Understanding accredited properties for general products exports

Purpose

The Australian Government is developing a new regulatory framework for the export of prescribed general products. Under the proposed framework, some properties involved in preparing general products for export will need to become accredited properties.

This paper explains:

- what an accredited property is
- why the arrangements are changing
- who will need an accredited property
- what an accredited property approval will cover
- how accredited properties differ from other regulatory controls
- why registered establishments are not proposed for general products
- when accredited properties will be required
- what the proposed accreditation categories mean
- how accreditation applications and assessments are expected to work
- how accredited properties are used when exporting
- the responsibilities of exporters and accredited property managers
- how auditing may apply
- non-compliance and regulatory action
- the key risks managed through accreditation.

The proposed arrangements remain subject to government consideration, legislative approval and implementation decisions.

Accredited properties

An accredited property is a property approved by the department to carry out specified export operations for particular goods and, where relevant, for specific export markets. Accreditation provides assurance that activities carried out at the property meet applicable regulatory and importing country requirements. The accreditation will specify the export operations, products and destination markets it covers.

Activities that may be covered under an accredited property arrangement include activities to prepare goods, such as:

- manufacturing or processing goods for export
- packing goods
- storing goods before export

- handling goods during preparation for export.

Accreditation provides the department with assurance that specified export operations are carried out in a way that supports integrity, traceability and compliance of goods intended for export. Accreditation enables the department to have oversight of activities undertaken at the property and provides confidence that appropriate systems, processes and controls are in place to meet applicable regulatory and importing country requirements.

For general products, accredited properties will be required where an importing country seeks Australian Government assurance or oversight of the property at which specified export activities occur, beyond the assurance provided through an export licence or government certificate.

Reasons for the change

Under the existing non-prescribed goods administrative arrangements, some establishments are 'listed' where importing countries require government oversight or approval.

Under the proposed general products framework, **existing establishment listings will be replaced by accredited properties.** This will place the current listing arrangements within a clearer legislative framework under the *Export Control Act 2020* and the proposed *Export Control (General Products) Rules*.

The change is intended to provide government oversight of relevant properties and processes without requiring all premises involved in an export supply chain to be regulated in the same way. Accredited properties are proposed as a targeted regulatory tool linked to particular premises and specified export operations.

In practical terms:

- properties currently operating under an establishment listing will need to transition to the accredited property framework
- new properties will need to apply for accreditation where it is required for their products, export operations and export markets, if applicable.
- exporters that do not operate an accredited property may export products sourced from an appropriately accredited third-party property, where a requirement for accreditation exists.

Why accredited properties are proposed instead of registered establishments

Registered establishments are an established regulatory mechanism under the *Export Control Act 2020*. The legislative requirements applying to registered establishments are more extensive than those proposed for accredited properties.

For general products, property-level oversight is expected to be required only for particular combinations of products, export operations and destination markets. Applying the registered establishment model could create a greater administrative and compliance burden than is needed for these export pathways.

The accredited property model is intended to provide a more targeted and proportionate mechanism. It allows the department to approve a property for the specific export operations, products and markets for which assurance is required, while maintaining appropriate audit, compliance and enforcement powers. This does not reduce the assurance provided to importing countries; it aligns the regulatory control with the scope and level of assurance required for the relevant export pathway.

If a property is already a registered establishment for another export commodity or regulatory purpose, that registration would continue to apply to the export operations and products within its approved scope. The property may also need accredited property approval for general products where the relevant export pathway requires it. The two approvals would operate alongside each other, and existing registration would not automatically remove the need for general products accreditation or require the property to be registered again. Where possible, the department would seek to use existing information and assurance evidence to avoid unnecessary duplication, subject to the applicable legislative and importing country requirements and final transition guidance.

Properties that need accreditation

Not every property handling general products will require accreditation.

Accreditation will be required only where the relevant export pathway requires Australian Government oversight of an operation undertaken at the property. The requirement will depend on the product, destination country, export operation, applicable importing country requirements and the assurance the Australian Government must provide.

