Australian Government

Department of Agriculture, Fisheries and Forestry

GUIDELINE

Quality system recognition of processed plant products for export

Direction to staff

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

Direction to authorised officers

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

Direction to industry

This guideline outlines the requirements for quality systems recognition. All parties with roles and responsibilities explicit in this guideline and legislation must comply with those requirements.

_____

Summary of main points

This document outlines the policy and procedures for:

- applying for quality system recognition
- maintaining quality system recognition.

_____

In this document

This document contains the following topics.

Purpose of this document

This document details the policy and processes supporting the department's Quality System Recognition (QSR).

Definitions

The following table defines terms used in this document.

Term	Definition
Australian export regulation framework	The *Export Control Act 2020* and the Export Control (Plant and Plant Product) Rules 2021.
Authorised officer (AO)	A person authorised under section 291 of the *Export Control Act 2020* to be an authorised officer. The authorised officer may exercise powers and functions conferred on them through an instrument of authorisation. **Note:** An authorised officer may be a Commonwealth, State or Territory government officer or third party individual. Examples of third party individuals include, but are not limited to: • employees of registered establishments • employees of an exporter • self-employed individuals/sole traders.
Client	The exporter, exporter's representative or person responsible for plants and plant products for export.
Establishment Register (ER) database	A database maintained and administered by the department with the status and details of all registered establishments.
Export permit	A permit issued by the department under chapter 7 of the *Export Control Act 2020* and required under the Export Control (Plants 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 *Export Control Act 2020* for a kind of export operations in relation to a kind of prescribed plants or plant products.
Inspection authorised officer (Inspection AO)	An AO approved to inspect plants, plant products, empty containers or empty bulk vessels for export, or supervise phytosanitary treatments. **Note:** This role can be performed by departmental and State/Territory and third-party AOs.
Inspection Record	The approved form for an AO to record the findings and result of an inspection of plants and plant products for export.
Plant Export Operations Manual	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.
Processed products	Products that have been processed in a way that mitigates the risk of live pests and contaminants being present in the final product.

Term	Definition
Quality System	An independently audited system that includes sampling and inspection procedures to control the quality of products.
Quality System Recognition (QSR)	The approval of an establishment that has an audited quality system that effectively manages phytosanitary risks of products prepared for export to meet departmental and importing country requirements.
Securely packaged	Sealed packaging that eliminates, or sufficiently reduces the likelihood of infestation or contamination of the product to the satisfaction of the department.

Legislative framework

The following list outlines the legislation that applies to QSR:

- *Export Control Act 2020* and Export Control (Plant and Plant Products) Rule 2021 (Plant Rules)
  - Chapter 4 – Registered Establishments
  - Part 1 of Chapter 8 – Notice of intention to export
  - Part 2 of Chapter 8 – Trade descriptions
  - Part 1 of Chapter 9 – Audits
  - Part 2 of Chapter 9 – Assessment of goods
  - Section 410 Act – Methods for taking, testing and analysing certain samples
  - Part 1 of Chapter 11 Plant Rules – Records
- Export Control (Fees and Payments) Rules 2021
- *Work Health and Safety Act 2011.*

Roles and responsibilities

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

Role	Responsibility
Audit and Assurance Group	- Conducts an initial audit of an establishment. - Undertakes annual periodic audits of EREs o write up audit reports.
Certification Management Group	Maintains ER database that details QSR approval.
Client	- Applying to the department for QSR in accordance with the requirements in Guideline: *Management of plant export registered establishments* and this guideline. - Maintaining the quality system/s including appropriate records in their ERE. - Maintaining valid ERE registration and upholding an ERE audit result of 'Pass'. - Request approval for any changes to the approved processing methods or quality system/s in accordance with the processes described in the Guideline: *Management of plant export registered establishment*.

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.

