



# GUIDELINE

## Mobile Bulk Loading of prescribed goods 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 clients

Clients must meet their responsibilities as outlined in this guideline.

### Direction to registered establishments

Occupier/operators of registered establishments must meet their responsibilities as outlined in this guideline.

---

### Summary of main points

This document outlines:

- the operation of a registered establishment approved for sampling and assessing prepared prescribed goods as part of a mobile bulk loading facility
- requirements for the approval and implementation of an arrangement to sample and assess prepared compliant (prescribed) goods that are loaded into a bulk vessel via a mobile bulk loader
- the processes for Authorised Officers (AOs) involved in sampling and inspecting compliant prescribed goods at the point of export to follow. This guideline must be read in conjunction with the relevant instructional material available on the Plant Exports Operation Manual (PEOM) and the site-specific work plans
- the processes for persons involved in the operation and management of a registered establishment approved for Mobile Bulk Loading.

## In this document

This document contains the following topics.

Purpose of this document.....	2
Definitions .....	3
Legislative framework.....	7
Roles and responsibilities .....	8
Introduction .....	9
Inspection by an authorised officer .....	10
Mobile Bulk Loading modes of operation.....	10
Prerequisite and application requirements .....	11
Audit.....	14
Non-Compliances .....	14
Record keeping .....	15
Related material.....	15
Contact information .....	16
Document information .....	16
Version history .....	16
Attachment 1: Sample of Standard Operating Procedures for the application of MBL .....	17
Attachment 2: Process Map AO Inspection at Wharf EREs .....	19
Attachment 3: Process Map AO inspection at upcountry EREs.....	20

## Purpose of this document

This document details the policy and process for the phytosanitary inspection of prescribed grain and plant products for export by an approved Mobile Bulk Loading (MBL) operation. It includes the following commodities:

- whole or split grain and seed
- grain milling fractions
- woodchips.

**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](#)).

## Definitions

The following table defines terms used in this document.

Term	Definition
Authorised officer (AO)	<p>A person authorised under section 291 of the Export Control Act 2020 to be an authorised officer. The AO may exercise powers and functions conferred on them through an instrument of authorisation.</p> <p><b>Note:</b> An AO 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 AO 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>
Bulk vessel inspection record	<p>The approved form on which an AO 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 AO records inspection activity or issues as they arise during loading of a bulk vessel</p> <p><b>Note:</b> The bulk vessel loading running record is available on the PEOM.</p>
Certification	The process where an export permit and government certificate(s) are issued in relation to goods that are to be exported under chapter 7 and chapter 2 of the <i>Export Control Act 2020</i> , respectively.
Client	The exporter, exporter's representative or person responsible for prescribed goods intended for export.

Term	Definition
Commodity	A type of plant or plant product being moved for trade or other purpose. <b>Note:</b> 'Product' and 'goods' are also used interchangeably with the term commodity.
Consignment	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.  Can be composed of one or more commodities. May be presented in lots and may not be presented all at the same time.
Consolidation point	The point at which the different parts of the consignment are brought together or 'consolidated' in volume into the one consignment. A consolidation point, which may or may not be an export registered establishment, may be in a country location or located in close proximity to the wharf export registered establishment.
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 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.
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 (Plants and Plant Product) Rules 2021.  <b>Note:</b> The container approval is documented through a passed result recorded on the container inspection record.
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, stems, odour, pickling compounds, artificial colouring and other extraneous material.
Export Compliant Goods Storage (ECGS)	A receptacle approved by the department within a registered establishment where goods passed by an AO (export compliant goods) are stored prior to export. These goods remain passed for 28 days after the date of inspection.
Departmental requirements	Requirements for the export of prescribed plants and plant products stipulated by the department under the <i>Export Control Act 2020</i> , the Export Control (Plants and Plant Products) Rules 2021 and relevant instructional material.

