



REFERENCE

Export Compliant Goods Storage

In this document

This document contains the following topics.

Purpose	3
Scope.....	3
Definitions.....	3
Prerequisite requirements.....	7
Transportation and storage	7
Accepted methods of transport.....	7
Transfer certificate.....	7
Equipment use and maintenance	8
Frequency of maintenance	8
Sanitation and pest control.....	8
Overall cleanliness and hygiene of facility	8
Work health and safety.....	8
Contingency arrangements.....	8
Non-Compliant Goods (NCG)/Rejected Goods	8
Re-inspection of ECG.....	9
Procedure for rejection of prescribed goods.....	9
Documented inventory system.....	9
Receivals.....	9
Routine sanitation and Treatments details.....	9
Outturn	9
Operational processes	9
Sampling system	10
Hazard Identification Mitigation Survey (HIMS)	10
Identification of hazards	10
Steps.....	10
Eliminating hazard.....	10
Record keeping	10
Prohibited activities	11

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Requirements for Application.....	11
Layout of the establishment	11
Site Map and flow path sequence	12
Aerial Map.....	12
Drawing flow paths	12
Accuracy	12
Approval of ECGS	13
Audits	13
Audit Types	14
Non compliances.....	14
Related material.....	14
Contact Information.....	14
Document information	3
Version history	15

Purpose

To provide detailed guidelines for the operation of a registered establishment approved for Export Compliant Goods Storage (ECGS).

Scope

The Department of Agriculture, Fisheries and Forestry outlines the requirements for the approval and implementation of an ECGS designed for the storage of goods that have passed phytosanitary inspection (Export Compliant Goods (ECG)) prior to export.

The procedures in this document apply to the storage and movement of ECG within and between ECGS registered establishments. This document should be read in conjunction with the Guideline: [Export Compliant Goods Storage](#) (ECGS), applicable commodity inspection Guidelines and Work Instructions on the Plant Exports Operation Manual ([PEOM](#)) and site-specific work plans and audit instructions.

Procedures in this document are intended for use by Authorised Officers (AOs) and persons involved in the operation and management of a registered export establishment approved for ECGS.

Definitions

The following table defines terms used in this document.

Term	Definition
Application form	A specific form used for making an application for the approval of ECGS.
Audit	<p>Surveillance Audit: An audit carried out at the site where inspection activities are undertaken, which examines the specific components of the ECGS to ensure that the prescribed goods meet import conditions and the department requirements.</p> <p>Desktop Audit: Desktop audit is the review of quality documents of an organisation to ensure compliance with the department's ECGS requirements and to allow the auditor to familiarise themselves with the auditee's quality system. This is done prior to a regular physical audit.</p> <p>Systems Audit: An audit carried out on all components of the establishment including ECGS that relates to its ability to meet the requirements of agreed departmental standards.</p>

Term	Definition
Authorised officer (AO)	<p>A person authorised under section 291 of the <i>Export Control Act 2020</i> to be an authorised officer. The AO may exercise powers and functions conferred on them through an instrument of authorisation.</p> <p>Note: 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"> • employees of registered establishments • employees of an exporter • self-employed individuals/sole traders.
Consignment	A quantity of plants, plant product and/or articles being moved from one country to another and covered, when required, by a Phytosanitary certificate(s). A consignment may be composed of one or more commodities or lots (ISPM 5).
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 (including insects), weed seeds, leaves, stems, odour, pickling compounds, artificial colouring and other extraneous material.
Control Point	A step in a system where specific procedures can be applied to achieve a defined effect and can be measured, monitored, controlled and corrected (ISPM 14).
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
ECGS Registered Establishment	A registered export establishment that has been approved by the department to operate an ECGS.
Export Compliant Goods (ECG)	<p>Goods that have been presented to an AO and passed assessment are considered to be 'passed as export compliant' and have attained a Phytosanitary Status</p> <p>These goods are considered compliant with requirements for export set out in the Plant Rules as required under the <i>Export Control Act 2020</i>.</p>
Infestation	<p>Presence in a commodity of a living pest of the plant or plant product concerned. Infestation includes infection (ISPM 5).</p> <p>See also 'pest'.</p>
Inspection	The act of inspecting goods or transport units/conveyances to ensure that legislative, phytosanitary, or other certification and importing country requirements are met.

