



# GUIDELINE

## Inspection of hay and straw 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 exporters preparing hay and straw from 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 prescribed hay and straw to enable export certification. It includes:

- pre-inspection requirements
- registered establishment requirements
- sampling requirements
- inspection requirements
- pest identification and tolerances
- pass and failure principles
- treatment requirements
- post-inspection requirements.

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## Purpose of this document

This guideline details the policy and process for the phytosanitary inspection of hay and straw products for export. It includes the following commodities:

- hay
- straw
- compound feed
- mixed fermented feed (silage)
- chaff.

**Important:** This document is to be used in conjunction with the importing country's requirements (ICRs) listed in import permits, protocols, work plans 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>
Bale	A wrapped or bound bundle of fodder.
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>
Chaff	Consisting of chopped straw or coarse hay into very short lengths using a machine. Chaff is not subject to ARG.T.
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>
Commercial Samples (of hay or straw)	Sample bags/packets with the purpose of establishing trade/buyer acceptance of the product.

Term	Definition
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>
Compound feed	<p>A composite product made of a minimum 80% hay and/or straw with an additive to increase protein levels. Additives can include, but are not limited to, pulse and oilseed (whole, cracked and meal) and mineral supplements. Compound feeds are subject to ARGT testing and must be sampled and inspected as per hay and straw in accordance with the appropriate work instruction.</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>
Container	<p>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.</p>
Empty container inspection record	<p>The approved form on which an AO records container inspection details and results, including whether a container is approved for loading, or failed inspection.</p> <p><b>Note:</b> The container inspection record includes PEMS or the manual equivalent available on the PEOM.</p>
Container approval	<p>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.</p>
Contaminant	<p>Any foreign matter, whether organic or inorganic, that is included in, on, or with prescribed goods (can include soil, weed seeds, leaves, stems and extraneous material).</p>
Country of origin	<p>The country where the plants or plant products were grown, produced, or exposed to infestation by pests or contaminants.</p>
Department	<p>Department of Agriculture, Fisheries and Forestry. The department is the Australian Government's nominated National Plant Protection Organisation (NPPO).</p>

Term	Definition
Departmental requirements	Requirements for the export of prescribed plants and plant products stipulated by the department under the <i>Export Control Act 2020</i> and its subordinate legislation.
End-point sampling	A sampling method whereby the inspection AO samples the goods after processing and containerisation of hay and straw for inspection. <b>Note:</b> End-point sampling is not permitted for hay to China, unless used in cases of re-inspection).
Export documentation system (EXDOC)	The department's electronic export documentation system in which export certification is produced. This includes export permits and phytosanitary certificates.
Export compliant goods	Goods that have been presented to an AO and passed assessment, are considered to be 'passed export compliant' and have attained a Phytosanitary Status.  These goods are considered compliant with requirements for export set out in the Plant Rules as required under the <i>Export Control Act 2020</i> .
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 Product) Rules 2021 for the lawful export of prescribed plants and plant products.
Flowpath	Is from 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 contaminated after inspection and during loading. For non-bulk commodities, this may include the receipt, storage (when storing passed goods), treatment, inspection, conveyor systems and despatch areas.
Hay and straw	Pasture or cereal plant (either whole or after harvesting seed) that is cut and dried. Hay and straw from any pasture or cereal plant, including oats, barley and wheaten hay and straw (excluding rice straw) are subject to annual ryegrass toxicity (ARGT) testing.
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.
In-line sampling	A sampling method that uses either an approved calibrated automatic in-line system, or manual sampling by the inspecting AO who draws samples of the goods for inspection from the production line at defined intervals.

Term	Definition
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 individual AOs.
Inspection Record	The approved form for an AO to record the findings and result of an inspection of plants and plant products for export. (See also Grain and Plant Product Inspection Record).
Grade/type	A quantity of goods of a single type, identifiable by its homogeneity of composition and origin, forming part of a consignment.
Grain and plant products inspection record	The approved form (inspection record) for an AO to record the findings and result of an inspection of prescribed grain and plant products (including hay and straw products) for export. <b>Note:</b> The grain and plant products inspection record includes PEMS and the equivalent manual record available on the PEOM.
Lot (container lot)	Units of a single commodity, identifiable by its homogeneity of composition and origin, defined during sampling. A single container with packed hay - 'container lot' or hay on the production line that would constitute the 'container lot' being processed/packed.
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.
Mixed fermented feed	A mixture of hay/straw and other additives that is fermented including silage. Mixed fermented feed is not subject to ARGV testing.
Mixed consignment	A consignment of plant and plant products for export that is made up of various product types.
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 National Plant Protection Organisation.
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.
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.

