



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

Exports process instruction

Audit of plant export registered establishments

Direction to staff

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

Purpose of this document

This document details the policy and process for the audit of plant export registered establishments (RE). It includes:

- audit principles
- audit performance standards
- audit types
- audit process
- non-compliance ratings
- review process.

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Policy statement

The policy, overarching framework and legislation related to this Exports process instruction can be found in the Exports policy: [Audit of plant export operations](#).

Roles and responsibilities

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

Role	Responsibility
Audit and Assurance Branch (AAB)	<ul style="list-style-type: none"> Receiving matters of RE non-compliance to review. Determining future action to address non-compliances. Making recommendations on whether to vary, suspend or revoke a RE's registration or registered functions/operations.
Auditor (AAB)	<ul style="list-style-type: none"> Scheduling audits. Auditing REs against the departmental performance standards and importing country requirements in accordance with this Exports process instruction. Preparing the audit report. Notifying establishment occupier of audit outcomes by providing the audit report. Recording audit results and filing audit documents. Issuing advisory findings and non-compliance notices. Determining the review date for advisory findings and non-compliance notices, including managing requests for extension. Referring critical non-compliances to the AAB delegate.
Business Systems Program (BSP), Plant Exports Branch	<ul style="list-style-type: none"> Maintaining performance standards for plant export REs. Determining the independent delegate for any appeals of decisions. Provide the outcome of an appeal of decision to AAB and the applicant on behalf of the delegate, where required.
Delegate (Assistant Secretary, Plant Exports Branch)	<ul style="list-style-type: none"> Reviewing appeals of decisions where they were not the delegate for the decision being appealed. Provide the outcome of a decision, or appeal of decision, to the applicant.
Grain and Seed Exports Program (GSEP), Plant Exports Branch	Maintaining grain and plant product registered function performance standards and checklists.
Horticulture Exports Program (HEP), Plant Exports Branch	Maintaining horticulture registered function performance standards and checklists.
Meat Exports Branch, Documentation and Registration	<ul style="list-style-type: none"> Maintaining the Establishment Registration database. Issuing Certificates of Registration.

Role	Responsibility
Occupier (RE occupier)	<ul style="list-style-type: none">• Complying with Australian export laws.• Meeting departmental performance standards.• Maintaining records.• Being available for audit.• Providing requested documentation.• Taking necessary action to address non-compliance.• Providing evidence that non-compliances have been addressed.• Providing submission to support appeal of decision when appropriate.

Work health and safety

Auditors must:

- comply with applicable Commonwealth, state and territory work health and safety (WHS) legislation
- comply with the department's WHS policy and procedures
- read and be familiar with the Exports reference: [Work health and safety in the plant export environment](#)
- not enter work sites unless it is safe, wear required personal protective equipment (PPE) and consider any WHS hazards
- 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

Auditors 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 sleeve clothing
- thermal clothing (for cold rooms)
- safety glasses
- face mask
- first aid kit
- portable gas detector
- water
- sunscreen
- emergency communication equipment (such as a phone carrier with coverage or satellite phone).

WHS reporting requirements

All WHS incidents, near misses, and any hazards must be reported to the department and entered in SIRUS (WHS information system).

Performance standards

All registered establishments must be audited for compliance against a set of performance standards derived from the requirements outlined in the Exports policy: [Management of plant export registered establishments](#), relevant legislation and importing country requirements.

Elements

Performance standards are organised into groups known as elements. Each element has several sub-elements that must be assessed for compliance.

The elements for REs are:

- record keeping
- plans and specifications
- hygiene
- pest control
- structural requirements.

Refer to Exports reference: [Performance standards for plant export registered establishments](#).

Recognition of food safety certification for fresh fruit and vegetables (horticulture only)

Current food safety certification to a Global Food Safety Initiative (GFSI) benchmarked scheme may be recognised as evidence in meeting some of the documentation requirements associated with pest control, hygiene and waste management.

In Australia, the GFSI benchmarked fresh produce food safety schemes are:

- GLOBAL G.A.P.
- Freshcare
- British Retail Consortium (BRC)
- Safe Quality Food (SQF).

These schemes are also recognised under the [Harmonised Australian Retailer Produce Scheme \(HARPS\)](#).

To obtain recognition of existing food safety certification, the RE must provide evidence of current certification to a GFSI benchmarked food safety and quality scheme or a certificate extension notice at audit.

Current certification is defined as valid if it has:

- not expired
- been issued by a third-party, Joint Accreditation System of Australia and New Zealand (JAS-ANZ) accredited audit certification body.

Where evidence of current certification is not provided or there is visual evidence of non-compliance with export regulatory requirements, all areas must be audited against the full performance standards, and prior recognition will not apply.

Registered functions

Registered functions may have their own performance standards that need to be assessed in addition to the registered operations performance standards.

Specific import country and commodity requirements for horticulture can be found in the relevant protocol and workplans located in the Document section of [Manual of Importing Country Requirements \(Micor\)](#).

Treatments

The elements for horticulture protocol treatment functions are:

- structural and treatment equipment requirements
- procedures
- verification of treatment
- phytosanitary security measures
- documentation.