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 occupier/operator of the ERE) must knowingly present 'compliant goods' to the AO for inspection, as required under the <i>Export Control Act 2020</i>.</p>
Exporter	The entity identified as the exporter in a notice of intention/request for permit to export.
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 permit	A permit issued by the department under chapter 7 of the <i>Export Control Act 2020</i> and required under the Export Control (Plant and Plant Product) Rules 2021 for the lawful export of prescribed plants and plant products.
Export Registered Establishment (ERE)	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.
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/or during loading. This may include the receipt, storage (when storing passed goods, or ECGS storages) treatment, inspection, conveyor systems and despatch areas.
Grain and plant products inspection record	<p>The approved form for an AO to record the findings and result of an inspection of prescribed grain and plant products for export.</p> <p><b>Note:</b> The grain and plant products inspection record includes PEMS and the equivalent manual record available on the PEOM.</p>
Infestation	<p>Presence of a living pest of the plant or plant product concerned.</p> <p><b>Note:</b> Infestation includes infection.</p>
Inspection authorised officer (AO)	<p>An AO approved to inspect plants, plant products, empty containers or empty bulk vessels for export.</p> <p><b>Note:</b> This role can be performed by Commonwealth, State or Territory, or third party AOs.</p>

Term	Definition
Inspection record	<p>The approved form for an AO to record the findings and result of an inspection of plants and plant products for export.</p> <p>See:</p> <ul style="list-style-type: none"> <li>• Grain and plant products inspection record</li> <li>• Bulk into ship hold inspection record</li> <li>• Bulk vessel loading running record.</li> </ul>
Importing Country Requirements	<p>Phytosanitary requirements outlined on an import permit and/or listed in Micor for a specific country that details the required conditions that need to be met before goods would be allowed entry into that country (this may involve phytosanitary certification).</p> <p>The department will not issue an export permit/phytosanitary certificate unless satisfied that the consignment complies with all importing country requirements (and is passed as export compliant by the AO).</p>
Manual of Importing Country Requirements (Micor)	A database maintained by the department that provides guidance on importing country requirements for a range of plants and plant products for export.
Mobile bulk loader	Portable handling equipment (for example, a belt conveyor, auger) used to load whole or split grain and seed, grain milling fractions and/or woodchips into a bulk vessel. Mobile bulk loaders are used as an alternative export pathway to fixed bulk terminals.
Notice of intention (NOI)	<p>The approved form submitted by an exporter to the department, containing information about prescribed goods they intend to export.</p> <p><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.</p>
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.

Term	Definition
Preparation	Processes required to ensure goods meet the phytosanitary requirements of the <i>Export Control Act 2020</i> and importing country requirements, prior to presenting the goods to the AO for inspection.  Information about the elements of 'preparation' can also be found in the Reference: <i>Prescribed Goods Export Preparation Standard Checklist</i> .
Prescribed goods (goods)	Goods that are listed in the Plant Rules to be prescribed goods for the purposes of the <i>Export Control Act 2020</i> . This includes: a) prescribed grains b) hay and straw c) fresh fruit d) fresh vegetables e) other plants or plant products for which a phytosanitary certificate or any other official certificate is required by an importing country authority.
Prescribed grain and plant products	Refer to Prescribed goods
Reference: <i>Prescribed Goods Export Preparation Standard Checklist</i> (the checklist)	A document that details elements of preparation required when preparing prescribed goods for export. The checklist must be completed for MBL consignments.
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.
Treatment	Official procedure for the killing, inactivation or removal of pests, or for rendering pests infertile or for devitalisation.
Unit of transport	A truck, trailer, conveyor, train carriage, vessel, shipping container or other container used to transport bulk goods.

## Legislative framework

The following list outlines the legislation that applies to the phytosanitary inspection of prescribed goods for export by an approved MBL operation.

- *Export Control Act 2020 (Act)* and Export Control (Plants and Plant Products) Rules 2021 (Plant Rules)
  - Section 2-1 Plant Rules – Plants and Plant Products that are prescribed goods
  - Sections 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 – Assessment of goods

- Section 410 of 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 by different people in this guideline.

Role	Responsibility
Audit and Assurance Group (AAG)	<ul style="list-style-type: none"> <li>● Liaise with the ERE occupier/operator regarding application process for MBL and refer ERE occupier/operator to GSEP for further information on the MBL application requirements and process</li> <li>● conduct an initial (pre-approval) audit of an establishment as part of the application process</li> <li>● undertake 'periodic' desk/site audits (including announced and unannounced) of the management system and the approved MBL Standard Operating Procedure (SOP)</li> </ul>
Clients/Exporters	<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 an 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>● presenting the consignment for inspection in an ERE</li> <li>● providing 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>● treatment of failed consignments, where applicable</li> <li>● requesting certification</li> <li>● maintaining status of goods until export</li> <li>● exporting goods within the validity period</li> <li>● meeting requirements of the checklist in association with the MBL operator applying to the department for approval to operate MBL</li> </ul>