Term	Definition
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 and is bilaterally agreed to by Australia and the importing country authority.  <b>Note:</b> Countries in which 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.
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.
Secure	Packages or samples that are fully enclosed to ensure nothing can escape from or infest/contaminate the sample.
Secure port zone	Maritime (or Airport) security zones having restricted access in and around the port, wharf or airport facilities.
Silage bale	Green fodder compacted and stored in airtight conditions without first being dried, and used for animal feed.
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.



Term	Definition
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: <ul style="list-style-type: none"> <li>• 1 bale</li> <li>• 1 bag, 1 carton, 1 package.</li> </ul>

## Legislative framework

The following list outlines the legislation that applies to the phytosanitary inspection of plants and plant products for export.

- *Export Control Act 2020* and *Export Control (Plants and Plant Products) Rules 2021 (Plant Rules)*
  - Section 211 Plant Rules – Plants and plant products that are prescribed goods
  - Section 2-3 and 2-4 Plant Rules – Prohibited export and prescribed export conditions
  - 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 description
  - 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
- *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 RFP and supporting documents.</li><li>• Requesting export inspection.</li><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>• 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>• Selecting the sampling rate.</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 a formal identification of pests detected during inspection, where applicable.</li><li>• Maintaining the phytosanitary status of the consignment</li><li>• Treating rejected consignments, 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>
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>• Checking that the inspection bench is compliant.</li><li>• Validating RFP and supporting documents.</li><li>• Checking the consignment matches the RFP.</li><li>• Checking the consignment matches the trade description where applicable.</li></ul>

Role	Responsibility
	<ul style="list-style-type: none"> <li>Inspecting and verifying compliance of packaging material.</li> <li>Verifying the product security of the consignment.</li> <li>Verifying that empty containers 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 Export Program	Assessing the requests for an extension 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 phytosanitary status of goods until export.</li> <li>Maintaining the establishment in accordance with the relevant legislation and Guideline: <a href="#">Management of plant export registered establishments</a>.</li> <li>Maintaining records of ARGT testing of cereal hay and straw processed at the establishment.</li> </ul>
Micor administrator	Creating or amending Micor cases as required.

## Inspection by an AO

- Hay and straw must be inspected by an AO that has been appropriately trained, deemed competent and appointed by the department for the job function HAS3001 *Export inspection of hay and straw*.
- Inspection of hay and straw must be carried out in accordance with
  - Work Instruction: [Inspecting hay and straw bales for export in-line and end-point](#)
  - Work Instruction: [Inspecting bagged chaff and hay for export](#)
  - Work Instruction: [Inspecting loose hay or straw for export in-line](#).
- Inspection AO's 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 WHS policies of their organisation during the packing, treatment and movement of goods.
- Inspection AOs must
  - read and be familiar with 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 work health and safety (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
- nitrile rubber or polyvinyl chloride examination gloves
- 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, 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 individual 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
- carry their departmental identity cards at all times (department AOs only).

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

## What are the pre-inspection requirements?

### Importing country requirements

Where the import requirements are unknown or differ to Micor, they must be:

- obtained from the importing country authority by the exporter
- 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 notice of intention (or RFP) must be:

- lodged prior to inspection
- consistent with the consignment presented for inspection
- in the form of an electronic request for permit (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><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>	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
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>							
3.	The import requirements are assessed, and a Micor case is created or amended as required.	Micor administrator						
4.	A registered establishment approved for the commodity is organised for the inspection.	Client						

Stage	What happens	Responsible party
5.	An RFP is lodged for the consignment to be inspected.	Client
6.	The consignment is 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.	Client

Go to [Exporting plants and plant products: A step-by-step guide for Australian exporters](#) for more information about preparing products for export, booking an inspection appointment and submitting supporting documents.