Refer to:

- Exports reference: [Performance standards – onshore cold treatment – horticulture exports](#)
- Exports reference: [Performance standards – vapour heat treatment – horticulture exports](#)
- Exports reference: [Performance standards – irradiation treatment – horticulture exports](#)
- Exports reference: [Performance standards – dimethoate dipping – horticulture exports](#)
- Exports reference: [Performance standards – methyl bromide fumigation – horticulture exports](#)
- Exports reference: [Performance standards – sulfur dioxide carbon dioxide fumigation – horticulture exports.](#)

Handling fruit fly Pest Free Area (PFA) product outside of a PFA

The elements for handling PFA product outside of a PFA are:

- structural requirements
- processes
- phytosanitary security measures
- documentation.

Refer to Exports reference: [Performance standards – handling fruit fly PFA product outside of a PFA.](#)

Packing product post-treatment or PFA product outside of a PFA

The elements for packing product post-treatment or PFA product outside of a PFA are:

- general requirements
- structural requirements
- processes
- phytosanitary security
- documentation.

Refer to Exports reference: [Performance standards – packing product post-treatment or Pest Free Area \(PFA\) product outside of the PFA.](#)

Washing potatoes for export to the Republic of Korea

Refer to Exports reference: [Performance standards – washing potatoes for export to the Republic of Korea.](#)

Export Compliant Goods Storage (ECGS)

- Occupiers of ECGS REs must comply with the requirements in the Exports process instruction: [Export compliant goods storage](#) and the Exports reference: [Export compliant goods storage](#).
- ECGS must be audited as part of the periodic RE audit.
- Audits must include a complete review of the RE's ECGS operations and procedures to verify that the RE continues to meet ECGS requirements.

Refer to Exports reference: [Performance standards - Export compliant goods storage](#).

Mobile bulk loading (MBL)

- Occupiers of MBL REs and operations must comply with the Exports process instruction: [Mobile bulk loading of prescribed goods for export](#).
- Sites already operating as a RE must be subject to an initial (pre-approval) audit as part of the MBL application process. Additionally, the RE must be subject to a full audit within 6 months following approval of a Standard Operating Procedure (SOP) and commencement of MBL operations. From then on MBL is audited as part of the periodic RE audit.
- Audits must include a review of the RE's MBL operations and procedures to verify that the RE continues to meet MBL requirements.

Refer to Exports reference: [Performance standards – Mobile bulk loading](#).

Quality Systems Recognition (QSR)

- Occupiers of QSR REs must comply with the Exports process instruction: [Quality system recognition of highly processed plant products for export](#).
- QSR REs must be audited within 3 months of initial approval of the QSR registered function.

Refer to Exports reference: [Performance standards – Quality system recognition](#).

Automatic in-line hay sampling (AIHS)

- Occupiers of AIHS REs must comply with the Exports process instruction: [Inspection of hay and straw for export](#).
- AIHS registered function audits should be run concurrent with the RE audit.

Refer to Exports reference: [Performance standards – Automatic in-line Hay Sampling](#).

Inspection of logs to China

Occupiers of REs registered for the inspection of logs with or without bark to China must comply with the Exports process instruction: [Inspection of forest products for export](#).

Refer to Exports reference: [Performance standards – Establishment start up audits for log exports to China](#) & [Performance standards – Establishment continuation audits for log exports to China](#).

Fumigation of logs to China

Occupiers of REs registered for the fumigation of logs to China with bark must comply with Exports process instruction: [Inspection of forest products for export](#).

Refer to Exports references: [Performance standards – Establishment start up audits for log exports to China](#) & [Performance standards – Establishment continuation audits for log exports to China](#).

Audit types

The following table lists audit types for REs.

Audit type	Conducted	Frequency	Announced/ unannounced
Initial audit	<ul style="list-style-type: none"> after an application to register an establishment is received by the department and prior to the establishment being registered after an application to add a registered operation or function is received by the department and prior to the operation or function being approved. <p>Note: Where treatment functions are part of the audit scope, the treatments must be demonstrated during the audit.</p>	once	announced
Periodic audit	<p>Following the initial audit, on an ongoing basis to ensure continued compliance with applicable performance standards.</p> <p>Note: Where treatment functions are part of the audit scope, the treatments must be demonstrated during the audit.</p>	<p>minimum of once every 12 months.</p> <p>Except for:</p> <ul style="list-style-type: none"> new treatment functions, which must be reaudited within 3 months of the initial audit and approval newly registered establishments, which must be reaudited within 6 months of the initial registration newly registered functions for inspection and fumigation of logs to China which must be reaudited within 6 months of the initial registration. <p>Note: The frequency of audit may be higher, depending on non-compliance.</p>	announced or unannounced

Audit process

Initial audit

- Occupiers of establishments applying for registration or seeking to add operations or functions to their registration must be audited to assess their ability to comply with the relevant performance standards before the application is approved by the department.

- The occupier as well as any other relevant persons, such as treatment operators, must be present at the audit.

Issuing advisory findings

If a non-compliance is detected during an initial audit, the auditor must issue an advisory finding per sub-element. Each advisory finding must:

- describe the identified non-compliance
- be issued in writing by auditors immediately upon completing the audit
- specify a deadline for rectification, which must not be longer than 14 calendar days.

Note: Where the applicant requires longer than 14 days to rectify the issue/s they must request an extension in writing from the auditor prior to the review date. Deadlines for rectification can be extended up to twice.