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Term	Definition
Non-Compliant Goods (NCG)	Goods are considered non-compliant if live pests and contaminants above tolerance have been found during inspection or the goods do not meet the Export Control Act 2020 and subordinate legislation or importing country requirements.
Non-conformity (major)	A deviation (or multiple deviations) from the documented compliance agreement that compromises the integrity of the arrangement in such a way that immediate corrective action/regulatory investigation is required by the department. Major non-conformities generally involve a breach of the legislation.
Non-conformity (minor)	A deviation (or multiple deviations) from the documented agreement that may compromise the integrity of the arrangement if left unchecked for some time. Minor non-conformances generally involve minor changes in the procedure, mostly by mistakes such as signs missing or illegible, absence of lights.
Non-injurious pests	Suspected field species that are not considered as stored product pests and generally picked up during harvest. Irrespective of whether a pest will survive, there is a level of infestation that could be detrimental for Australia's international export reputation.
Pathway	Any means that allows the entry or spread of pests (ISPM 5).
Pest	Any species, strain, or biotype of plant, animal or pathogenic agent, that is injurious to plants or plant products. Examples of pests are live animals and live insects.
Plant products	A product derived or sourced from a plant or part of a plant, whether processed or unprocessed, including the fruit or seeds.
Prescribed goods	Goods that are listed in the Export Control Rules to be prescribed goods for the purposes of the <i>Export Control Act 2020</i> . This includes: <ul style="list-style-type: none"> 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.
Registered Establishment	An establishment that is registered under chapter 4 of the <i>Export Control Act 2020</i> for a kind of export operations in relation to a kind of prescribed plants or plant products.

Term	Definition
Risk	The likelihood of hazard causing injury or disease or mixing of export compliant and non-export compliant goods or maintaining the integrity of export compliant goods. It is measured in terms of consequences and likelihood. A common definition of risk is the combination of a specific hazard and the likelihood that the hazard occurs (probability x hazard). That likelihood may be expressed as a rate or a probability.
Risk assessment	<p>The process of analysing the potential losses from a given hazard using a combination of known information about the situation, knowledge about the underlying processes, and judgment about the information that is not known or well understood. The basic goals of risk assessment include:</p> <ul style="list-style-type: none"> • identify potentially hazardous situations • apply appropriate methods to estimate the likelihood that a hazard occurs, and the uncertainty in that estimate • provide alternative solutions to reduce the risk • estimate the effectiveness of proposed solutions • provide information to base a risk management decision • estimate the uncertainty associated with the analysis.
Risk management	The process of combining a risk assessment with decisions on how to address that risk. Risk management is part of a larger decision process that considers the technical and social aspects of the risk situation.
Risk estimate	A measure of risk in terms of a combination of consequence and likelihood assessments. Risk estimation can be done in several ways including historical data, mathematical modelling, breaking down the system into known subsystems, analogy with similar situations, comparison with similar activities and a combination of various methods.
Sample	A quantity of relevant goods that is representative of the entire consignment. The method of collecting a representation of a commodity is based on a sampling plan in order to ascertain pest levels or for other testing such as viability.
Standards/Specifications	The document or part thereof, that prescribes the requirements with which the plant product or export establishment with approved ECGS has to comply.

Term	Definition
Treatment	<p>Means any treatment that is useful or necessary to control or eradicate pests or remove contaminants.</p> <p>The following are examples of treatment:</p> <ul style="list-style-type: none"> • dismantling, repairing, cleaning or deodorising • applying a substance • fumigating • controlling the atmosphere or temperature • repacking.
Verification	The confirmation by examination and provision of objective evidence that specified requirements have been fulfilled.

Prerequisite requirements

The prerequisite for export registered establishments intending to apply for approval of ECGS are outlined in this section.

Transportation and storage

Goods at the ECGS establishment must be transported, stored, and handled in a manner which ensures that goods do not become contaminated or infested once they have been passed by an AO. Transportation and storage records at the ECGS establishment must be documented with an ability to trace back the inspected goods from the ECGS through to the source.

ECGS receptacles must prevent the entry of pests, vermin, rodents, moisture and other contaminants, ensuring the integrity of ECG is maintained. An ECGS is to be constructed with suitable material to minimise cross-contamination and re-infestation of ECG. Any storage conditions that may potentially compromise the integrity of ECG must be addressed and rectified as soon as detected. AOs must ensure that the ECGS has been cleaned thoroughly and that there is no residue that may harbour pests and contaminants prior to loading ECG.