For example, an accredited property may be required where an importing country requires certain goods to be manufactured, processed, packed, stored or handled at an approved facility before they are eligible for export.

The department is developing a list of the specific product, export operation and market combinations for which accreditation will be required. This list is expected to be published on the department's website, with relevant information also available through the Manual of Importing Country Requirements (Micor).

Exporters will remain responsible for confirming the requirements applying to their goods and markets. Where accreditation is required, they will also need to confirm that the relevant export operations were undertaken at a property with the appropriate scope of accreditation.

Scope of accreditation

An accredited property approval will specify the:

- property to which the accreditation applies
- export operations covered by the accreditation
- destination market and product combinations covered by the accreditation.

A property may be accredited for activities to prepare particular general products for particular export markets, including manufacturing or processing, packing, storing or handling. The scope of accreditation will depend on the export operations undertaken at the property and the assurance required for the relevant products and markets.

Accredited properties will not be required to be connected to particular exporters or export licences. Where accreditation is required, an exporter will be responsible for ensuring that the relevant operations were undertaken at a property accredited for the applicable products, operations and destination markets.

Comparison with other regulatory controls

Table 1 Comparison of regulatory controls

Regulatory control	What it does	When it applies
Accredited property	Provides assurance for specified export operations conducted at a property, covering particular products and export markets.	Only where property-level government oversight is required to meet importing country requirements.
Export licence	Authorises the responsible person or entity to export prescribed general products and establishes exporter accountability.	Required for all exporters of prescribed general products once the relevant tranche commences.
Government certificate	Provides official assurance for a particular consignment, particular consignments or other certification request.	Where required by the importing country or requested for market access purposes.

An accredited property is separate from an export licence. An export licence authorises a person or an entity to export prescribed general products, while an accredited property provides assurance about specified export operations undertaken at a particular property.

Operating an accredited property does not remove the need for the responsible exporter to hold an export licence. Similarly, holding an export licence does not remove the need to use an accredited property or obtain a government certificate where those additional controls apply.

An exporter may source goods from a manufacturer, processor, packer, warehouse or other facility operated by another business. The exporter does not necessarily need to manage its own accredited property, provided the relevant export operations are undertaken at a property accredited for the applicable products, export operations and markets.

Proposed commencement and transition

Applications for accredited properties are proposed to open through the department's TradeClear online portal from 1 July 2027.

Managers of existing listed establishments will need to apply for accreditation when their annual continuation of listing is due, or no later than four months before accreditation becomes mandatory on 1 July 2028.

These dates and transition arrangements remain subject to final policy, legislative and implementation decisions.

Proposed accreditation categories

A wide range of requirements will be managed through accredited properties. The current proposal groups these requirements into three categories—Simple, Moderate and Complex—based on the comparative regulatory risk and the departmental effort needed to oversee that risk, maintain market access and deliver the associated regulatory services. The categories also inform the proposed application fees and annual charges by aligning charges with the expected level of regulatory activity.

The department will publish the category for each accredited property requirement on its website. The categories reflect differences in regulatory effort and assurance needs. They were assigned based on factors including:

- the importing country's requirements
- the export operations undertaken at the property
- the products and markets covered
- the evidence the department needs to assess
- whether separate approval by an importing authority is required
- the level of ongoing assurance needed.

Simple accreditation

Simple accreditation applies where Australian Government oversight of the property is sufficient to satisfy the importing country requirements, and it is not necessary to obtain separate approval from the importing country authority. The department's assessment would focus on establishing the property's identity, management and proposed scope of accreditation, and confirming that the property has appropriate systems and controls for the relevant export operations.

For a property manager, this may involve providing details of the property, the people responsible for its management and control, the products and destination markets covered, and the export operations undertaken, including manufacturing or processing, packing, storage or handling. Supporting material may include process descriptions, site or business information, records and declarations that requirements will be met. The exact evidence will depend on the relevant product and export operation. Ongoing assurance may include keeping records current, notifying relevant changes and participating in audits or verification activities where required.