The following table outlines the process for conducting an initial audit of an establishment.

Stage	What happens	Responsible party						
1.	A review is conducted on the application and documented systems provided by the occupier of the establishment to determine if an on-site audit can occur.	Auditor						
	<table><tr><th>If the establishment is...</th><th>Then...</th></tr><tr><td>ready to proceed to audit</td><td><ul style="list-style-type: none">the auditor schedules an audit with the occupier.go to Stage 2.</td></tr><tr><td>not ready to proceed to audit</td><td><ul style="list-style-type: none">refer to the Exports process instruction: Administering applications for plant export registered establishmentsprocess ends here.</td></tr></table>		If the establishment is...	Then...	ready to proceed to audit	<ul style="list-style-type: none">the auditor schedules an audit with the occupier.go to Stage 2.	not ready to proceed to audit	<ul style="list-style-type: none">refer to the Exports process instruction: Administering applications for plant export registered establishmentsprocess ends here.
	If the establishment is...		Then...					
	ready to proceed to audit		<ul style="list-style-type: none">the auditor schedules an audit with the occupier.go to Stage 2.					
not ready to proceed to audit	<ul style="list-style-type: none">refer to the Exports process instruction: Administering applications for plant export registered establishmentsprocess ends here.							
2.	An entry meeting is conducted on-site with the occupier of the establishment to outline the objectives, scope and process of the audit; and to confirm the activities to be undertaken.	<ul style="list-style-type: none">AuditorOccupier						
3.	Copies of all required documentation are provided to the auditor. Documents may include: <ul style="list-style-type: none">pest control program and recordshygiene program and recordswaste program and recordstraceability and phytosanitary security systemstransfer recordsequipment maintenance and calibration recordstraining program and recordstreatment procedures and records.	Occupier						
4.	A site inspection is completed, and compliance is assessed against the performance standards.	Auditor						

Stage	What happens	Responsible party								
5.	An exit meeting is conducted by the auditor with the occupier or relevant person to present the audit findings including identified non-compliances and further actions required. Note: Where several non-compliances are found at audit, the auditor can defer the presentation of the findings if required.	<ul style="list-style-type: none">• Auditor• Occupier								
	<table><tr><th>When non-compliances are...</th><th>Then...</th></tr><tr><td>identified and can be reasonably addressed within 14 days</td><td><ul style="list-style-type: none">• advisory findings are issued• go to Stage 6.</td></tr><tr><td>identified and cannot be reasonably addressed</td><td><ul style="list-style-type: none">• the establishment is deemed not compliant• issue an audit report with a fail result within 10 business days• refer to the Exports process instruction: Administering applications for plant export registered establishments• process ends here.</td></tr><tr><td>not identified</td><td><ul style="list-style-type: none">• the establishment is deemed compliant• issue an audit report with a pass result• refer to the Exports process instruction: Administering applications for plant export registered establishments• process ends here.</td></tr></table>		When non-compliances are...	Then...	identified and can be reasonably addressed within 14 days	<ul style="list-style-type: none">• advisory findings are issued• go to Stage 6.	identified and cannot be reasonably addressed	<ul style="list-style-type: none">• the establishment is deemed not compliant• issue an audit report with a fail result within 10 business days• refer to the Exports process instruction: Administering applications for plant export registered establishments• process ends here.	not identified	<ul style="list-style-type: none">• the establishment is deemed compliant• issue an audit report with a pass result• refer to the Exports process instruction: Administering applications for plant export registered establishments• process ends here.
	When non-compliances are...		Then...							
	identified and can be reasonably addressed within 14 days		<ul style="list-style-type: none">• advisory findings are issued• go to Stage 6.							
	identified and cannot be reasonably addressed		<ul style="list-style-type: none">• the establishment is deemed not compliant• issue an audit report with a fail result within 10 business days• refer to the Exports process instruction: Administering applications for plant export registered establishments• process ends here.							
not identified	<ul style="list-style-type: none">• the establishment is deemed compliant• issue an audit report with a pass result• refer to the Exports process instruction: Administering applications for plant export registered establishments• process ends here.									
6.	Evidence of compliance is provided to the auditor by the occupier by the review date.	Occupier								

Risk Rating: Medium

Stage	What happens	Responsible party						
7.	<p>The non-compliance is reviewed by the auditor against the evidence provided by the occupier.</p> <table><tr><th>When the evidence provided is...</th><th>Then...</th></tr><tr><td>satisfactory</td><td><ul style="list-style-type: none">the establishment is deemed compliantupdate the advisory finding with no further action requiredissue an audit report with a pass resultrefer to the Exports process instruction: Administering applications for plant export registered establishmentsprocess ends here.</td></tr><tr><td>not satisfactory</td><td><ul style="list-style-type: none">the establishment is deemed not compliantissue an audit report with a fail result within 10 business daysrefer to the Exports process instruction: Administering applications for plant export registered establishmentsprocess ends here.</td></tr></table>	When the evidence provided is...	Then...	satisfactory	<ul style="list-style-type: none">the establishment is deemed compliantupdate the advisory finding with no further action requiredissue an audit report with a pass resultrefer to the Exports process instruction: Administering applications for plant export registered establishmentsprocess ends here.	not satisfactory	<ul style="list-style-type: none">the establishment is deemed not compliantissue an audit report with a fail result within 10 business daysrefer to the Exports process instruction: Administering applications for plant export registered establishmentsprocess ends here.	Auditor
When the evidence provided is...	Then...							
satisfactory	<ul style="list-style-type: none">the establishment is deemed compliantupdate the advisory finding with no further action requiredissue an audit report with a pass resultrefer to the Exports process instruction: Administering applications for plant export registered establishmentsprocess ends here.							
not satisfactory	<ul style="list-style-type: none">the establishment is deemed not compliantissue an audit report with a fail result within 10 business daysrefer to the Exports process instruction: Administering applications for plant export registered establishmentsprocess ends here.							