## What are the registered establishment requirements?

### General requirements

A registered establishment must:

- be maintained by the occupier in accordance with the Guideline: [Management of plant export registered establishments](#) and any relevant legislative requirements
- have a current registration, approved export operations and function codes relevant to the commodity inspection

**Refer to** the Reference: [Registered operation and function codes for plant export registered establishments](#) for the required codes.

**Important:** The Annual Rye Grass Toxicity (ARGT) function activity is required if the establishment is processing cereal hay or straw for export.

- have receipt, storage, processing line/area, inspection, treatment and despatch areas clean and free from pests and contaminants
- have an inspection bench that is
  - well-lit, lighting can be natural or artificial
  - clean
  - white (if using stainless steel, the bench must be covered with white paper prior to each inspection or a white inspection tray that covers the bench)
  - 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

Occupiers of registered establishments must:

- present compliant goods to the AO for inspection
- ensure that where a trade description is applied to hay and straw products it is adequate and accurate.

### Preparation requirements

Hay for export must meet preparation requirements to the satisfaction of the department to ensure consignments prepared for export are free from pests and contaminants, or contain levels as specified by the importing country as required under legislation.

- Establishments must have documented quality systems and processes in place to ensure hay sourced for export will meet (subject to final secondary processing) importing country requirements.
- Hay for export must be subject to secondary processing in a registered establishment that as a minimum involves teasing or x-ray, slicing, and metal detection prior to packing.

## Commodity flowpath

- The commodity flowpath is from the point of sampling to the point of loading.
- 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 flowpath 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.
- There must be no risk of substitution with other product moving within the vicinity of the consignment.
- The flowpath must be inspected and passed by an AO immediately prior to the commencement of processing, sampling, inspection and loading of each consignment.
  - Where loading of containers is continuous (back-to-back) throughout a shift and involves packing the same commodity for multiple RFPs, the flowpath inspection must be conducted at the beginning of the day as a minimum.

**Important:** If the commodity changes, the flowpath must be cleaned down, re-inspected and passed.

- The flowpath must be re-inspected if there is a change in condition that presents a risk of contamination or cross contamination to the goods/flowpath during processing/loading.
- If a non-conforming flowpath is rectified, it must be reinspected and passed by an AO prior to processing and sampling. If the flowpath cannot be rectified, the flowpath inspection must be recorded as failed.
  - For in-line sampling (loose and baled hay), the flowpath inspection is from the point of sampling to the point of loading.
  - For end-point sampling, the flowpath is from the point of sampling to point of inspection.
- Where the flowpath has been treated with an insecticide or fumigant, it must not be re-inspected until after the safety precautions (including exposure or airing periods) specified on the registered label or treatment certificate have been observed.

**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 sampling and inspection 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. Prior to loading, occupiers of the registered establishment must ensure packs of hay maintain their phytosanitary status and are not harbouring any pest/rodents, and it remains clean and free of any contamination. Rodent barriers in containers must also be used.

## ARGT testing

Hay or straw for export from any pasture or cereal plant, including oaten, barley and wheaten hay and straw (excluding rice straw) must undergo laboratory analysis to test for ARGT contamination.

Refer to [Attachment 2](#) for more information.

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

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

Inspection of empty containers and bulk vessels ensures requirements have been complied with in the transport of prescribed goods and no cross contamination issues exist with loading prescribed goods into inspected empty containers or bulk vessels.

### Empty container approval

Empty containers intended for loading must have been issued a container approval that has not expired (is within 90 days of inspection) and has not been revoked.

### Rodent barriers

Rodent barriers must be used:

- in containers at all times where containers are left open, and there are breaks in production/loading activity
- particularly where containers have been packed but container doors cannot be completely closed due to uneven ground. Container doors must be closed where possible following loading.

### Bulk vessel approval

Bulk vessels intended for loading 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.

## Automatic in-line sampling systems

### Application requirements

- The occupier/s of registered establishments must submit an application to the department along with a standard operating procedure (SOP), for approval to undertake automatic in-line sampling of loose hay or straw.

**Note:** For more information on how to apply for automatic in-line sampling see the Guideline: [Management of plant export registered establishments](#), or contact the [Grain and Seed Export Program](#).