Role	Responsibility
Authorised Officer (AO)	<ul style="list-style-type: none"> <li>ensuring they have the appropriate job functions 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, where applicable</li> <li>inspecting and verifying compliance of packaging material</li> <li>inspecting commodity flow path</li> <li>sampling the consignment</li> <li>conducting commodity inspection</li> <li>collecting pests and contaminants for identification</li> <li>recording and submitting inspection results</li> </ul>
Grain and Seeds Export Program (GSEP)	<ul style="list-style-type: none"> <li>liaising with the ERE regarding application process for MBL</li> <li>assisting the ERE with MBL application development and conduct desk assessment and review of MBL SOP as required</li> <li>approving MBL SOP and advising AAG for initial audit</li> </ul>
Export Registered Establishment occupier/operator (MBL operators)	<ul style="list-style-type: none"> <li>developing, maintaining and overseeing infrastructure and a management system to support the export of compliant goods via an approved MBL operation</li> <li>meeting requirements of the checklist (preparation)</li> <li>providing the checklist to the department at time of authorisation request</li> <li>organising a follow-up audit with AAG where the ERE or MBL operation has failed an audit</li> <li>applying to the department for approval to operate MBL</li> </ul>

## Introduction

This Guideline applies to Export Registered Establishments (EREs) approved by the department to sample and inspect prescribed goods for loading into a bulk vessel via a mobile bulk loader. EREs and their occupier/operators must meet strict prerequisites and ongoing audit requirements.

A Standard Operating Procedure (SOP) for the Mobile Bulk Loading (MBL) operation must be submitted to the department, along with the relevant application form/s and in accordance with the process outlined in the Guideline: [Management of Plant Export Registered Establishments](#). The department will assess and audit against the SOP for compliance with the legislation and the requirements of this guideline in advance of any approval of an MBL operation. Any changes to an existing MBL operation (and SOP) following approval and audit must be assessed by GSEP and AAG.

Depending on the individual MBL site and its operation, individual responsibilities outlined above may cross over between the client and the ERE occupier/operator.

### **Inspection by an authorised officer**

- Prescribed goods for export by an approved MBL operation must be inspected by an AO that has been appropriately trained, deemed competent and appointed by the department for the job function related to the product being inspected (see Reference: [Table of authorised officer job functions](#)).
- Inspections of prescribed goods for export by an approved MBL operations must be carried out in accordance with the Guideline and Work Instruction related to the product being inspected.

## **Mobile Bulk Loading modes of operation**

There are 2 approved modes of MBL and, unless stated otherwise, all requirements of this guideline apply to both modes. Process maps for these 2 modes are available in Attachments 2 and 3.

### **1. Mobile bulk loading – AO inspection at the point of export**

This mode of operation involves the export of prescribed goods where the goods are screened, then sampled and inspected by an AO at the point of export (wharf).

- The wharf where the mobile bulk loader is in operation must be an ERE.
- The ERE occupier/operator must have determined that prescribed goods are compliant prior to presenting them to the AO for final export inspection. If information about goods being compliant from the upcountry consolidation point is not available then the ERE occupier/operator must do their own checks prior to presenting goods to the AO.
- The goods and flowpath at the ERE (mobile bulk loader), including any machinery used to move compliant goods, must be inspected by an AO and passed as part of the flowpath inspection before goods can be loaded into the bulk vessel.
- The goods must be passed through a screen to remove any large contaminants before the AO sampling point.
- An AO must pass the flow path from the AO sampling point to the point of loading including any machinery used to move the goods.
- Goods must be inspected by an AO and 'passed as export compliant' before they can be loaded into the vessel for export.
- The export compliant goods must be loaded into a vessel using an approved mobile loader.

### **2. Mobile bulk loading – AO inspection at upcountry site/s**

This mode of operation involves the transport of goods inspected and passed by an AO as export compliant goods, from an ERE (not located at wharfside) to the wharf for loading into a bulk vessel using a mobile bulk loader.

- Both the wharf loading site, and the upcountry site/s (where the goods are inspected by an AO and loaded for transport to the wharf) must be an ERE.
- The goods and flowpath, including any machinery used to move export compliant goods (including trucks and mobile bulk loader) must be inspected by an AO and passed before goods can be loaded into the bulk vessel.
- For this mode of operation flow path checks must be done by the AO at 2 sites—the upcountry ERE and at the wharf ERE loading site.
- The goods must be passed through a screen (before the point of sampling for AO) at the up country ERE to remove any large contaminants.

- An AO must pass the flow path at the up country ERE from the point of sampling to the point of loading, including the empty trucks.
- An AO must also pass the flowpath at the wharf ERE from the point of discharge from trucks to the point of export.
- Trucks must be covered and sealed after AO inspection at up country ERE.