Periodic audits

Full scope audits

- REs must be subject to a minimum of one periodic audit within every 12 months against the relevant performance standards for all their registered operations and functions.
- New REs must be audited within 6 months of their registration being approved or within 3 months if they have a treatment function. Following this, the audit frequency must revert to a minimum of every 12 months depending on their audit results.
- REs may be audited at any time during their registration.

Notes:

- Non-compliant REs may be subject to an increased audit frequency of every 3 or 6 months.
- Evidence of non-compliant export consignments may trigger an audit of the RE. For more information, see [Non-compliance detected outside of an audit](#).

Partial scope audits

- For establishments on an increased audit frequency of 3 or 6 months, the scope of the additional audits may cover some or all registered operations and functions depending on what they have previously received non-compliance notices for.

- Where non-compliance notices have been issued against the registered operation performance standards during the full scope audit, the next audit cannot be a partial scope audit. All operations and functions must be reassessed.
- Where non-compliance notices have been issued against registered functions only, but all registered operation performance standards are compliant, the next audit (where it occurs within 3 or 6 months) can be a partial scope audit.

For example: An establishment has a registered operation to inspect fresh fruit and registered functions to conduct fumigation and onshore cold treatment. During the periodic full scope audit, non-compliance notices are issued against the fumigation performance standards only, resulting in an increased audit frequency. The scope of the next audit can be limited to the fumigation function with the inspection operation and onshore cold treatment function to be audited again within 12 months of the full scope audit.

- Where a partial scope audit overlaps with the timing of the annual full scope audit, the audits can be combined into one full scope audit.
- Operations or functions included in a partial scope audit must be assessed in their entirety against all the performance standards for that operation and/or function.
- The results of partial scope audits must be assessed against the [compliance matrix](#). Where the result of the partial scope audit is
 - a 'pass', then the next audit must occur at the scheduled 12 month audit
 - 'acceptable' or 'marginal', the next audit must be within 3 or 6 months.

Auditing registered functions

When registered functions form part of the audit scope, all non-compliances found at audit must be applied to the [compliance matrix](#) and used to determine the audit result and next audit timeframe.

Refer to the Exports policy: [Management of a plant export registered establishment](#) for more information on registered functions.

Treatments (horticulture protocol markets only)

- All new treatment registered functions must be audited within 3 months of the initial audit to ensure compliance.
- The audit schedule will continue based on performance and will occur within every 12 months.
- Auditors must observe the key steps of the treatment process. This may include, but is not limited to
 - preparation
 - loading
 - calibration
 - monitoring
 - analysis of data.

Note: Treatments that have systems continuously monitoring the treatment process, for example, cold treatment and vapour heat treatment, only require an audit during preparation, calibration and loading. The monitoring and recalibration data can be provided as evidence of a successful treatment once completed.

- The department may audit a treatment facility when
 - major changes are made to the systems that were approved at the initial audit including:
 - changes in management that substantially affects any aspect of the treatment process

- operational or structural changes that substantially affect the treatment function of the establishment
- there is evidence of a possible treatment failure or non-compliant documentation.
- Importing countries may reserve the right to audit approved facilities under agreed protocols.

Process for conducting a periodic audit

The following table outlines the process for conducting a periodic audit of a RE.

Stage	What happens	Responsible party						
1.	Audits are scheduled.	Auditor						
	<table><tr><th>When the audit is to be...</th><th>Then the occupier of the RE is...</th></tr><tr><td>announced</td><td>contacted to schedule the audit.</td></tr><tr><td>unannounced</td><td>contacted with minimal notice, if at all.</td></tr></table>		When the audit is to be...	Then the occupier of the RE is...	announced	contacted to schedule the audit.	unannounced	contacted with minimal notice, if at all.
	When the audit is to be...		Then the occupier of the RE is...					
	announced		contacted to schedule the audit.					
unannounced	contacted with minimal notice, if at all.							
2.	An assessment is conducted on documentation associated with the registered operations and functions being audited. The assessment may be conducted as a desk audit prior to the audit commencing or during the audit. Documents may include, but are not limited to: <ul style="list-style-type: none">• pest control, hygiene and waste records• site plans• product flowcharts• supporting documentation.	Auditor						
3.	An entry meeting is conducted by the auditor on-site with the occupier to outline the objectives, scope and process of the audit.	Auditor						
4.	Copies of all required documentation are provided to the auditor. Documents may include, but are not limited to: <ul style="list-style-type: none">• pest control program and records• hygiene program and records• waste program and records• traceability and phytosanitary security systems• transfer records• equipment maintenance and calibration records• training program and records• treatment procedures and records.	Occupier						