- The SOP must detail all related processes and procedures for the establishment's proposed automatic in-line sampling system.
- Applications for automatic in-line sampling systems must
  - document how the requirements for in-line sampling of loose hay or straw will be met

**Important:** These must include (but are not limited to) requirements described below.

  - include a product flowchart and site map detailing the hay/straw processing at the establishment from storage of unprocessed bales, processing of the bales, sample point to loading of compressed bales for export.
- GSEP will advise Audit and Assurance Group once the SOP is approved.

### Requirements for automatic sampling systems

- Automatic in-line sampling systems must be calibrated to deliver a minimum sample of 0.5 kg over five sub-samples per container lot.
- Important:** The occupier/s of a registered establishment is responsible for ensuring the system is calibrated at least annually, with records kept of this activity.
- Sampling systems can either collect hay material continuously or through reversal of belts at set intervals, or other suitable means.
  - Loose hay collected post teasing, or loose hay from the slicing process is suitable for automatic sample collection (with sampling post teasing preferred).
  - Unprocessed hay or straw (that is, paddock bales) is not suitable for automatic in-line sampling.
  - Samples collected must be



- representative of the shipping container lot for export
- adequately sealed/secured in plastic tubs to ensure nothing can escape from or infest/contaminate the sample
- labelled with the details of the container lot the sample was drawn from and the relevant RFP number.
- The AO must verify or be satisfied during inspection that all container lots have been adequately sampled, and that labelling is correct, clear and allows direct linkage to container lots and the relevant RFP.
- Contingency arrangements must be available for sampling if the automatic system fails.
- Automatic in-line sample collection must be supervised by the inspection AO.
  - Where establishments operate overnight using multiple shifts and the inspection AO is unavailable to supervise sample collection, establishments must have
    - documented systems in place to ensure samples are secured and labelled, ready for AO inspection during the next shift (and before the container lot arrives at the secure port zone)
    - documented processes in the event that a container lot fails and requires treatment and re-inspection.
  - If an AO is not able to supervise bale labelling for oaten hay for China then
    - the AO must verify labelling requirements in advance of their shift where they will not be present
    - the establishment must have a documented and auditable quality system in place to ensure that all requirements are met.

**Important:** The department may vary an establishment's approval and remove their registration for automatic in-line sampling of loose hay or straw operations, if the requirements for this type of sampling outlined in this guideline are not complied with. For more information see Guideline: [Management of plant export registered establishments](#).

## What are the consignment inspection requirements?

### Access to the consignment

The consignment must:

- be clearly identifiable
- accessible
- match the RFP.

**Important:** 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.

### Trade description

If a trade description is applied to hay and straw products it must be accurate and unambiguous and meet requirements of the *Export Control Act 2020* and the Plant Rules.

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

If a trade description has been physically applied to hay and straw products (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.

**Important:** China has specific labelling requirements – refer to [Attachment 1](#).

## Packaging material

Materials used as packaging for hay and straw product export consignments must be:

- new (or, if used, must be cleaned before use to ensure it meets all other packaging requirements)
- clean
- appropriate for the hay and straw 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 hay and straw products packed into them, including
  - free from pests and contaminants
  - free from holes/rips/tears
  - unlikely to impart odour
  - that is unlikely to place the acceptability of the goods at risk
- compliant with any specific importing country's requirements
- compliant with the [International Standards for Phytosanitary Measures \(ISPM\) 15 compliant – for wood packaging material](#).

## How is the consignment sampled for inspection?

### Sample Integrity

- Loose in-line hay samples or sample bales (taken either in line or at end point) must be representative of each container lot presented for inspection.
- Loose in-line hay samples or sample bales must be manufactured during processing of each container lot/load.
- If the sample cannot be linked to an individual container lot (for example, where a batch of sample bales is produced) the entire consignment must be rejected if a sample fails inspection.

### Sampling rates

The following table outlines the sampling rates for hay and straw products.