Quality system recognition of processed plant products for export
Date published: 24/11/2023

Version no.: 9
4 of 15

Role	Responsibility
Grain and Seed Exports Program	• Undertake technical assessment of the clients QSR application within the department. • Liaise and request further information from the client if necessary, in relation to assessing applications. • Provide further information regarding the requirements for QSR. • Coordinating initial and ongoing audits with audit services, as required.
Inspection AO	• Ensuring that they have the appropriate job functions, powers and delegations listed in their instrument of Appointment to undertake the inspection. • Sighting the consignment for export. • Verifying the consignment matches the documentation (Notice of Intention, Request for Permit). • Verifying the packaging is secure and sealed. • Completing the inspection record. • Passing/failing the consignment.
Independent auditor	Undertakes annual audit and reporting of site's third party quality system.

Quality systems recognition for plant exports

The department recognises that the preparation of processed and securely packaged plant products for export may effectively manage phytosanitary risks through a combination of the manufacturing process and the quality systems implemented.

At QSR approved ERE's, goods produced are only required to pass a verification inspection by the AO (after processing and packaging), in order to comply with requirements for export certification.

Inspection by an authorised officer

• Processed plant products 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 processed plant products must be carried out in accordance with the Work Instruction: *Inspecting processed plant products for export produced under quality systems recognition*.

• Inspections must be recorded on an approved inspection record in accordance with the Work Instruction: *Completing plant export inspection and treatment records*.

   Important: The allocated QSR number of the establishment must be entered into the comments field of this document.

Work health and safety

• Clients and occupiers of registered establishments should comply with the WHS policies of their organisation during the packing, treatment and movement of goods.

• Inspection AOs must:

- o read and be familiar with the Reference: *Work health and safety in the plant export environment*
- o not enter work sites unless it is safe, they are wearing appropriate personal protective equipment (PPE) and have considered any work health and safety (WHS) hazards
- o comply with applicable Commonwealth, state and territory WHS legislation
- o comply with their employer's WHS policies and procedures
- o 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
- o continually assess the possible risks while performing their duties.

Personal protective equipment

- Inspection AOs must wear, and use correctly, all required PPE.
- PPE must be in good order and fit for purpose.

Care and maintenance of equipment

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

Note: See Reference: *Plant exports guide – equipment* for more information on the types of PPE needed for inspection of quality systems.

WHS reporting requirements

- All WHS incidents, near misses and any hazards must be reported to the department, occupier of the registered establishment and the client.
- Departmental AOs must record all WHS incidents, near misses, and any hazards in Aurion.
- State/Territory and third-party AOs must report any hazards, near misses or incidents to Plant Export Training.

Essential inspection equipment

- Inspection AOs must have the minimum equipment as outlined in the relevant work instruction.
- Inspection equipment must be in good order and fit for purpose.
- Departmental AOs must always carry their departmental identity cards.

Note: See Reference: *Plant exports guide – equipment* for more information on the types of equipment needed for the inspection of quality systems.

Prerequisites for quality system recognition

Registration

- The establishment must be registered with the department as a ERE.
- New EREs must demonstrate a high level of compliance over 2 years, with 3 successful audits before they are eligible for QSR.

Note: Detailed information regarding registration and registered establishment requirements is outlined in the 'Establishments' tab of the Plant Export Operation Manual.

Product processing and packaging

- Products must be processed to a point where phytosanitary risks have been mitigated.

- Following processing, goods must be securely packaged.

Important: Packaging must eliminate, or sufficiently reduce the risk of infestation or contamination.

Quality system

- Each ERE must have an independently audited quality system/s that includes sampling and inspection procedures that meet or exceed departmental and importing country phytosanitary requirements.

   Note: Sampling and inspection procedures can be found on the Plant Export Operation Manual under the relevant product inspection. Importing country requirements can be obtained from the importing country authority.

- The quality system must be able to demonstrate a nil tolerance for live pests and contaminants.

- The quality system must be audited by a professional, certified third party auditor, external to the client (independent auditor).

   o Independent audits must be fully documented and made available to the department during the assessment and audit process and upon request.

Equipment use and maintenance

- Any equipment used in the processing of the product must be cleaned and maintained to prevent infestation and contamination.