Stage	What happens	Responsible party								
5.	A site inspection is completed. Compliance is assessed against the performance standards and any relevant importing country requirements.	Auditor								
	<table><tr><th>When the registered establishment...</th><th>Then...</th></tr><tr><td>meets the performance standard sub-element</td><td><ul style="list-style-type: none">the sub-element is rated as 'compliant' (C)evidence is recorded that supports the rating.</td></tr><tr><td>does not meet the performance standard sub-element</td><td><ul style="list-style-type: none">the sub-element is rated as 'non-compliant' (NC)evidence is recorded that supports the non-compliancea non-compliance rating is assigned by the auditor.</td></tr><tr><td>does not hold the registered operation or function that relates to the performance standard</td><td><ul style="list-style-type: none">the sub-element is rated as 'not applicable' (N/A).</td></tr></table>		When the registered establishment...	Then...	meets the performance standard sub-element	<ul style="list-style-type: none">the sub-element is rated as 'compliant' (C)evidence is recorded that supports the rating.	does not meet the performance standard sub-element	<ul style="list-style-type: none">the sub-element is rated as 'non-compliant' (NC)evidence is recorded that supports the non-compliancea non-compliance rating is assigned by the auditor.	does not hold the registered operation or function that relates to the performance standard	<ul style="list-style-type: none">the sub-element is rated as 'not applicable' (N/A).
	When the registered establishment...		Then...							
	meets the performance standard sub-element		<ul style="list-style-type: none">the sub-element is rated as 'compliant' (C)evidence is recorded that supports the rating.							
	does not meet the performance standard sub-element		<ul style="list-style-type: none">the sub-element is rated as 'non-compliant' (NC)evidence is recorded that supports the non-compliancea non-compliance rating is assigned by the auditor.							
does not hold the registered operation or function that relates to the performance standard	<ul style="list-style-type: none">the sub-element is rated as 'not applicable' (N/A).									

Stage	What happens	Responsible party	
6.	An exit meeting is conducted by the auditor on-site with the occupier to present the audit findings including identified non-compliances and further actions required.	Auditor	
	Note: Where several non-compliances are identified, the auditor can defer the issuance of non-compliances and associated ratings until further consideration has been sought by the AAB delegate.		
	Where non-compliances are...		Then...
	not identified		<ul style="list-style-type: none">the RE is deemed compliantan audit report is issued to the occupier and/or relevant persons within 10 business daysprocess ends here.
	major or minor		<ul style="list-style-type: none">the RE is deemed not complianta non-compliance notice is issued to the RE occupier and/or relevant personsa timeframe for review of the non-compliance notice is givenan assessment is made against the compliance matrix to determine the audit resultan audit report is issued within 10 business days to the occupier and/or relevant personcontinue to Stage 7.
	critical	<ul style="list-style-type: none">the RE is deemed not complianta non-compliance notice is issued to the occupier and/or relevant personan assessment is made against the compliance matrix to determine the audit resultan audit report is issued within 10 business days to the occupier and/or relevant personsthe non-compliance is referred to the AAB delegate by the auditor to determine how to escalate and review the non-compliancerefer to ‘Variations, suspensions and revocation of registration, operations or functions’ in the Exports policy: Management of plant export registered establishmentsprocess ends here.	

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Stage	What happens	Responsible party						
7.	Evidence of compliance is provided to the auditor by the occupier by the review date.	Occupier						
8.	<p>The non-compliance is reviewed by the auditor against the evidence provided by the occupier and/or relevant person.</p> <p>Note: Evidence may be gathered via a follow-up visit to the RE or, where appropriate, assessed and determined remotely (for example, the occupier may email evidence of their non-compliance).</p> <table><tr><th>When the evidence provided is...</th><th>Then...</th></tr><tr><td><ul style="list-style-type: none">• satisfactory and• provided within the required timeframe</td><td><ul style="list-style-type: none">• the RE is deemed compliant• the non-compliance notice is updated with no further action required• process ends here.</td></tr><tr><td><ul style="list-style-type: none">• not satisfactory or• not provided within the required timeframe.</td><td><ul style="list-style-type: none">• remains open with further action required• continue to Stage 9.</td></tr></table>	When the evidence provided is...	Then...	<ul style="list-style-type: none">• satisfactory and• provided within the required timeframe	<ul style="list-style-type: none">• the RE is deemed compliant• the non-compliance notice is updated with no further action required• process ends here.	<ul style="list-style-type: none">• not satisfactory or• not provided within the required timeframe.	<ul style="list-style-type: none">• remains open with further action required• continue to Stage 9.	Auditor
When the evidence provided is...	Then...							
<ul style="list-style-type: none">• satisfactory and• provided within the required timeframe	<ul style="list-style-type: none">• the RE is deemed compliant• the non-compliance notice is updated with no further action required• process ends here.							
<ul style="list-style-type: none">• not satisfactory or• not provided within the required timeframe.	<ul style="list-style-type: none">• remains open with further action required• continue to Stage 9.							
9.	<p>The auditor determines whether to grant an extension to address the non-compliance notice.</p> <table><tr><th>When an extension is...</th><th>Then...</th></tr><tr><td>granted</td><td>return to Stage 7.</td></tr><tr><td>not granted</td><td><ul style="list-style-type: none">• it is referred to the AAB delegate by the auditor to determine how to escalate the issue• refer to 'Variations, suspensions and revocation of registration, operations or functions' in the Exports policy: Management of plant export registered establishments• process ends here.</td></tr></table>	When an extension is...	Then...	granted	return to Stage 7.	not granted	<ul style="list-style-type: none">• it is referred to the AAB delegate by the auditor to determine how to escalate the issue• refer to 'Variations, suspensions and revocation of registration, operations or functions' in the Exports policy: Management of plant export registered establishments• process ends here.	Auditor
When an extension is...	Then...							
granted	return to Stage 7.							
not granted	<ul style="list-style-type: none">• it is referred to the AAB delegate by the auditor to determine how to escalate the issue• refer to 'Variations, suspensions and revocation of registration, operations or functions' in the Exports policy: Management of plant export registered establishments• process ends here.							