Product	Sampling Method	Sampling Requirements
Loose hay and straw	In-line sampling <ul style="list-style-type: none"> <li>• collected manually or</li> <li>• via automatic sampling system</li> </ul>	<u>In-line loose hay sampling/inspection for all countries including China</u> <ul style="list-style-type: none"> <li>• Samples must be taken off an in-line conveyance system after teasing or slicing of hay or straw.</li> <li>• Samples must be taken at the time of processing for each container lot being processed.</li> <li>• Samples must be drawn directly off the conveyance system/belt at regular intervals across the full duration of processing/loading.</li> </ul>

Product	Sampling Method	Sampling Requirements
		<ul style="list-style-type: none"> <li>Total amount of hay or straw to be sampled and inspected from each container lot is 0.5 kg (or greater), taken as a minimum of five sub-samples.</li> <li>Automatic systems must be calibrated to provide sufficient sample (minimum 0.5 kg) collected throughout processing of each container lot.</li> <li>Automatic systems must be approved by GSEP.</li> <li>Samples must directly link to bales loaded into a specific container lot.</li> </ul>
Hay and straw bales	In-line sampling <ul style="list-style-type: none"> <li>from production line or</li> <li>prior to being loaded into the container</li> </ul>	<u>For all countries, including China</u> <ul style="list-style-type: none"> <li>Bales must be drawn at random during processing of each container lot.</li> <li>At least two sample bales per container lot must be collected for sampling.</li> <li>Sample bales must directly link to bales loaded into a specific container lot.</li> </ul>
Hay and straw bales	End-point sampling <ul style="list-style-type: none"> <li>after loading into the container</li> </ul>	<u>For Japan / Korea and other countries only (excluding hay for China)</u> <ul style="list-style-type: none"> <li>Every container must be sampled and inspected.</li> <li>Sample bales must be manufactured during processing of each container lot/load.</li> <li>At least one sample bale per container load must be drawn for inspection.</li> <li>Any loose hay residues must be brushed and collected from the container doors, walls, seals, floor and surface of visible bales of hay for inspection.</li> </ul>
Silage bales	In-line sampling <ul style="list-style-type: none"> <li>prior to being loaded into the container</li> </ul>	<u>For all countries</u> <ul style="list-style-type: none"> <li>Every container lot must be sampled and inspected.</li> <li>Bales must be drawn at random prior to loading of each container lot.</li> <li>At least two samples per container lot must be collected.</li> <li>Core samples must be collected from each sampled bale, ensuring at least a 0.5 kg sample of cores is collected per container lot.</li> <li>Core samples must be taken at a right angle to the surface.</li> </ul>
Silage bales	End point sampling <ul style="list-style-type: none"> <li>after loading into container</li> </ul>	<u>For all countries</u> <ul style="list-style-type: none"> <li>Every container must be sampled and inspected.</li> <li>At least two core sample per container lot must be drawn for inspection.</li> </ul>

Product	Sampling Method	Sampling Requirements
		<ul style="list-style-type: none"> <li>• Ensure at least a 0.5 kg sample of cores is collected per container.</li> <li>• Core samples must be taken at right angle to the surface.</li> <li>• Any loose residues must be brushed and collected from the container doors, walls, seals and floor.</li> </ul>
Bagged chaff	Sampling prior to being loaded into the container	<u>For all countries including China</u> <ul style="list-style-type: none"> <li>• Every container must be sampled and inspected.</li> <li>• Only samples drawn from the same container lot can be combined for inspection.</li> <li>• Total amount of chaff to be sampled and inspected from each container (or part thereof) is 0.5 kg, taken as a minimum of five random sub-samples.</li> </ul>
Sample bags (commercial samples)	Sampling after filling of the bags	<u>For all countries</u> <ul style="list-style-type: none"> <li>• For consignments of 20 bags or less, all bags in the consignment must be sampled.</li> <li>• For consignments greater than 20 bags, the sampling rate is 20 bags plus the square root of (total number of bags in the consignment minus 20 bags)—round up to the nearest whole number.</li> <li>• Only bags of the same grade/type can be combined for inspection.</li> </ul>

## Movement of containers

- Containers of packed hay must not leave the inspection establishment until the AO has completed their assessment and the hay has passed inspection.
  - Where inspection has been delayed and containers need to meet a transport schedule, the person/s in charge of 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 of passed goods must not be delivered to the secure port zone until after the container (and goods) have passed inspection.

## What are the tolerances for pests and contaminants?

### Live Pests

- There is a nil tolerance for live pest infestations, including rodents.
- Nil tolerance must be applied, irrespective of whether the pests are found
  - on the outside of the bales
  - on the inside of the container
  - or
  - in the samples inspected.
- Where visual signs of infestation and or contamination are found during the inspection, the AO must undertake a more detailed inspection to determine that no live pests are present.