- All maintenance must be documented with records maintained for 2 years.

   Note: A visual inspection of equipment and maintenance records may be required for audit purposes.

Documented systems

All systems must be documented and version controlled.

Applying for quality system recognition

Application requirements

The client must provide the following information with their application. Information must be on a company letterhead, dated for version control, and signed by a person listed in management and control on the export registration premises.

The client must also comply with application requirements and processes described in the Guideline: *Management of plant export registered establishments*.

Layout of the establishment

- A plan of the establishment showing location of processing and packaging, equipment, storage areas (pre- and post-processing), receival and load-out areas.

- Product flowpaths must be clearly indicated.

- Common conveying equipment and cross-over of product lines must be identified.

Details of the products

- A list of the products proposed for QSR.

- Details of the processing for each product that will mitigate the risk of live pests or contaminants that may have existed in the raw material.

- Details of how the processing limits future contamination and phytosanitary risks in each product.

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.

Quality system recognition of processed plant products for export   Version no.: 9
Date published: 24/11/2023   7 of 15

Packaging and storage

- Description of the packaging material used, how it is sealed, including details on the type, weight and how it is secure from infestation of pests and contamination.
- Photographs of the packaging material used.
- Details of the storage facilities and how these areas are secured from ingress of rodents and other pests.
- If the product is consumer ready/shelf stable, the packaging must include the best before or shelf-life date.

Quality systems

- A list of the current quality systems in place, including the last assessment date, and certificate/s of currency.
- The independent audit schedule of each system.
- Description of how the quality systems meet or exceed the phytosanitary requirements for export in the establishment.
- The independent audit reports from the last 2 years for each quality system.
- Full outline of the traceability measures for the entire product processing flowpath.

Organisational chart

An organisational chart showing key positions/areas of responsibility and occupants involved in the establishment, including staff that have been nominated as substitutes for these key positions.

Quality standards that are audited

A list of the standards included in each quality system that apply to the products, with an explanation of how the standards meet phytosanitary requirements. For example, standards should include, but are not limited to:

- food quality and safety
- equipment hygiene, maintenance and inspection
- sampling procedure and product inspection
- flowpath hygiene and inspection
- storage hygiene, pest control and inspection
- sampling procedure
- sampling rate of at least 2.25 litres per 33.33 tonnes as approved under section 410 of the *Export Control Act 2020*.

Initial QSR audit

- A combined ERE and QSR audit (initial audit) of the establishment must be conducted by the department's Audit and Assurance Branch.
- The quality system must be audited against the requirements outlined in this guideline.
- The audit must take place within 6 months of the issue date of the approval (letter). If the audit would normally fall outside of this timeframe the audit must be rescheduled.
- The ERE must pass the audit before the registered function code will be recorded against the establishment (and appear on the registration certificate).

Application process

The process for applying for quality system recognition is described in the Guideline: *Management of plant export registered establishments*.

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.

Quality system recognition of processed plant products for export   Version no.: 9
Date published: 24/11/2023   8 of 15

Changes to quality system or operations

Changes to the quality system or operations of the establishment that may impact on the phytosanitary status of the commodity.

Maintaining quality system recognition

The department's Grain and Seed Exports Program (GSEP) must be notified immediately of any changes to the quality system or operations of the establishment as these may impact on the phytosanitary status of the commodity.

Documented inventory system

- Records and traceability for all receivables, treatments, load out and operational processes through the facility must be maintained for a period of 2 years.
- A defined identity preservation system must be in place for all products.

Routine sanitation and treatment details

- Records of routine cleaning, sanitation, waste removal and pest control measures must be maintained for a period of 2 years.
- If the product has been treated, records of treatment certificates must be maintained. The treatment certificates must meet the requirements as per the Work Instruction: *Validating supporting documents for the plant exports*.

Sampling system

- The standards or systems implemented by the establishment must include a clear sampling and inspection process.
- The sampling collection system must
  o deliver a representative sample at the rate of at least 2.25 litres per 33.33 tonnes of product
  o be independently audited
  o if automated, have calibration records.