Illustrative example: An Australian business manufactures and packs shelf-stable general food products for a destination market that requires the goods to come from a property overseen by the Australian Government. The importing country does not require a detailed market-specific questionnaire or separate approval of the property. The property manager provides details of the property, its manufacturing and packing activities, the products intended for export and evidence of basic controls such as traceability, hygiene and record keeping. The department checks this information, confirms the proposed scope and, if satisfied, accredits the property for that product, export operation and market combination.

Department effort: Departmental effort required to deliver accreditation services is not onerous. It may include checking that applications are complete, confirming the applicant and property details, identifying the proposed scope of export operations, reviewing basic supporting information, determining whether the relevant requirements are met, recording the accreditation in departmental systems and issuing the decision. Ongoing effort may include maintaining records, processing notifications or straightforward variations, monitoring compliance information and arranging proportionate verification or audit activity where required.

Moderate accreditation

Moderate accreditation would apply where the department must assess more detailed evidence against specific importing country requirements before granting or varying the accreditation. The department, rather than the importing country authority, would generally make the accreditation decision. The importing country may require the department to confirm that the property has been assessed, or the department may need to notify that authority of the property or provide information about its approval, but a separate assessment by the importing country or approval would not ordinarily be required.

The evidence could include checklists, audit reports, or other technical material demonstrating that the property meets the applicable requirements. The department may need to test the completeness and

currency of that evidence, seek clarification or further information, and confirm that any identified non-compliance issues have been addressed. Because the assurance is market-specific, changes to export operations, products, evidence or importing country requirements may require reassessment or a variation to the accreditation. Ongoing assurance is likely to involve periodic audits, review of supporting evidence and monitoring of continued compliance.

Illustrative example: An Australian manufacturer prepares animal-derived general products for a destination market with detailed property requirements. The accredited property manager submits previous audit reports, process controls and evidence that previous non-compliance issues have been addressed. Departmental officers assess the material against the market requirements, seek clarification where evidence is incomplete and consult technical specialists before deciding the accreditation. Once satisfied, the department may notify the importing country that the property has been assessed; the foreign authority does not separately approve the property. To maintain Moderate accreditation for this market, the property is audited against a checklist specific to the destination market as part of its regular annual audit process.

Departmental effort: Departmental effort is expected to be higher because officers must undertake a substantive assessment of market-specific evidence rather than only confirm basic application details. This may include reviewing questionnaires, audit reports, certifications and requests to address non-compliance; testing evidence against importing country requirements; or consulting technical or market access specialists. The department may also need to notify the importing authority of the property's accreditation. Ongoing effort may include reviewing updated evidence, monitoring audit outcomes, following up non-compliance issues and reassessing the accreditation when requirements, products or operations change.

Complex accreditation

Complex accreditation would apply where the importing country authority must assess, approve or otherwise accept the property before the relevant market access requirements can be met. The department would assess the application and supporting evidence, but cannot approve without the importing country confirming their own approval, which is outside the department's control. The department's role may include confirming that the submission is complete, verifying evidence, endorsing or delivering questionnaires and technical material, responding to requests from the importing authority, and coordinating any further assessment required by that authority.

The process may involve extensive technical documentation, responding to questions, an importing-country desk assessment or physical inspection, and formal addition of the property to a foreign authority's approved establishment list. Timeframes may depend on that authority's processes and priorities. The principal regulatory concern is maintaining the importing country's approval and protecting continuity of market access. After accreditation is granted, the property may need to continue to meet additional notification, audit, inspection, reporting or renewal requirements of the importing country, and changes to the property's export operations or scope may need to be agreed with the importing authority before they can take effect.

In circumstances where an importing country controls its own approval list and must approve the property, the importing country requirement may not be met until that authority provides its approval.

Illustrative example: An Australian manufacturer wants to export an animal-derived general product to a market that only accepts goods from establishments on its official approved list. The property manager completes a technical questionnaire covering the facility, production processes, hygiene controls, traceability and audit history. The department reviews and verifies the questionnaire, works with the business to address gaps, endorses the submission and sends it to the importing country authority. That authority may ask further questions or conduct its own assessment or physical inspection before

deciding whether to list the property. The property cannot use that export pathway until the foreign approval is received and the department has confirmed the relevant accreditation scope.

