exported.
- The period of export validity may be extended beyond the 28 days, with prior approval by the department. Any additional approved period must not exceed 28 days.

The following table outlines the process for granting an extension to the export validity period.

Stage	What happens	Responsible party								
1.	<p>An extension to the export validity period is requested.</p> <p>Details supporting the request are provided before the end of the initial 28-day period to the department’s <a href="#">Grain and Seed Exports Program</a>.</p> <p>The request must include:</p> <ul style="list-style-type: none"><li>• why an extension is required</li><li>• a proposal for a justifiable period of extension</li><li>• information that gives assurance that the phytosanitary status of the goods has not changed or been compromised since inspection.</li></ul>	Client								
2.	The extension request is assessed and a decision is made.	Grain and Seed Exports Program								
3.	<table><tr><td colspan="2">The client is informed of the decision for the extension via email.</td></tr><tr><th>If the decision is...</th><th>Then the email will include...</th></tr><tr><td>to approve the request</td><td><ul style="list-style-type: none"><li>• the name of the approving departmental delegate</li><li>• the description of the goods that includes the quantity/weight and destination</li><li>• the date range during goods may remain passed for export</li><li>• the RFP number</li><li>• the date of inspection of the goods</li><li>• the number and date of the import permit (where applicable)</li><li>• any additional declaration.</li></ul></td></tr><tr><td>to refuse the request</td><td><ul style="list-style-type: none"><li>• the decision to refuse</li><li>• the reasons for the decision to refuse the request.</li></ul></td></tr></table>	The client is informed of the decision for the extension via email.		If the decision is...	Then the email will include...	to approve the request	<ul style="list-style-type: none"><li>• the name of the approving departmental delegate</li><li>• the description of the goods that includes the quantity/weight and destination</li><li>• the date range during goods may remain passed for export</li><li>• the RFP number</li><li>• the date of inspection of the goods</li><li>• the number and date of the import permit (where applicable)</li><li>• any additional declaration.</li></ul>	to refuse the request	<ul style="list-style-type: none"><li>• the decision to refuse</li><li>• the reasons for the decision to refuse the request.</li></ul>	Grain and Seed Exports Program
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to refuse the request	<ul style="list-style-type: none"><li>• the decision to refuse</li><li>• the reasons for the decision to refuse the request.</li></ul>									

Stage	What happens	Responsible party
4.	If the inspection was recorded in PEMS, PEMS is updated with the new expiry date.	Grain and Seed Exports Program
5.	EXDOC is updated if the export validity period is extended.	Business Systems Program

## Maintaining the phytosanitary status of goods

The phytosanitary status of the goods must be maintained from the time of sampling and inspection until the time the goods are exported.

When the passed goods are not packed immediately into containers at the registered establishment, the occupier of the establishment must:

- maintain the phytosanitary status of the goods
- stack the lots so that safe access can be made to facilitate visual inspection of the consignment
- check the packs prior to loading to ensure they are not harbouring any pests (for example, rodents in gaps between bales or on bale edges), and they remain clean and free of any contamination.

## What are the requirements for exporting goods not of Australian origin?

Imported goods may be exported as part of a larger consignment containing Australian goods. Consignments of this type are covered under a single phytosanitary certificate if:

- any additional declarations required by an importing country authority can be satisfied by product inspection
- the certificate indicates that the consignment contains product of both Australia and other countries
- all commodities on the phytosanitary certificate not of Australian origin must have their country of origin listed.

## What are the requirements for the re-export of goods?

Re-export phytosanitary certificates must be issued for imported prescribed goods re-exported from Australia if phytosanitary certification is required by the importing country authority, and the:

- goods are accompanied by a phytosanitary certificate issued by the country of origin or a certified true copy of the phytosanitary certificate issued by the country of origin

**Important:** AOs must validate the original or certified copy of the phytosanitary certificate from the importing country(ies) at the time of inspection.

- identity of the goods can be established
- consignment has not been exposed to infestation or contamination while in Australia
- goods must be inspected by an AO in accordance with the [Work Instructions](#)
- goods comply with the requirements of the importing country authority
- goods in the consignment must not have been grown or processed to change their nature in Australia.

## Imported goods not accompanied by an original phytosanitary certificate

If imported goods are not accompanied by an original phytosanitary certificate or certified true copy and are to be exported, an Australian phytosanitary certificate must be issued. The country(ies) of origin must be listed in the Additional Product Description field of the RFP.

Go to the Reference: [Completion of a phytosanitary certificate for re-export \(EX25\) user guide](#) for further information on re-export phytosanitary certificates.

## How is certification issued?

An export permit and phytosanitary certification must be requested once the consignment has passed inspection and has met all additional requirements of the importing country.

Go to the Guideline: [Issuance of certification for plant exports](#) for information on the process for issuing certification.

## Record keeping

Where documents are not available in PEMS; clients, exporters, occupiers of registered establishments and AOs must retain documentation in relation to receivals, inspections, audits, registration, accreditation and export certification for a period of at least two years.

## Related material

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

- Manual of Importing Country Requirements ([Micor](#)).
- [Micor Plants](#) (importing country requirements, protocols and work plans)
- [Protocols, work plans](#)
- [Exporting plants and plant products: A step-by-step guide for Australian exporters](#)
- [Plant Export Operations Manual](#)
  - Guideline: *Management of plant export registered establishments*
  - Guideline: *Issuance of certification for plant exports*
  - Work instruction: *Inspection of raw baled cotton*
  - Reference: *Pests, diseases and contaminants of grain and plant products*
  - Reference: *Inspection technique guide – raw baled cotton*
  - Reference: *Work health and safety in the plant export environment*
  - Reference: *Grain and plant product inspection record*
  - Reference: *Bulk into ships hold inspection record*
  - Reference: *Bulk vessel loading running record*
  - Reference: *Completion of a phytosanitary certificate for re-export (EX25) user guide*
  - Work Instruction: *Completing plant export inspection and treatment records*
  - Reference: *Plant Export Management System authorised officer user guide*

The following related material is available online:

- [International Standards for Phytosanitary Measures \(ISPM\) 15 – for wood packaging material](#).

## Contact information

- Authorised Officer national helpline: 1800 851 305
- Authorised Officer Program: [PlantExportTraining@aff.gov.au](mailto:PlantExportTraining@aff.gov.au)
- Assessment and Client Contact Group: [PlantExportsNDH@aff.gov.au](mailto:PlantExportsNDH@aff.gov.au)
- Grain and Seed Exports Program: [Grain.Export@aff.gov.au](mailto:Grain.Export@aff.gov.au)
- Grain and Seed Exports Program hotline: 02 6272 3229

- Business Systems Program: [EXDOCPlantPrograms@aff.gov.au](mailto:EXDOCPlantPrograms@aff.gov.au)
- Micor Administrator: [Micorplants@aff.gov.au](mailto:Micorplants@aff.gov.au).

## Document information

The following table contains administrative metadata.

Instructional Material Library document ID	Instructional material owner
IMLS-9-6004	The Director, Grain and Seed Export Program, Plant Export Operations Branch

## Version history

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

Version	Date	Amendment details
1	3/03/2020	First publication of this guideline.
2	3/06/2020	Document re-published from IML Archive with no changes.
3	28/03/2021	Updates to reflect the commencement of the <i>Export Control Act 2020</i> and associated Plant Rules.
4	27/05/2022	Updates to allow for loading into bulk vessels.
5	24/11/2023	Updated department branding, email addresses and the references related to registered establishments to ensure clarity of the content and to prevent mis intended interpretation.