Non-compliance ratings

Performance standard elements and sub-elements are assigned one or more potential non-compliance ratings including:

- minor
 - major
- and

- critical.

Where an establishment is deemed non-compliant against a performance standard the auditor must select a non-compliance rating from those listed, considering the context and extent of the non-compliance and the definition of minor, major and critical non-compliances.

Where an auditor believes the non-compliance should be rated a level that is not listed for that performance standard, they may assign an alternate non-compliance rating (for example, where a performance standard states major and critical as the non-compliance rating options and the non-compliance identified fits with the definition of minor, the auditor may list the non-compliance as minor).

Issuing Non-compliance notices

- If a non-compliance is detected during a periodic audit, the auditor must issue a non-compliance notice per performance standard.
- A timeframe for closing out a non-compliance notice must be specified by the auditor and be no longer than
 - 28 calendar days for minor non-compliances
 - 14 calendar days for major non-compliances
 - 7 calendar days for critical non-compliances.
- Prior to the review date, and at the request of the occupier, deadlines for rectification may be extended twice, each for a period equal to the original timeframe.
Important: Requests for extension must be made in writing to AAB to the attention of the auditor who conducted the audit.

When a critical non-compliance is identified

- When an auditor identifies a critical non-compliance, the auditor refers the audit result and non-compliance notice to the AAB delegate, who will determine whether the matter should be referred to Plant Exports Branch to consider future action. Instances where the AAB delegate may refer the matter include where the:
 - RE fails to meet their obligations under legislation, legislative instruments, policies and other requirements
 - RE has been intentionally non-compliant, fraudulent, or corrupt
 - RE has been repeatedly non-compliant in related incidents
 - failure to address non-compliance notices to the satisfaction of the auditor/AAB delegate.
- Future action to address the non-compliance and audit result is at the discretion of the AAB delegate or Plant Exports Branch, which may include, but is not limited to:
 - downgrading the non-compliance notice
 - imposing a timeframe for a follow-up audit or increased audit schedule
 - mandating department supervision for a defined period, particularly for treatment functions
 - variation or suspension of functions or operations or revocation of registration.

Issuing directions for immediate rectification during an audit

A departmental auditor may direct the occupier of a RE to cease export operations immediately and rectify non-compliance using the directional powers contained in the Act, subsection 305(1).

The direction may be given orally or in writing, and the occupier may be subject to a civil penalty if they fail to comply with the direction.

Further guidance on the use of directional powers is contained in the Exports policy: [Management of plant export registered establishments](#).

Audit result

An audit result must be determined at the end of each audit.

The following table shows how an audit result is determined from the number and type of non-compliances identified.

		Major non-compliance				Critical non-compliance
		0	1	2	3 or more	1 or more
Minor non-compliance	0	Pass	Pass	Acceptable	Fail	Fail
	1	Pass	Pass	Marginal	Fail	Fail
	2	Pass	Acceptable	Marginal	Fail	Fail
	3	Pass	Marginal	Fail	Fail	Fail
	4	Acceptable	Marginal	Fail	Fail	Fail
	5–6	Marginal	Fail	Fail	Fail	Fail
	7 or more	Fail	Fail	Fail	Fail	Fail

Note: Any combination of non-compliance notices that exceed those in the table will default in a referral to AAB delegate to determine the next course of action.

The audit result will determine the timeframe for the next periodic audit. REs that are issued non-compliance notices may have the timeframe for their next periodic audit reduced from 12 months to 6 or 3 months. A reduced timeframe allows the department to more closely monitor the RE's performance, and to provide additional support to the RE.

The following table shows the possible audit results and the required timeframe for the next audit.

Audit Result	Action
Pass	Next periodic audit within 12 months
Acceptable	Next periodic audit within 6 months
Marginal	Next periodic audit within 3 months
Fail	Refer to the AAB delegate for immediate action

Suspension or revocation of registration or operations, by the department

Non-compliance may constitute grounds for the suspension or revocation of a RE and/or operation or function without liability to the department, as outlined in the Exports policy: [Management of plant export registered establishments](#).

Non-compliance detected outside of an audit

Non-compliance may be detected outside of an audit by the following:

- non-compliance detected during an Authorised Officer (AO) inspection
- non-compliance detected by an importing country
- documentation issues detected by the department
- documentation issues detected by an AO
- when required, failed test results (for example, dimethoate dipping)
- reported non-compliance by a third-party or visiting department officer.