## Prerequisite and application requirements

- ERE occupier/operators wanting to apply to use a Mobile Bulk Loading (MBL) operation must submit an application along with their Standard Operating Procedure (SOP) detailing their MBL operations to the department. For more information on the application process for MBL see Application Requirements.
- If you have any questions about your application, prerequisite requirements or the required SOP, contact [Grain and Seed Exports Program](#) (GSEP).
- The application must include details of the export registered establishment (ERE), receipt and operational preparation procedures as required by the checklist at all relevant sites, including where goods will be inspected by an AO (refer also to attachment 1).
- ERE occupier/operators that have been issued major corrective actions at the time of seeking approval for MBL will be considered once Corrective Action Request (CAR) has been closed out.
- Occupier/operators of newly registered EREs are eligible to apply for MBL and must follow the application requirements below.
- All SOPs for MBL must be of a standard deemed suitable by the department, this will ensure it meets the minimum requirements of a foreign country audit process.

## Prerequisite requirements

Prerequisite requirements for MBL are listed in this section. Only EREs that meet the following mandatory requirements are eligible to apply for MBL.

ERE occupier/operators must have all systems and processes documented and be able to meet all requirements of the Reference: [Prescribed Goods Export Preparation Standard Checklist](#) (the checklist) for each consignment.

## Export Registered Establishment

It is acknowledged that some aspects of preparation may occur throughout the supply chain; however, final preparation and presentation for assessment of the goods by an AO prior to export must take place at an establishment registered under the *Export Control Act 2020* that otherwise meets all the requirements of the legislation as an ERE.

- For [MBL – AO inspection at the point of export](#), only the wharf premises is required to be an ERE.
- For [MBL – AO inspection at upcountry site/s](#), the upcountry site, and the wharf premises where the goods are to be loaded onto the vessel must both be EREs. Information on the EREs must be included in the application.

The ERE occupier/operator must ensure that requirements of the checklist have been met and provide this document to the department at time of authorisation request.

## Sourcing goods that are compliant with export requirements

EREs involved in MBL are responsible for ensuring that measures have been implemented to ensure that goods sourced from upcountry/off-site storages meet importing country requirements and requirements of Australian export legislation (are compliant goods) prior to presenting the goods for inspection by the AO. These measures will occur at the upcountry ERE or consolidation point and must be documented as part of normal ERE requirements for assembling a cargo.

The MBL SOP must describe how traceability of each consignment is maintained. Documents relating to the sourcing of grain for export (like other aspects of preparation according to the checklist) will be subject to audit as required.

Goods can be determined as compliant by:

- representative sampling methods as outlined in the relevant industry standards; with documented sampling procedures, training and training records.
- classification and inspection for legislated contaminants (as per Micor, import permits, Australian legislation, and the like) and results for individual units maintained, for example, results for each truck load.

Where goods are confirmed as compliant at an upcountry consolidation point (that is not an ERE), this location and source locations may also be subject to audit if a non-compliance is identified or at any other time as determined by the department.

### **Screening**

All MBL operations must have an adequate screening system in place at an ERE located before the AO phytosanitary sampling point.

The screen must be of a size adequate to screen out large contaminants and meet importing country requirements. Generally, this must be 25 mm x 25 mm (for wheat, oats and barley) or appropriately sized for larger commodities.

### **Sampling and testing prior to AO inspection**

Under the *Export Control Act 2020*, exporters and grain handlers are responsible for presenting compliant goods. All goods must be subject to quality and phytosanitary inspection and testing (that is, in accordance with the relevant standards), and determined to be compliant prior to presentation to AOs for government phytosanitary sampling and inspection.

All phytosanitary sampling and inspection points must comply with departmental requirements for sampling, inspection and rejection outlined in the relevant legislation, guidelines and work instructions.

### **Transportation and storage**

- Goods must be transported, stored and handled in a manner that maintains the quality and phytosanitary status of the goods and ensures that they do not become contaminated or infested prior to presentation to the AO at the ERE.
- The ERE occupier/operator must maintain transportation and storage records.
- Trucks transporting goods passed as export compliant (at an upcountry ERE) by an AO must be covered and secured with a seal/s applied following loading and prior to leaving the ERE on route to the wharf ERE.
- Transportation and storage records for the movement of goods up to the point of loading (the vessel) must be kept by the ERE occupier/operator in control of the operation. Records must include, but are not limited to
  - seal number
  - date and time
  - truck registration number
  - source
  - tonnage.