**Note:** Visual signs of mice and rat pest infestation may include emergence holes, droppings and exterior runways in the hay and straw product.

- Contaminants with a tolerance level are listed in the table below.
- Tolerances for pests and contaminants may also be specified by the importing country.

**Note:** Pest lists may be found 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.

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

## Contamination

The following table outlines the tolerances for contamination in inspected samples for all countries, excluding China.

Contaminant	Tolerance level
Animal carcasses or part thereof	Nil
Rodent and vermin droppings	In any single 0.5kg sample not more than seven (7) droppings
Soil and sand	0.2% by weight of the sample

**Note:** The consignment must not be failed for miscellaneous contaminants such as, but not limited to, wood/timber greater than 50 mm<sup>2</sup>, ergot in ryegrass seed, moisture, rags, hessian bags, tools, rocks. The container lot is not rejected; however, the exporter has the option to withdraw the consignment.

The following table lists contaminants with a nil tolerance for exports to China.

Contaminant	Tolerance level
Animal parts including limbs and carcasses	Nil
Animal droppings	Nil
Weed seeds	Nil
Soil	Nil
Metal	Nil
Toxic plants	Nil
Roots	Nil

## How are pests identified?

### When is pest identification required?

- If a live pest or contaminant is detected during inspection, identification is required if the importing country:
  - has a pest list and the client seeks to have the pest identified
  - prohibits reconditioning for any pest.
- The identity of a pest should also be established should a client wish to recondition a rejected consignment to ensure the chosen treatment will effectively address the biosecurity risk.

- Identification may be required by the department if there is doubt that a reconditioning treatment intended for the consignment will address the biosecurity risk.

### 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 by specialist entomologists, pathologists or other specialists accepted by the department as having expertise relevant to the pest, contaminant or symptoms found.

**Important:** The product cannot 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 all pests/contaminants detected during inspection must be recorded in either the *remarks* or *comments* field of the inspection record.

### When does a consignment pass or fail inspection?

- If pests or contaminants are found in excess of tolerances (including nil) in the inspected sample, the hay and straw products must be rejected.
- If the rejected sample cannot be linked to an individual container lot, the entire consignment must be rejected.
- The exporter must ensure that rejected goods are identified, isolated and clearly distinguished from goods that have passed inspection.

**Important:** The inspection of other goods in the area that remain eligible for export must not commence until the rejected goods have been identified and the flowpath has been re-inspected and passed.

### Rejection of the source

For detections of live pests, dead rodents and pests/contaminants of quarantine concern to the importing country, the source must be rejected.

**Note:** For in-line hay, the source is deemed to be hay on the processing line (the container lot) or part thereof for less than container load (LCL). For end point, refer to 'failing end point inspections' below. This note includes all hay, straw and silage type products (bagged chaff, loose hay and straw, baled hay and straw, silage, mixed fermented feed and packaged hay and straw products).

### Failing in-line inspections

- Product already packed and previously sampled, inspected and passed, which has been loaded and containers have been sealed, are passed.
- Product part-packed or intended to be packed within the container lot sampled is rejected.
- Product on the processing line is rejected.
- Product in the container lot that has not yet been processed is rejected.
- The exporter must ensure that rejected goods are identified, isolated and clearly distinguished from goods that have passed inspection.

## Failing end-point inspections

- The entire container lot is rejected.
- The exporter must ensure that rejected goods are identified, isolated and clearly distinguished from goods that have passed inspection.

## Re-inspecting the flowpath following a rejection

The flowpath must be reinspected and passed before the inspection can continue.

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 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 biosecurity risk and result in the goods being export compliant.  
**Note:** The department will not stipulate a treatment method unless required by the importing country.
- In the case of a live pest being found, the affected product must have been secured from the rest of the consignment for this option (treatment) to be acceptable. 'Secured' means that packages are fully enclosed or at all times separated.

## 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 pest infestations, diseases and contaminants

### Treating pest infestations

- Goods that have been rejected for live pests must be treated using an insecticide or fumigant that is suitable for controlling the pest species.
- A treatment certificate must be provided when resubmitting the consignment for inspection.

### Treating pathogens/disease

The exporter must provide relevant scientific evidence (by a suitably qualified plant pathologist) attesting to the effectiveness of the treatment.