Trade description

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

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

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

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

Packaging and storage

The product must be securely packaged and stored in such a manner to ensure the phytosanitary status of the commodity is maintained.

Note: Packaging approved under QSR is determined by an evaluation of the systems in place, security of the packaging, and the remaining re-infestation risks after packaging, as assessed by the department.

The following table outlines the approved export validity period based on the size and type of packaging used.

Package type	Package size	Period of time	Example products
Hermetically or vacuum sealed, poly/plastic or aluminium flushed foil packets/bags	Sub 1 kg (retail)–15 kg	12 months	Macadamia kernels
Bagged—sealed woven poly, plastic or paper bags (multiwall/reinforced)	10–100 kg	90 days	Flour, gluten, starch, bread mix
Bagged—sealed woven poly (single layer)	10–100 kg	60 days	Flour, stockfeed
Bulk bags (multiple layers)	up to 1000 kg	60 days	Macadamia kernels
Container liner (bulk goods)	18–23 mT	Up to 60 days based on GSEP evaluation of liner security	Bulk processed grains, stockfeed – dried distillers grain etc.

Flowpath inspection

The annual independent audit must involve an inspection of the product flowpath consistent with the requirements in the relevant work instruction.

Note: This requirement means an AO will not need to conduct a separate flowpath inspection. An AO must be satisfied the flowpath meets requirements on the basis of the establishment's QSR approval and annual independent audit.

Periodic audit of plant export registered establishment

- Periodic ERE audits, with a QSR audit component must be conducted by the department to monitor compliance.
- Audits are carried out in line with the Guideline: *Audit of plant export registered establishments*.
- The audit of registered establishments is subject to fee-for-service as per the departmental charging guidelines.
- A QSR approval must be incorporated as part of the documentation for the establishment approval and must be audited at the same time and frequency as the export registration periodic audit.
- The client must provide a copy of independent quality system audit results to the department.
- The establishment must maintain an ERE audit result of 'Pass' with no issued critical or major hygiene and/or traceability corrective actions in order to maintain QSR status. Failure to comply will trigger a review of QSR approval and suspension.

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.

Quality system recognition of processed plant products for export
Date published: 24/11/2023

Version no.: 9
10 of 15

The following table outlines the process for a periodic audit of an establishment with QSR.

Stage	What happens	Responsible party
1.	An entry meeting is held to discuss scope of periodic audit and QSR requirements.	Audit and Assurance Group
2.	• Documentation and records are given to the departmental auditor in relation to hygiene, pest control, waste management, maintenance systems and product/consignment traceability. • Evidence of compliance with quality system, such as independent audit results, certificates and audit schedule, is also provided. **Note:** The client may also provide any proposed changes to the quality system or operations of the establishment that may impact on the phytosanitary status of the product at that time.	Client
3.	The periodic audit is conducted: • documentation, records and other evidence of compliance are reviewed • the quality system is viewed in operation.	Audit and Assurance Group
4.	An exit meeting is conducted where the audit findings are presented, non-compliances are identified and any further actions are explained. | When non-compliances are…	Then… | |---|---| | identified | **continue to Stage 5**. | | not identified | • the property passes the audit • an audit report is completed and provided to the Grain and Seed Exports Program • **process ends here**. | **Note**: Where a number of non-compliances are found at audit the auditor can defer the presentation of the findings.	Audit and Assurance Group