Accepted methods of transport

ECG can be transported from one ECGS to another ECGS or to the point of export provided the phytosanitary integrity of the goods is maintained by inspecting transport units including trucks, rail wagons, and containers. The AOs must conduct the flow path inspection and ensure the mode of transport is export compliant and will not alter the integrity of the goods passed as export compliant. The transport unit must be inspected and passed as export compliant before loading ECG into it.

Transfer certificate

Where ECG are transferred between various ECGS establishments, the AO shall issue a transfer certificate for each consignment. The integrity of the ECG and the transport must be maintained during this process. The AO must ensure the pathways and transport units are suitable for transporting ECG with minimal risk of cross-contamination or re-infestation during the transfer process.

Equipment use and maintenance

Any equipment used in the ECGS process must be maintained in a manner to prevent contamination/re-infestation of ECG. Equipment must be able to be inspected with maintenance records documented and presented for audit if required.

Frequency of maintenance

The establishment occupier/operator must provide adequate programs for maintenance of the establishment and equipment, calibration of monitoring equipment, and validation of treatment equipment. The flow path and the conveyor or transport used to convey goods from the point of inspection to the ECGS must be cleaned and properly maintained with minimal risk of cross-contamination or re-infestation. Where available it is recommended that Australian Standards or manufacturers' recommendations be considered and followed for the maintenance of various equipment used.

Sanitation and pest control

All elements must be monitored and controlled and the occupier of an ECGS registered establishment is to maintain appropriate records. The hygiene process and management system must be documented.

Overall cleanliness and hygiene of facility

An appropriate standard of hygiene is required to be maintained at export registered establishments at all times to minimise any risk of cross contamination, harbouring of pests, or transferring contaminants to ECG within ECGS.

Importing countries may also require additional hygiene measures from export registered establishments.

The occupier/operator of ECGS registered establishment must maintain the facility including ECGS in a hygienic condition to control pests including vermin and have a defined program of hygiene and pest control. The records of cleaning and pest control activities must be documented in sufficient details to enable the department to monitor the effectiveness of pest control measures as per requirements for export registered establishments.

Work health and safety

Defined Work Health and Safety Policy and documented procedures must be in place for the establishment.

Contingency arrangements

Well-defined and documented procedures and policy for managing non-compliant goods (NCG) must be in place for the registered establishment.

Non-Compliant Goods (NCG)/Rejected Goods

Goods that are inspected and found to be infested with live insects and/or contamination above specified tolerance levels are NCG and must be rejected in accordance with the relevant work instruction. Rejected goods must be treated prior to being re-presented for export inspection as per the relevant work instruction.

NCG/rejected goods must be segregated from ECG, so they pose no risk of cross contamination. Segregation must include a physical barrier between lots, identification marks on lots or a specified separation distance between each lot. The ECGS must be clearly marked and easily distinguished from other storages within the establishment.

Re-inspection of ECG

Re-inspection of ECG is necessary if:

- time between inspection and export exceeds the 28-day validity period
- maximum time between inspection and export permitted by the importing country is exceeded
- there is reason to believe conditions have changed.

When an importing country's requirement is less than 28 days, the importing country's requirement takes precedence over the 28-day validity period.

Procedure for rejection of prescribed goods

Refer to relevant [PEOM](#) and commodity Work Instruction for details.

Documented inventory system

The occupier/operator of an establishment must maintain accurate records and traceability for all receipts, treatments, outturn, and operational processes through the facility. There must be a defined identity preservation system in place for all commodities.

Receipts

The ECGS registered establishments are required to keep and maintain records of goods received for traceability for 2 years. These records must be presented to the department when requested.

Routine sanitation and Treatments details

Records of routine cleaning, sanitation and pest control measures must be documented and maintained for up to 2 years. Details of treatments applied, including, where appropriate, details of fumigation (name, dosage and time) should be recorded in appropriate form.

Outturn

The ECGS registered establishment are required to keep records of the quantities of prescribed goods stored in ECGS and consequently exported to various markets after the inspection was conducted.

Goods inspected, passed and stored within ECGS can be exported within 28 days from the initial inspection into each ECGS.

Prior to outturn:

- flow path from ECGS to point of export or transfer must be inspected and passed as per the relevant work instruction.
- AO must verify that goods intended for export/transfer were inspected and passed, and still are within their 28-day validity period.

Operational processes

The ECGS registered establishments are required to document operational procedures including the cleaning of receptacles prior to being loaded with ECG, the point of inspection to ECGS and to the point from where goods are to be exported. The operational procedures used must maintain the integrity of the inspected goods and address the issues of re-infestation and cross-contamination of ECG.