### Treating contaminants

The following table outlines the requirements for treating contaminants found in hay and straw products during inspection.

For contaminants...	Then...
with a nil tolerance	<ul style="list-style-type: none"> <li>the affected goods must be cleaned before resubmission for export inspection</li> </ul> <p><b>Note:</b> Different tolerances may apply for some importing countries. Cleaning may include re-processing/teasing to ensure contamination removal.</p> <ul style="list-style-type: none"> <li>if rodent carcasses are found within a bale (sampled in line or at end point), or 'loose in-line' hay, the product must be cleaned. Cleaning must include reprocessing or any other suitable remediation method.</li> <li>if rodent or other animal carcasses are found in a container, but not within a bale, the container must be unpacked to remove the carcasses.</li> </ul> <p><b>Note:</b> The client may also choose to break packs or fully re-process.</p>
with a numerical tolerance	<p>cleaning to below the permitted tolerance may be carried out.</p> <p><b>Note:</b> Different tolerances may apply for some importing countries. Cleaning may include re-processing/teasing to ensure contamination removal.</p>
on the outside of packages	contamination may be removed by brushing or other mechanical means.

### Treatment using pesticides and fumigants

- Rejected consignments, treated with a pesticide, must not be resubmitted for inspection until after any safety period has passed and precautions specified on the registered label are met.
- If a fumigant is applied, the client must also provide a gas free certificate, issued by an accredited/licensed fumigator, to ensure it is safe before the reinspection of the goods.
- 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.



# What are the requirements for the reinspection 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 re-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
  - if the goods failed due to the detection of disease symptoms or pathogens, relevant scientific evidence provided by a suitably qualified plant pathologist attesting to the effectiveness of the treatment

**Note:** Evidence of disease may still result in rejection of the consignment by the importing country authority.

- The goods must not be submitted for re-inspection until after the exposure, airing, ventilation 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 relevant work instruction.
- The AO must record the method used by the exporter to rectify the cause of rejection on the approved inspection record for all re-inspected goods.

## 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).

Clients must request reinspection if the above conditions have occurred unless an extension (see section: [Export validity period](#) below) has been granted.

Delayed consignments must be resubmitted for inspection for the consignment to regain its export compliant status.

# What are the post-inspection requirements?

## Export permits

All consignments for export must have an export permit. 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

- Compound feed, mixed fermented feed, silage and chaff, do not require an export permit if no phytosanitary certificate or other official certificate is required by the importing country.
- Consignments less than ten (10) kilograms are exempt from requiring an export permit, but may still require a phytosanitary certificate.

### Export validity period

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

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 <b>before the end of the initial 28 day period</b> 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

Stage	What happens	Responsible party						
3.	The client is informed of the decision for the extension via email.	Grain and Seed Exports Program						
	<table><tr><th>If the decision is to...</th><th>Then the email will include...</th></tr><tr><td>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>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>		If the decision is to...	Then the email will include...	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>	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>
	If the decision is to...		Then the email will include...					
	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>					
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>							
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, occupiers of the establishment must:

- maintain the phytosanitary status of the goods
- stack the container 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 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.

## 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.

**Refer 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, 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 2 years.

## Related material

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

- Manual of Importing Country Requirements ([Micor](#))
- [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: *Inspecting hay and straw bales for export in-line and at end point*
  - Work instruction: *Inspecting loose hay and straw for export in-line*
  - Work Instruction: *Inspecting bagged chaff and hay for export*
  - Guideline: *Supporting documents for plant exports*
  - Work Instruction: *Completing plant export inspection and treatment records*
  - Reference: *Plant exports guide – Equipment*
  - Reference: *Plant exports guide – Specimen collection*
  - Reference: *Inspection technique guide – Hay and Straw*
  - Reference: *Work health and safety in the plant export environment*
  - Reference: *Grain and plant product inspection record*
  - 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)

- 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
- Assessment and Client Contact Group: [PlantExportsNDH@aff.gov.au](mailto:PlantExportsNDH@aff.gov.au)
- 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-9-7079	Director, Grain and Seed Exports

## Version history

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

Version	Date	Amendment details
1.0	5/08/2020	First publication of this guideline.
2.0	28/03/2021	Updates to reflect the commencement of the <i>Export Control Act 2020</i> and associated Plant Rules.
3	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.