### **Equipment Use**

- Any equipment used at the ERE must be maintained in a manner to prevent contamination of goods.

- Equipment and transport units must be able to be visually inspected.
- Hygiene maintenance records of equipment and transport units must be kept.
- A general outline of the hygiene and equipment maintenance process must be detailed in the SOP.

### **Hygiene and Pest Control**

- An approved, documented and auditable hygiene, waste and pest control program for the ERE must be outlined as part of the SOP.
- The ERE occupier/operator must maintain records of hygiene, waste and pest control measures/activities undertaken (including any equipment used).
- The hygiene, waste and pest control program must be documented and is subject to audit by the department.

**Refer to** the Guideline: [Management of plant export registered establishments](#) for further information on general requirements.

### **Work Health and Safety**

The ERE occupier/operator must have a defined work health and safety policy with documented procedures to ensure the safety and health of staff and visitors.

### **Rejection Procedures and Contingency Arrangements**

SOPs must include documented rejection procedures for all non-compliant goods, including rejection of goods which were consolidated at an off-site/up-country storage. This procedure must be included as part of the MBL application process and approved by the department.

- Goods must be rejected as per the rejection procedures outlined in the relevant instructional material on the [Plant Export Operations Manual](#).
- All grain/goods must be traceable to the previous consolidation point/storage/upcountry site, including specific silo or bunker storage identification (that is, a truck is not the source).
- The SOP must demonstrate how traceability of each consignment is maintained and how rejection of a source is recorded.
- Systems must also be in place to manage goods in transport units (for example, trucks), particularly where there has been a rejection of source—where there may be multiple transport units on the road at any one time.
- The ERE occupier/operator must have a documented procedures for diverting non-compliant goods so they do not compromise the integrity of export compliant goods or of the previously inspected and approved equipment and facilities.

### **Documented Inventory System**

The ERE occupier/operator must maintain accurate records and traceability for all receivals, treatments, outturn, and operational processes through the facility. This is particularly important for tracing of source and managing rejections/tonnages and the like.

### **Sampling System**

Details of the mobile bulk loader and automatic sampler must be provided as part of the application.

- The sampling system must meet the requirements of the legislation to ensure a minimum sample of 2.25 litres per 33.33 tonnes is being presented to the AO for inspection.
- Sampling for grain and seed must be via an automatic sampling system that is calibrated at a minimum, annually.
- Operation of the automatic sampler must be demonstrated to the department to confirm that the correct sample amount can be delivered (at normal/expected load rates). Demonstration is required prior to final approval of the SOP and MBL operation. Any changes to the

loader/sampler after approval will require demonstration of the sampling system to re-confirm its operation.

## Application Requirements

### Application

- The occupier/operator of an ERE seeking approval for MBL must submit an application to the [department](#).
- General application requirements and processes for submitting applications are detailed in the Guideline: [Management of plant export registered establishments](#).
- A SOP for the MBL operation must cover, to the satisfaction of the department, all points listed in the [prerequisite requirements](#) and address any operational risks.
- Compliance with the checklist must be noted in the application.

### Layout of the Establishment

An aerial map showing the ERE site/s in relation to the local area and a site map of the establishment showing locations of main features including any consolidation points, sampling and inspection points, location of screens and mobile loading equipment at wharf, must accompany the application.

- For [MBL – AO inspection at upcountry site/s](#), an aerial and site map must be provided for all EREs in the operation.
- For [MBL – AO inspection at the point of export](#), an aerial and site map must be provided for the ERE wharf site.

### Process Flow

An aerial plan or site map showing all processes, inspection points, truck movement/path, including flow of rejected goods, for all EREs involved in the MBL operation must be included with the application.

## Audit

Audits of MBL operations will be conducted in accordance with the Guideline: [Audit of plant export registered establishments](#). Sites already operating as an ERE must be subject to an initial (pre-approval) audit as part of the MBL application process. Additionally, the ERE must be subject to a full audit within 6 months following approval of a SOP and commencement of MBL operations.

Audits will include a review of the EREs MBL operations and procedures to verify that the ERE continues to meet the requirements of the approved SOP and the checklist, and general ERE requirements.

### Audit Types

A combination of the initial audit, plus periodic (announced and unannounced) audits will be used to monitor compliance in line with the Guideline: [Audit of plant export registered establishments](#).

## Non-Compliances

Non-compliances may result in the review, suspension and revocation of the MBL operation. Processes for suspensions, variations and revocations of establishment registration initiated by the Secretary/delegate (including as a result of non-compliances) are outlined in Guideline: [Management of plant export registered establishments](#).