Departmental effort: Departmental effort is expected to be the highest and may extend over a longer period because the process involves both domestic assessment and engagement with the importing country authority. In addition to reviewing and verifying extensive technical evidence, officers may need to coordinate input from policy, technical, systems or overseas-post staff; prepare, endorse and transmit submissions; manage questions; organise or support a foreign authority assessment or inspection; track the external approval; and update official records once a decision is received. Ongoing effort may include maintaining the foreign listing, coordinating renewals or changes, responding to new conditions, managing incidents that could affect approval and engaging with the importing authority to protect continuity of market access.

Apply for accreditation

Step 1: Set up access to TradeClear

Where accreditation is required, the manager of the property will need to apply through the department's TradeClear online portal. Manual application forms will be available for businesses that cannot access TradeClear. Accredited property applications are proposed to open on 1 July 2027.

Step 2: Complete the application

What you will need to apply:

- details of the entity applying
- details of the property or establishment
- details of the people in management or control
- information about any overdue fees or charges with the department and any repayment plans
- fit and proper person information
- details of the products, export operations and destination markets
- relevant supporting evidence and declarations.

Step 3: Pay the application fee

The applicant will need to pay the applicable accreditation application fee. The proposed fee will depend on whether the application is assessed as Simple, Moderate or Complex.

Step 4: Department assessment and decision

The department will assess the application and supporting evidence against the applicable regulatory and importing country requirements. The department may request further information before making a decision.

If approved, the accreditation will specify the products, export operations and countries covered.

Accreditation period, renewal and variations

Under the current proposal, accreditation would be granted for three years. The accreditation period remains subject to final policy and legislative decisions.

The accredited property manager will need to apply to renew the accreditation before it expires.

If there are relevant changes to an accredited property's export operations, products or export markets, the accredited property manager may need to apply to the department to vary the accreditation. This ensures the accreditation continues to accurately reflect the activities undertaken at the property and that the appropriate regulatory and importing country requirements continue to be met.

A variation application may be required before undertaking activities that are not covered by the existing accreditation.

Using an accredited property when exporting

Before exporting, the exporter will need to confirm whether the export pathway requires activities to prepare prescribed general products including manufacturing or processing, packing, storage or handling—to occur at an accredited property.

Where accreditation is required, the exporter must confirm that the property's accreditation covers the relevant:

- product
- export operation
- destination market.

The exporter may operate the accredited property or source goods from an appropriately accredited property operated by another business. Accreditation attaches to the property and its approved scope, rather than separately to each exporter using the property.

Using an accredited property does not, by itself, confirm that an individual consignment meets all importing country requirements. The exporter must also hold a valid export licence and obtain any required government certificate.

Ongoing responsibilities of accredited property managers

During the accreditation period, the accredited property manager may be responsible for:

- continuing to meet accreditation conditions
- maintaining accurate records
- participating in audits, where required
- addressing non-compliance issues
- notifying the department of relevant changes
- keeping business and contact information current
- renewing the accreditation
- paying applicable fees and charges.

Some properties currently obtain routine audits through industry or third-party audit programs, including programs coordinated by the Australian Renderers Association (ARA), the Pet Food Industry Association of Australia (PFIAA) or the Australian Hide, Skin and Leather Exporters Association (AHSLEA).

Other properties are audited by the department. Under the proposed general products framework, an approved arrangement would be an arrangement between the department and an industry body to

coordinate recognised third-party listing audits. The accredited property manager would engage the industry body or its auditor; the accredited property would not itself hold the approved arrangement.

This differs from approved arrangements used with registered establishments in other commodity frameworks. In all cases, the department remains responsible for assessing the information needed to grant and maintain accreditation, deciding whether requirements are met, and providing appropriate oversight, verification and compliance activities.