Sampling system

A sampling system must meet the requirements of Australian legislation with collection system that delivers a representative sample.

Please refer to the [PEOM](#) and the relevant Work Instruction.

Hazard Identification Mitigation Survey (HIMS)

All steps in the ECGS process must be assessed to consider the risk of goods contamination prior to ECGS approval (**Refer to** the Reference: [Export compliant goods storage \(ECGS\) hazard identification and mitigation survey](#)). Hazards need to be identified and preventative measures implemented to minimise or eliminate those risks.

Identification of hazards

The occupier of an ECGS must complete the HIMS and identify and provide control measures for potential hazards that may result in cross contamination, poor ECGS maintenance and upkeep, and the like.

Steps

Each step is a location or procedure which, if controlled, can prevent, minimise or reduce a hazard to an acceptable level. Steps in the preparation of the prescribed goods for export must be controlled to either eliminate or reduce the hazard to an acceptable level.

Following are 3 basic steps used to manage risks:

- identify the hazard
- assess the risk
- mitigate the risk by elimination, substitution, safeguards, and the like.

It is vital that the numbers of steps are limited to those that are critical control points in the flow path. The information established during the hazard identification and analysis should allow the identification of critical steps.

Some of the steps used in identifying the risk for ECGS include sampling collection points, transport from sampling point to storage, storage of goods, transport from storage to point of export.

The occupier/operator of an export registered establishment must have a documented HIMS. Please refer to relevant Work Instructions for details. A system which identifies specific hazard(s) and preventative measures for their control is available in the Reference: [Export compliant goods storage \(ECGS\) hazard identification and mitigation survey](#).

Eliminating hazard

Once a hazard has been identified, a series of steps/control points have to be followed to minimise or remove the risk. Control points identified in the HIMS will undergo assessment by the department in the application process and may require follow up assessment to ensure effectiveness.

Record keeping

The occupier/operator of an approved ECGS shall maintain all records for a minimum period of two years. The records are maintained to provide verification that the ECGS is consistently meeting agreed requirements. All documentation should be made available for review at the time of audit. Documentation that shall be retained for 2 years for ECGS includes but is not limited to:

- ECGS registration
- traceability records, retained to a level that identifies the pathway of all ECG that have been stored in the ECGS

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- traceability of NCG and associated treatments
- audits and hygiene records of ECGS, including flow path inspections.

Prohibited activities

Any activities that could potentially compromise the integrity of the ECGS or ECG must not be carried out in a defined ECGS and inspection areas. Prohibited activities may include but are not limited to:

- mixing of goods passed as export compliant, with goods that were rejected during inspection or with goods that have not been inspected
- transportation of ECG with rejected goods or with goods which have not been inspected
- mixing of ECG for different markets that have less stringent phytosanitary import conditions.

Requirements for Application

The application process is outlined in the Guideline: [Management of plant export registered establishments](#) for further information on these general requirements.

Applications must contain all of the required information and meet the prerequisites (see Section [Transportation and storage](#) for details).

Layout of the establishment

The occupier/operator of an export registered establishment must provide the following information while seeking approval for an ECGS:

- a simple plan of the establishment showing location of major items including equipment, and receival and outloading areas. Product flow paths should be clearly indicated, with particular attention to any common conveying equipment and cross-over of product lines, where there is a potential for cross-contamination or residue build up. Plans can be drawn over the top of an aerial photo provided that they are neat and clear.
- the occupier/operator of the proposed ECGS registered establishment must provide the name and business address of the export registered establishment. If the occupier is a corporation – the name and address of the person, or each person, who is to manage or control the operations to be carried out in the establishment must be provided. If the occupier is a partnership – the name and address of the partners must be provided.
- the location of the premises, including a locality map showing the site in relation to the local area
- the external boundary of the premises
- plans or diagrams giving the general structural and operational layout of the export registered establishment including
 - all major dimensions and scale, including details of inspection facilities and any required amenities
 - a site plan showing all salient features of the site and adjoining sites including the location of the establishment and the proposed ECGS
 - elevations of all buildings of the establishment
 - a general floor plan and a floor plan of processing areas, showing all permanent fixtures and the layout of equipment
- a product flow chart and main features of product flow and details of the type of goods to be handled.

Site Map and flow path sequence

The occupier of the export registered establishment must provide a drawn site map showing the location of the establishment, including a locality map showing the site in relation to the local area and the location of ECGS. A floor plan of processing areas, showing all permanent fixtures, the layout of equipment and flow path should also be provided to the department with the application (refer to Table 2).