### Suspension of mobile bulk loading operation

Suspension of an MBL operation may be given where the department has reasonable grounds to believe that requirements according to legislation that may impact on the integrity of the goods are not being met.

For details on the suspension process please refer to information in the Guideline: [Management of plant export registered establishments](#).

## Reinstatement of suspended entities

MBL operations suspended due to failing an audit will only be reinstated if the ERE passes a follow-up audit. It is the responsibility of the occupier/operator of the ERE/MBL operation to organise a follow-up audit with AAG to demonstrate the reason for the suspension has been rectified.

## Cancellations, change of ownership or MBL operations

The ERE occupier/operator must notify the department of any changes to the scope of the approved MBL operation.

- Any unauthorised changes to the operation or management of the ERE may result in cancellation or suspension of the MBL and the ERE occupier/operator would be required to apply for re-registration.
- Any change in the operators or ownerships of the ERE must be provided to the [department](#) in writing as described in Sections 'Changes in circumstances' and 'Cancellation of registration by the occupier' in the Guideline: [Management of plant export registered establishments](#).
- When the status of an ERE with approved MBL has been cancelled or suspended, all use of MBL must cease immediately.
- Any changes to an existing MBL operation (and SOP) following approval and audit must be assessed by GSEP and AAG as described in the Section 'Variations, suspensions and revocation of registration, operations or functions' in the Guideline: [Management of plant export registered establishments](#).

## Record keeping

- Departmental officers must keep official files in accordance with the department's record keeping policy. All documentation must be version controlled.
- Where documents are not available in PEMS; clients, registered establishments and AOs must retain documentation for a period of at least 2 years.
- ERE occupier/operators must retain all documentation, including but not limited to applications, registrations, renewals, suspension, revocations and audits 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).
- Micor Plants (importing country requirements, protocols and work plans)
- Protocols, work plans
- [Plant Export Operations Manual](#)
  - Guideline: *Management of plant export registered establishments*
  - Guideline: *Audit of plant export registered establishments*
  - Guideline: *Inspection of prescribed grain and plant products for export*
  - Guideline: *Inspection of forest products for export*
  - Work Instruction: *Inspecting prescribed grain and plant products*
  - Work Instruction: *Inspecting forest products for export*
  - Reference: *Prescribed Goods Export Preparation Standard Checklist*
  - Reference: *Table of authorised officer job functions*

## Contact information

- Audit and Assurance Group: [AuditServices@aff.gov.au](mailto:AuditServices@aff.gov.au)
- Authorised Officer Hotline: 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

## Document information

The following table contains administrative metadata.

Instructional Material Library document ID	Instructional material owner
IMLS-9-7083	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	10/08/2020	First publication of this guideline.
2.0	27/03/2021	Updates for the commencement of the <i>Export Control Act 2020</i> and associated Export Control (Plants and Plant Products) Rules 2021.
3	24/11/2023	Updated phrasing regarding ERE responsibilities.



# **Attachment 1: Sample of Standard Operating Procedures for the application of MBL**

## **Cover page**

Must include:

- business/company name
- contact details
- physical address
- postal address
- name of designated contact

## **Table of contents**

Document the contents of the SOP

## **Introduction/Purpose**

Provide a brief overview of the intended purpose of the SOP. This must include, but is not limited to:

- scope
- definitions
- establishment responsibilities and/or management responsibilities.

## **Export registered establishment/s**

Specific information on the site's operational procedures. This must include, but is not limited to:

- hygiene
- pest control
- WHS
- security
- maintenance
- site access.

## **Sampling and testing prior to AO inspection**

Document the sampling and quality/phytosanitary procedures in place prior to grain being sampled and inspected by the AO. This may be addressed in the Reference: [Prescribed Goods Export Preparation Standard Checklist](#).

## **Transportation and storage**

- Detailed records of the movement of goods from offsite consolidation storage to the MBL facility and onsite storage (if any).
- Must include details about how phytosanitary status is maintained, such as the process for sealing of trucks for upcountry EREs.

## **Transportation hygiene**

- Documented procedure of how transport units (trucks, trailers, containers, train wagons) are deemed adequate to transport consumable goods.
- Detail inspection and cleaning processes.

## **Screening**

Include information on the method used to screen the goods before AO sampling, inspection and subsequent loading.

## **Equipment and use**

Detailed information on any equipment used in the process of loading, transporting, sampling and inspecting goods, including maintenance and hygiene records.