The comparison below explains how routine audit delivery and costs may differ between accredited properties that engage an industry body operating under an approved arrangement and those audited by the department. Participation in an industry audit program does not replace the department's assessment or decision-making role and does not remove the departmental application fee or annual accreditation charge. The department may use relevant, current audit evidence from the approved arrangement to avoid unnecessary duplication.

Table 2 Comparison of accredited properties audited under, or outside of, an industry approved arrangement

Feature	Property engaging an industry body under an approved arrangement	Property audited by the department
Who undertakes routine audits	The third-party auditor engaged by the relevant industry body under the approved arrangement undertakes the audit.	The department undertakes the audit.
Audit and assurance costs	The property is responsible for fees charged by the industry body or third-party auditor, the approximately $258.30 annual departmental assurance charge, and any additional chargeable departmental assurance work.	The property is responsible for chargeable departmental audit or assurance work.
Departmental application fee	The proposed application fee applies according to the property's Simple, Moderate or Complex accreditation category.	The proposed application fee applies according to the property's Simple, Moderate or Complex accreditation category.
Annual accreditation charge	The proposed annual accreditation charge applies according to the property's accreditation category.	The proposed annual accreditation charge applies according to the property's accreditation category.
Departmental oversight	The department remains responsible for granting and maintaining accreditation and may undertake oversight, verification or compliance activities.	The department remains responsible for granting and maintaining accreditation and determining the required oversight, verification and compliance activities.

Assurance requirements

Existing assurance requirements for listed establishments are expected to inform the transition to accredited properties. Where a property currently undergoes an annual audit by an industry body or the department, that audit evidence may continue to be used where it remains relevant and is accepted by the department. The department will still assess the information needed to grant and maintain accreditation and decide whether further assurance activity is required.

The frequency and scope of assurance processes would be based on importing country requirements, the products and export operations covered, the accreditation category, the property's compliance history and other relevant risks. Frequency may vary between properties and may change if

requirements, export operations, products or risk settings change. For a property handling multiple products or commodities, the department would seek to coordinate assurance activity (like audit) where practical while ensuring that each applicable regulatory and importing country requirement is addressed.

Audits may be undertaken by the department or by a third-party auditor engaged by an industry body under an approved arrangement. The department will determine the appropriate audit pathway for each property. The property is responsible for applicable departmental audit charges and any fees charged by the industry body or third-party auditor.

Non-compliance and regulatory action

The department will take a proportionate and escalating approach to non-compliance that considers mitigating and aggravating factors. Depending on the nature of the non-compliance, regulatory action may affect the accreditation or the property's ability to undertake particular export operations.

Accreditation may be affected by matters such as failure to comply with accreditation conditions, failure to meet applicable importing country requirements, false or misleading information, overdue fees and charges or failure to address identified non-compliance issues.

Proposed charges

Under the current proposal, an additional annual departmental assurance charge of approximately $258.30 per accredited property would apply only where the property participates in an industry audit program coordinated under an approved arrangement.

This charge is separate from the accreditation application fee, the annual accreditation charge based on the property's category, and any fees charged by the industry body or third-party auditor.

Key risks managed through accreditation

The accredited property framework is intended to manage risks that can extend beyond one exporter or consignment. A failure at property level could affect multiple exporters, future consignments and broader market access.

Table 3 Key risks managed through accreditation

Risk	Possible consequence	How accreditation helps manage the risk
Incomplete records or administrative controls	Delay, non-compliance or inability to support export certification	Establishes conditions, record-keeping expectations and evidence requirements
Failure to comply with accreditation conditions	Restrictions, suspension, variation or revocation of accreditation	Provides formal compliance and enforcement mechanisms
Failure to meet importing country requirements	Goods or the property may become ineligible for a market and/or competent authority approval may be lost	Links accreditation to specified products, export operations and markets
Inadequate controls over manufacturing or processing, packing, storage or handling	Incorrect certification or rejection of consignments	Allows the department to assess property controls and conduct assurance activities
Suspension or withdrawal of approval by an importing country authority	Exports from the property may cease	Supports monitoring and management of foreign approval requirements