## Attachment 1: Hay and straw exports to China

Hay and straw exported to China require due diligence from the exporter and AO as China has special requirements as listed.

### Registered establishments for export of oaten hay to China

Occupiers of establishments exporting oaten hay to China are required to meet specific conditions in addition to what is required for hay establishments exporting to other countries. In particular, establishments exporting oaten hay to China must be approved by the department and listed as suitable by the Chinese authorities. A list of approved establishments is available on the Micor database.

Goods passed for export must be segregated from uninspected product, rejected product and product not pressed. Chinese import conditions require the use of physical barriers and clear identification of passed product.

### Quality management system

The establishment occupier must implement a quality management system based on the Hazard Analysis Critical Control Point (HACCP) concept. The HACCP concept is internationally recognised as a method for defining and managing requirements for effective control of product safety and hygiene. HACCP facilitates the identification and maintenance of 'critical control points', which limit risks to the consumer. Occupiers of establishments should consult with the department to determine if they have adequately identified all critical control points and have addressed them adequately. Once they have drafted their quality management plan they will need to submit a copy to the department for approval.

### Tolerances for hay and straw to China

Refer to the [List of contaminants with a nil tolerance for export to China](#).

### Labelling requirements for export to China

The AO must verify or be satisfied that all bales have been labelled as required under the China hay inspection and phytosanitary requirements. The registered establishment must have a documented quality system in place to ensure the labelling meets China's requirements.

For exports to China the AO must check that there is at least one label on each bale or pack of bales in standard Chinese characters and in English detailing all of the following:

- Product, that is 'Oaten Hay'
- Establishment name and address
- Establishment registration number
- Country of origin
- Country of destination
- Weight of bales or pack of bales
- Product use, that is animal feed
- Crude protein
- Neutral detergent fibre levels.

## Attachment 2: Annual ryegrass toxicity (ARGT)

ARGT is caused by toxins produced by the bacterium *Rathayibacter toxicus* that infect the seed heads of ryegrass. The bacterium is transferred to ryegrass seed heads by nematodes (*Aguina* spp.). The nematode, which only has one lifecycle each year, invades the ryegrass during winter and produces a gall in spring that replaces a developing seed in the immature seed head. If the bacterium is present, it quickly multiplies during early spring, swamping the nematode and taking over the gall. After the ryegrass flowers, the bacterium begins to produce a powerful tunicamycin-like poison toxin called corynetoxin. Toxin production increases rapidly just before the grass hays-off and persists in dry pasture or hay and if ingested by livestock it causes annual rye grass toxicity, resulting in death.

Hay and straw from any pasture or cereal plant, including oats, barley and wheaten hay and straw must undergo laboratory analysis to test for ARGT contamination. Australia has well established procedures to ensure examination of field product for the presence of corynetoxin contamination of all export cereal hay and straw.

The department has produced a [standard for minimising the risk of corynetoxin contamination of hay and straw for export](#), which is available on the department's website. The standard allows producers or exporters to test for corynetoxin directly using a test for corynetoxin or indirectly using a test for *R. toxicus*. A test for *R. toxicus* is useful because samples of hay and straw tested for *R. toxicus* and found to be negative cannot contain corynetoxin. The test must show negative results for corynetoxin or *R. toxicus* before the hay is allowed for export.

### Test results

ARGT test results will be audited by the department at the registered establishment audit. At the audit the processor must demonstrate that:

- all hay entering their facility has been tested in the field and returned a negative result for ARGT or
- for hay received on-site, where ARGT status is not known to be negative, there is a process in place to ensure that hay is not processed for export until a negative ARGT test has been received.

The processor must provide the following to the auditor:

- documented procedures for the intake of hay into the establishment, with specific reference to how hay with unknown ARGT status is segregated from hay with a know status
- documented program detailing ARGT testing procedures and the method of recording results
- a summary report of all lots exported since the last audit with reference to the negative ARGT test result
- copies of every ARGT test result.

**Important:** ARGT test results must be provided on a signed letter head from the laboratory undertaking the testing using an approved method.

The auditor will trace a number of consignments from farm to export to confirm the bales used and to ensure they tested negative for ARGT.