Stage	What happens	Responsible party
5.	A determination is made as to the seriousness of the non-compliance. | When the non-compliance is…	Then… | |---|---| | not serious and urgent: • Minor (any issue including hygiene and/or traceability) • Major (any issue except hygiene and/or traceability) | • a corrective action request is issued • an audit report is completed and provided to the Grain and Seed Exports Program • **continue to Stage 6.** | | serious and urgent: • Major (hygiene and/or traceability issues) • Critical (all) | **go to Stage 8.** |	Audit and Assurance Group
6.	A written submission outlining how the corrective action request has been addressed is provided to AAG/GSEP within 14 days of the notice.	Client
7.	The written submission is reviewed and a determination is made whether to close out the corrective action request. | When the corrective action request is…	Then… | |---|---| | closed out | • the property passes the audit • **process ends here**. | | not closed out | **continue to Stage 8.** | **Note:** Evidence may be gathered via a follow-up visit to the property or where appropriate, determined remotely (for example, the manager may email evidence of their corrective action).	Audit and Assurance Group
8.	**Refer to** Section 'Variations, suspension and revocation of registration, operations or functions' of the Guideline: *Management of plant export registered establishments* for the process to follow.	Audit and Assurance Group

Non-compliance ratings

The following table outlines the non-compliance ratings given at periodic audits.

Type	Description

Critical	When there is:
	
	• action, inaction or contravention of department requirements that
	    o would be reasonably expected to result in the phytosanitary status of goods being compromised, or
	    o results in a breach of the *Export Control Act 2020*.
	• a deliberate failure to comply with legislative requirements
	• a deliberate failure to follow a legal direction of an AO.
	
	Note: Critical non-compliances may lead to suspension, revocation, refusal of registration, or criminal prosecution.

Major	When there is action, inaction or contravention of departmental requirements that • results in a situation that may lead to the phytosanitary status of prescribed goods to be compromised • may lead to export of prescribed goods that are not export compliant.
Minor	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.

Corrective action requests

• A departmental auditor may issue corrective action requests (CARs) directly during an audit, or recommend to the Secretary, or a delegate thereof, to
  o suspend the QSR approval or vary the registration to remove the QSR approval
  o suspend a particular export operation for which approval was granted
  o determine the period of suspension based on period of time necessary for site to correct issued non-compliances.

Note: When a QSR approval is suspended, the registered establishment may be able to continue to export under other registered export operations but will require the full AO sampling and inspection procedure to be followed.

Variation, suspension or revocation of QSR approval

For further information on the process to vary, suspend or revoke a registered establishment and any QSR approval, see Guideline: *Management of plant export registered establishments*. For information relating to internal review and appeals policies are contained in that guideline.

A QSR approval may be reinstated following:

• a period of suspension and where the suspension has been revoked
• where the client has subsequently applied for and been granted QSR approval again.

If QSR approval is reinstated, the establishment will be audited within three months or during the following quarter.

Note: Failure to pass the follow-up audit may result in the revocation of registration by the delegate.

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.

Quality system recognition of processed plant products for export   Version no.: 9
Date published: 24/11/2023   13 of 15

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, occupiers of registered establishments and AOs must retain documentation 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
    - o Guideline: *Management of plant export registered establishments*
    - o Guideline: *Audit of plant export registered establishments*
    - o Guideline: *Supporting documents for plant exports*
    - o Work Instruction: *Inspecting processed plant products for export produced under quality systems recognition*
    - o Work Instruction: *Completing plant export inspection and treatment records*
    - o Reference: *Plant exports guide – equipment*
    - o Reference: *Table of authorised officer job functions*
    - o Reference: *Work health and safety in the plant export environment*

Contact information

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

Document information

The following table contains administrative metadata.

Instructional Material Library document ID	Instructional material owner
IMLS-9-4192	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	06/07/2015	First publication of this guideline.
2.0	04/11/2016	Changes to policy.

Version	Date	Amendment details
3.0	12/10/2018	New QSR application and packaging requirements.
4.0	2/03/2020	Addition of policy for trade description.
5.0	24/04/2020	Amendment to the audit result required to maintain ERE registration.
6.0	3/06/2020	Document re-published from IML Archive with no changes.
7.0	3/06/2020	• Amendment to the non-compliance ratings. • Update to the Audit and Assurance Group name.
8.0	28/03/2021	Updates to reflect the commencement of the *Export Control Act 2020* and associated Plant Rules, and new streamlined RE application processes.
9	24/11/2023	Updated department branding, email addresses and the references related to registered establishments to ensure clarity of the content and to prevent mis intended interpretation.