Failure affecting exporters that use the same property	Disruption across multiple businesses or supply chains	Provides property-level oversight rather than relying only on individual consignments
Loss of confidence in Australian assurance arrangements	Wider market access and reputational consequences	Supports consistent government assurance and regulatory intervention

Practical steps

For exporters	For accredited property managers
• Identify whether accreditation is required. Check whether the product, destination and export pathway require relevant export operations to occur at an accredited property. • Identify the relevant properties and export operations. Identify each property involved in manufacturing or processing, packing, storing or handling the goods. • Check the scope of accreditation. Confirm that each property is accredited for the relevant product, export operation and market. • If accreditation is not held, contact the property manager. The manager, not the exporter, must decide whether to apply for or vary the property's accreditation. • Monitor departmental guidance. Check final requirements, commencement dates and published product–operation–market combinations.	• Identify the required scope. Determine the products, export operations and markets the property needs to cover. • Prepare an application or variation. Apply through TradeClear, or use the available manual process where TradeClear cannot be accessed, and provide the required supporting evidence. • Maintain compliance. Meet accreditation conditions, keep records current and address non-compliance issues. • Notify relevant changes. Seek a variation before undertaking activities outside the approved scope and keep management, contact and business information current. • Participate in assurance activities. Complete required audits, inspections or verification and pay applicable fees and charges. • Renew and prepare for transition. Renew before expiry and, for existing listed establishments, prepare to transition within the applicable timeframe. • Monitor departmental guidance. Check final application, audit, charging and transition arrangements.

Example scenarios

The following examples illustrate how the proposed framework may operate. Final requirements will depend on the published product, export operation and market combinations and applicable importing country requirements.

Scenario 1: Exporter operating its own manufacturing and packing property

The property manager would need to check whether those export operations require accreditation for the relevant product and market. If required, the property's accreditation would need to cover the manufacturing and packing operations, product and destination market.

Scenario 2: Exporter using a third-party property

The exporter does not apply for accreditation on behalf of a manufacturer, packer, processor or warehouse operated by another business. The exporter must confirm that any export operation required to occur at an accredited property is covered by that property's accreditation for the relevant product, export operation and market. If the required scope is not held, the exporter should contact the property manager, who may choose to apply for or vary the accreditation.

Scenario 3: Multiple exporters sourcing goods from the same property

Accreditation would attach to the property and its approved scope, rather than separately to each exporter. Once a property has been accredited for a particular combination of product, export operation and market, those goods may be exported by any licensed exporter. Each exporter would remain responsible for confirming that the property's scope covers its goods and export pathway.

Scenario 4: Accreditation covering several products, markets or categories

A single property accreditation may cover multiple product, export operation and market combinations. The property manager would need to ensure that each relevant combination is included in the approved scope. Under the current cost proposal, one annual charge would apply at the highest relevant complexity category, reflecting the expectation that assessment at that level would generally cover the work needed for lower categories. This approach remains subject to final confirmation through the charging and accreditation guidance.

Scenario 5: Export pathway without required government oversight at the property

If the product, export operation and destination do not require Australian Government oversight of export operations at the property, accreditation is not required for that export pathway.

Summary

- An accredited property is a property approved to undertake specified export operations for particular products and markets.
- Accreditation will be required only where it is necessary to meet the applicable regulatory and importing country assurance requirements.
- Relevant existing establishment listings are expected to transition to accredited properties.
- Exporters can source goods from an accredited property operated by another business.
- The proposed categories are Simple, Moderate and Complex, reflecting differences in regulatory effort and assurance requirements.
- Accredited properties may be subject to audits or other assurance activities.
- Property managers will have ongoing responsibilities, including maintaining compliance, keeping records, notifying changes and participating in audits where required.
- Exporters remain responsible for ensuring their goods meet importing country requirements and use an appropriately accredited property where required.

- Applications are proposed to open through TradeClear from 1 July 2027, with accreditation proposed to become mandatory from 1 July 2028, subject to the applicable transition arrangements.
- The proposed accreditation period of effect is three years.
- The arrangements remain subject to government consideration, legislative approval and final implementation decisions.