All non-compliances detected outside of an audit must be referred to the AAB delegate. The next course of action must be determined in consultation with Plant Exports Branch, and will be reviewed on a case-by-case basis.

Note: Reports of deliberate non-compliance can be confidentially made to the department's Redline on 1800 803 006.

Fees and charges

All activities associated with audits are subject to a fee-for-service rate. These activities include preparation and post audit activities and activities in response to non-compliance notices. Where an announced audit is cancelled, charges may still apply.

For treatment functions, some importing countries will conduct an audit of the establishment prior to approval. Those establishments being audited by the importing country authority are responsible for all costs associated with bringing the auditor to Australia.

Note: Information about the fee-for-service rate for audits is available in the department's [Charging Guidelines](#).

Record keeping

RE occupiers and the department must retain documentation in relation to audits for a period of at least 2 years.

Related material

The following related material can be accessed via the [Plant Export Operations Manual](#) on the department's website:

- Exports policy: *Management of plant export registered establishments*
- Exports process instruction: *Administering applications for plant export registered establishments*
- Exports policy: *Audit of plant export operations*
- Exports process instruction: *Export compliant goods storage*
- Exports process instruction: *Mobile bulk loading of prescribed goods for export.*
- Exports process instruction: *Quality system recognition of highly processed plant products for export.*
- Exports reference: *Performance standards for plant export registered establishments*
- Exports reference: *Performance standards – onshore cold treatment – horticulture exports*
- Exports reference: *Performance standards – vapour heat treatment – horticulture exports*
- Exports reference: *Performance standards – irradiation treatment – horticulture exports*
- Exports reference: *Performance standards – dimethoate dipping – horticulture exports*
- Exports reference: *Performance standards – methyl bromide fumigation – horticulture exports*
- Exports reference: *Performance standards – sulfur dioxide carbon dioxide fumigation – horticulture exports*

- Exports reference: *Performance standards – Mobile bulk loading*
- Exports reference: *Performance standards – Quality systems recognition*
- Exports reference: *Performance standards – Export compliant goods storage*
- Exports reference: *Performance standards – Washing potatoes for export to the Republic of Korea*
- Exports reference: *Performance standards – handling fruit fly PFA product outside of a PFA*
- Exports reference: *Performance standards – Packing product post-treatment or Pest Free Area (PFA) product outside of the PFA*
- Exports reference: *Performance standards – Establishment start up audits for log exports to China*
- Exports reference: *Performance standards – Establishment continuation audits for log exports to China*
- Exports reference: *Registered operation and function codes for plant export registered establishments*
- Exports reference: Export Compliant Goods Storage.

The following related material is available on the [Instructional Material Library](#) for departmental auditors:

- Exports process instruction: *Regulatory responses to plant export registered establishments*
- Exports reference: *Audit checklist for plant export registered establishments*
- Exports reference: *Audit checklist – onshore cold treatment – horticulture exports*
- Exports reference: *Audit checklist – dimethoate dipping treatment – horticulture exports*
- Exports reference: *Audit checklist – irradiation treatment – horticulture exports*
- Exports reference: *Audit checklist – vapour heat treatment – horticulture exports*
- Exports reference: *Audit checklist – sulfur dioxide carbon dioxide fumigation – horticulture exports*
- Exports reference: *Audit checklist – methyl bromide fumigation*
- Exports reference: *Audit checklist – handling fruit fly PFA product outside of a PFA*
- Exports reference: *Audit checklist – Export Compliant Goods Storage Audit Checklist*
- Exports reference: *Audit checklist – Quality Systems Recognition*
- Exports reference: *Work health and safety in the plant export environment*

The following related material can be found elsewhere:

- [Charging guidelines](#)
- [Administrative Review Tribunal](#)

Contact information

- Audit and Assurance Branch: AuditServices@aff.gov.au
- Business Systems Program: PlantExportsFinanceandAssurance@aff.gov.au
- Grain Exports Program: Grain.Export@aff.gov.au
- Horticulture Exports Program: HorticultureExports@aff.gov.au
- Redline: 1800 803 006

Document information

The following table contains administrative metadata.

Instructional Material Library document ID	IMLS-9-5660
Instructional material owner	Director, Business Systems Program
Risk rating	Medium
Review period	Due for review within 3 years of the most recent approved date.

Version history

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

Version	Date published	Date last approved	Review type	Summary of review
1.0	16/12/2020	16/12/2020	New document	First publication of this guideline.
2.0	29/06/2020	29/06/2020	Major changes	Changes to the partial scope audit policy and the compliance matrix.
3.0	28/03/2021	28/03/2021	Major changes	Changes to align with the <i>Export Control Act 2020</i> and subordinate legislation.
4.0	1/10/2022	1/10/2022	Major changes	Added information about Global Food Safety Initiative (GFSI) scheme and updated department branding
5.0	24/11/2023	24/11/2023	Major changes	Clarified the language used in policy points for REs to avoid mis intended interpretation.
6	22/04/2025	22/04/2025	Major changes	<ul style="list-style-type: none">Changes in the overall structure to align with exports process instructions template as well that the audit of accredited properties and audit of authorised officers documents.Changes also include, removal NZ requirement sections, addition of logs to China and addition of washing potatoes.