The flow path sequence must be overlaid over the site map using symbols described in Table 2. Flow path can be divided into various distinct segments such as location of sample collection point, sampling point to ECGS, diversion of rejected goods away from ECGS, intake of ECG into ECGS, intake of NCG/rejected goods into a hospital bin and transportation from ECGS to the point of export.

Aerial Map

A photographic aerial map drawn up to scale and defined using GPS coordinates (either decimal latitude and longitude or UTM) or equivalent of the entire site is required. The map must include all steps of the process from receipt point to inspection and product flow to the final delivery point and the proposed location of ECGS.

The Global Positioning System (GPS) is a satellite-based system that can be used to locate positions anywhere on the earth. GPS provides continuous (24 hours/day), real-time, 3-dimensional positioning, navigation and timing worldwide. Any person with a GPS receiver can access the system, and it can be used for any application that requires location coordinates. The GPS system consists of three segments including the space segment - the GPS satellites themselves, the control system, and the user segment, which includes users and their GPS equipment. The advantage of GPS of an ECGS is that it can be located by an auditor at any time using GPS equipment.

Drawing flow paths

The method of drawing acceptable flow charts is as follows:

- list all steps including minor steps
- classify and draw the steps as operations, inspection, transportation, or storage using the standard symbols (Table 2)
- each step should be annotated with GPS/UTM coordinates or equivalent for the process location or be identified on the processing/packing operations map.



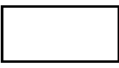















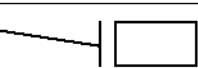

Beside each symbol, name:

- inspections performed, and their frequency (for example, 30 minutes; hourly; daily)
- the titles/reference numbers of log sheets or recording forms used to record inspections
- who is responsible for performing the checks and inspections.

Accuracy

The occupier of an ECGS registered establishment is required to ensure that all the information provided is accurate, professionally compiled, properly documented and is made available for audit when required. This applies to whole policy including export registered establishment.

Table 2: The following table shows the symbols that can be used to describe the site plan when applying for ECGS.

Feature	Symbol	ECGS
Silo storage		
Shed storage		
Bunker storage		
Sample collection point		
Sample delivery and inspection point		
Bi directional conveyor		
Uni directional conveyor		
In load point		
Out load point		
Waypoint		

Approval of ECGS

If satisfied, the department AO will recommend the ECGS for approval to the department. The appropriate delegate of the Secretary will formally offer approval by sending a signed letter of approval to the management of the export establishment where the ECGS is located. Retention of approval depends on ECGS successfully meeting the requirements of the ongoing audits.

Audits

The *Export Control Act 2020* and *Export Control (Plant and Plant Products) Rules 2021* set the requirements for export registered establishments. An export registered establishment needs to

comply with these requirements to ensure products prepared for export comply with Australian legislative and importing country requirements. The client must also comply with application requirements and processes described in the Guideline: [Audit of plant export registered establishments](#).

ECGS registered establishments will be subject to periodic audits as per standard export establishments including documented critical ECGS requirements. Registered establishments with an approved ECGS arrangement must demonstrate compliance with the ECGS operation agreement and ECGS policy.

Audit Types

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

Non compliances

The secretary, or a delegate of the secretary, has authority to suspend, vary or revoke approval of an ECGS as outlined in Guideline: [Management of plant export registered establishments](#).

Related material

- *Export Control Act 2020*
- Export Control (Plants and Plant Products) Rules 2021
- [Plant Exports Operations Manual](#)
 - Guideline: *Management of plant export registered establishments*
 - Guideline: *Audit of plant export registered establishments*
 - Guideline: *Export Compliant Goods Storage*
 - Reference: *Export compliant goods storage (ECGS) hazard identification and mitigation survey*

Contact Information

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Document information

The following table contains administrative metadata.

Instructional Material Library document ID	Instructional material owner
IMLS-9-7671	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	15/03/2013	To allow ECGS registered establishments to have prescribed goods inspected for export compliance at an earlier stage in the supply chain and securely stored in an approved receptacle (storage) for a period of up to 28 days before export.
2	28/03/2021	Amendments for commencement of the <i>Export Control Act 2020</i> and associated Plant Rules.
3	24/11/2023	Updated department branding, email addresses and the references related to registered establishments to ensure clarity of the content and to prevent mis intended interpretation.