## **AO sampling and inspection of goods**

Detailed information on how the sampling process and inspection system will operate (must meet 2.25 litres per 33.33 tonnes) during the loading of the goods.

## **Rejection procedures and contingency arrangements**

Detailed information on the process for rejecting goods. Include rejection procedures for transportation units and upcountry source/stockpile rejections.

## **Re-presentation procedures**

Document the procedures in place for the re-inspection of previously failed goods. Include verification of treatment certificates.

## **Traceability**

All goods must be traceable to the source, including specific silo or bunker storage identification whilst in storage.

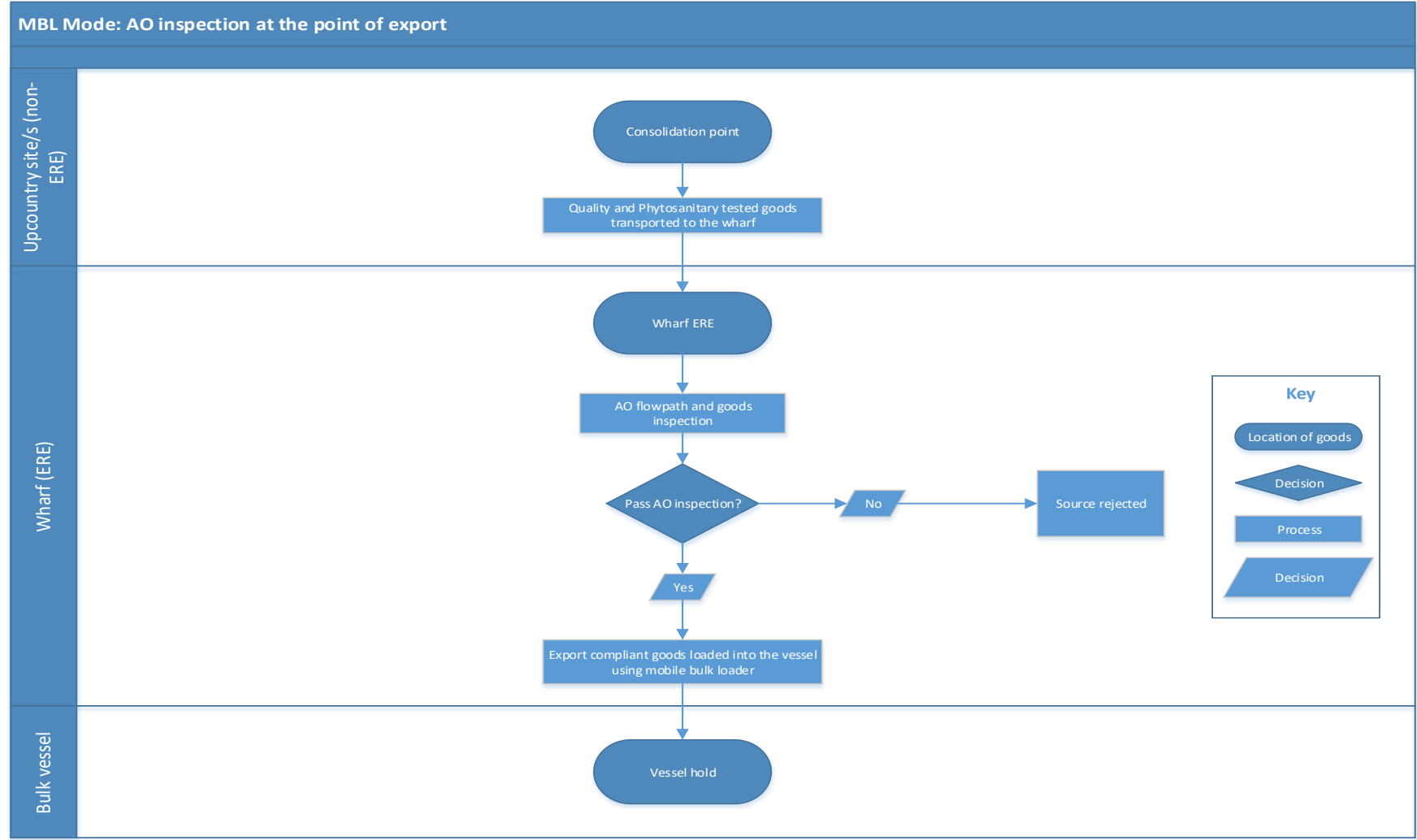
Document the procedures used to demonstrate how traceability of each consignment is maintained and how rejection of a source is recorded.