Appendix A: Definitions

The following table defines terms used in this document.

Term	Definition
Advisory findings	A notification, issued by an auditor at an initial audit, advising the establishment that they have not complied with the relevant performance standards and therefore cannot be approved until the findings have been addressed.
Announced audit	An audit that is arranged in advance with the auditee.
Auditor	A departmental officer whose functions and powers include conducting an audit under Part 1 of Chapter 9 of the <i>Export Control Act 2020</i> .
Compliant	Meeting a requirement.
Critical non-compliance rating	<p>When there is:</p> <ul style="list-style-type: none"> • action, inaction or contravention of department requirements that <ul style="list-style-type: none"> ○ would be reasonably expected to result in the phytosanitary status of goods being compromised, or ○ results in a breach of the <i>Export Control Act 2020</i> or the Export Control (Plants and Plant Products) Rules 2021. • a deliberate failure to comply with legislative requirements • a deliberate failure to follow a legal direction of an departmental officer. <p>Note: Critical non-compliances may lead to suspension, revocation, refusal of registration, or criminal prosecution.</p>
Delegate or sub-delegate	A person who has been delegated or sub-delegated a power or function of the Secretary (typically a power or function under the <i>Export Control Act 2020</i>). The delegation must be in writing and be signed by the Secretary (or the Secretary's delegate).
Elements	Performance standards are organised into a set of 'elements' and sub-elements. The element represents the performance standard.
Full scope audit	The audit scope includes an establishment's registered operations and functions.
Further action required	Where a non-compliance notice or advisory finding has been issued and insufficient evidence has been provided to demonstrate effective corrective action has been taken to close the non-compliance notice.
Initial audit	An audit of a premises, after an application or variation is received, to ensure the premises meets all structural, documentary and other regulatory requirements of the performance standards. Under the <i>Export Control Act 2020</i> and for the purpose of associated Fees Rules these are activities carried out in dealing with applications under s379 of the Act.

Term	Definition
Major non-compliance rating	When there is action, inaction or contravention of departmental requirements that <ul style="list-style-type: none"> • results in a situation that may lead to the phytosanitary status of prescribed goods to be compromised • may lead to the export of prescribed goods that are not export compliant.
Minor non-compliance rating	When there is action, inaction or contravention of departmental requirements that results in a situation that may compromise the integrity of systems, processes or premises that are designed to maintain phytosanitary status of prescribed goods.
No further action required	Where a non-compliance notice or advisory finding has been issued and sufficient evidence has been provided to demonstrate effective corrective action has been taken.
Non-compliance notice	A formal notice from the department requesting the cause of non-compliance with requirements to be eliminated, with the objective of preventing reoccurrence.
Non-compliance rating	Ratings of minor, major and critical applied to a non-compliance to indicate the degree of seriousness.
Non-compliant	Not meeting a requirement.
Not applicable	Not assessed for compliance as it is not relevant to the establishment or is not within the scope of the audit.
Occupier (of a registered establishment)	<p>1. The occupier of a RE is the person in whose name the establishment is registered.</p> <p>Note: This includes an agent of the occupier, or person listed in management and control in the RE.</p> <p>2. An occupier of an establishment (other than a RE) where export operations in relation to goods are, were or will be carried out, is:</p> <ul style="list-style-type: none"> a) the person that operates, operated or will operate the business of carrying out export operations in relation to goods at the establishment or b) a person that manages or controls, managed or controlled or will manage or control export operations carried out in relation to goods at the establishment.
Partial scope audit	The audit scope includes one or more, but not all, of the establishment's registered functions and/or selected performance standards for their registered operations.
Performance standards	A benchmark derived from legislation and departmental requirements against which actual performance of third parties is measured.
Periodic audit	A scheduled audit (announced or unannounced) of an establishment against the relevant requirements.

Term	Definition
Registered function	Export function(s) carried out within a RE in relation to prescribed goods for export that has specific policy requirements that must be met and unique procedures to follow. For example, horticulture treatments and quality systems recognition are registered functions.
Registered operation	An export operation(s) carried out within a RE in relation to prescribed goods for export with basic policy requirements and procedures, including packing and inspecting different commodities.
Revocation	A written notice used to remove the registration of an establishment.
Scope	Sets out the registered operations and functions, or parts thereof that will be assessed during the audit.
Serious and urgent	A category which is used to immediately impose an administrative sanction or consequence to a RE where the Secretary reasonably believes that the current registration of the establishment may adversely affect trade if there is any delay to the administrative sanction or consequence being taken.
Sub-elements	Elements are further arranged into 'sub-elements'. Some or all sub-elements must be covered during an audit.
Suspension	A written notice used to remove either all or some of the registered operations and functions an establishment is registered for, for a set time period. Note: A suspension may come in the form of a partial or full suspension.
Treatment	Any treatment that is useful or necessary to control or eradicate pests or remove contaminants. Examples of treatment are: <ul style="list-style-type: none"> • dismantling, repairing, cleaning or deodorising • applying a substance • fumigating • controlling the atmosphere or temperature • repacking.
Unannounced audit	An audit that is carried out without providing advance notice to the auditee.
Variation	A written notice used to add or remove a registered function or operation from a registration of an existing RE, or to make a physical alteration to the RE.