Traceability of goods must be maintained. It is the responsibility of the ERE occupier/operator to maintain accurate traceability records, which may be required at audit.

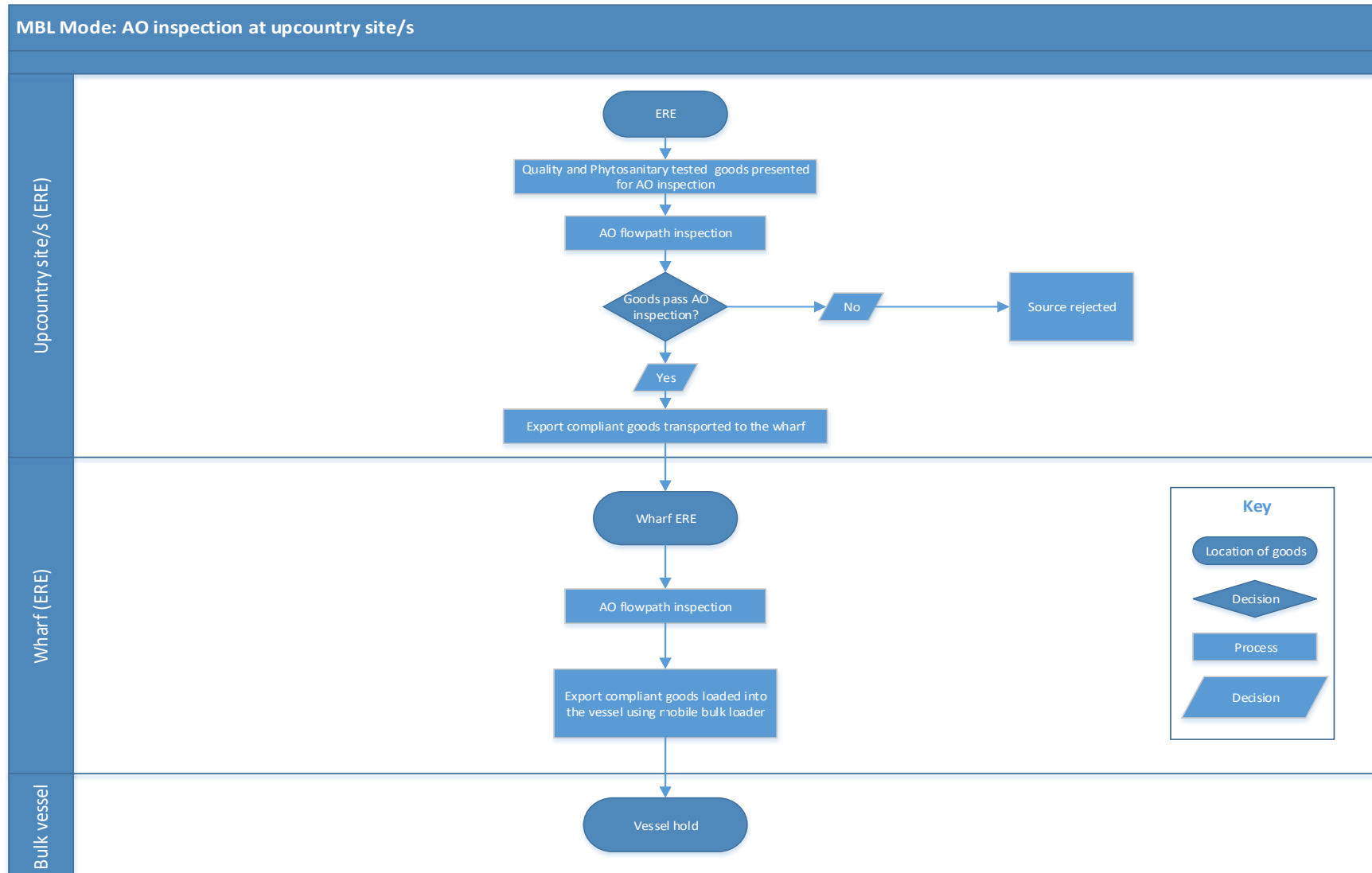
## **Changes in ownerships or operations**

Describe how changes in management or changes to the approved SOP/grain management system will be conveyed to the department.

Attachment 2: Process Map AO Inspection at Wharf EREs



### Attachment 3: Process Map AO inspection at upcountry EREs



This is a CONTROLLED document. Any documents appearing in paper form are not controlled and should be checked against the IML version prior to use.