Australian Government
Department of Agriculture, Fisheries and Forestry

Understanding export licences for general products

Purpose of this paper

We are developing a new regulatory framework for the export of general products. Under the proposed framework, every person or entity responsible for exporting prescribed general products from Australia will need to hold a valid general products export licence before exporting once the relevant tranche commences.

This paper explains:

- what a general products export licence is
- who will need a licence
- what a licence will cover
- how licence applications and assessments are expected to work
- when licensing requirements are proposed to commence
- the responsibilities of licence holders
- how licences interact with accredited properties and government certificates
- the proposed charges and key risks managed by licensing.

What is a general products export licence?

An export licence is a regulatory tool used by the department to authorise a person or entity to export prescribed general products as described below from Australia. It identifies the person or entity responsible for the goods at the time of export and establishes a clear point of accountability under the proposed framework.

The licence provides evidence that the department has assessed the applicant against relevant legislative requirements, including fit and proper person considerations and overdue fees or charges, and that the licence holder has agreed to meet applicable export obligations and licence conditions.

A licence supports the department to:

- identify and communicate with active exporters
- improve traceability and accountability across the export supply chain
- monitor compliance with Australian export legislation and importing country requirements
- respond to emerging market access issues and post-export matters
- take proportionate regulatory action where necessary
- support a stronger basis for government export assurance.

Who will need an export licence?

All exporters of prescribed general products will need a valid general products export licence before exporting. Prescribed general products are goods within the nine product groups listed below that are prescribed by the legislation. The licence must be held by the person or entity responsible for the goods at the time of export. A manufacturer, processor, packer, warehouse or other supplier does not need an export

licence if they solely prepare goods for another business to export, although separate accredited property requirements may apply to the premises.

General products will be comprised of nine product groups:

- **Rendered products** – including protein and bone meals, inedible tallow and spray-dried blood
- **Animal food** – including pet food, stockfeed and feed additives (except for minerals)
- **Skins and hides** – including raw and preserved hides
- **Honeybee products** – including honey, beeswax, royal jelly and propolis
- **Wool and wool grease** – including greasy, scoured and carbonised wool, and wool grease
- **Feathers** – including untreated feathers and feathers that have been cleaned or sterilised but not further processed
- **Pharmaceutical products** – products of animal origin intended for the manufacture of medical products or veterinary medical products, such as bovine pericardium
- **Animal blood products** – animal blood products including plasma, antisera and foetal bovine serum
- **Food and beverages** – broadly covering food and drinks, including ingredients, but excluding alcohol. This also includes edible products when not prescribed by other export control rules, such as edible tallow, duck eggs, or fish oil capsules.

Not all goods currently treated as non-prescribed goods will become prescribed general products. Exporters will need to confirm whether their goods are prescribed general products.

What will an export licence cover?

A general products export licence will cover all prescribed general products exported by the licence holder. An exporter will not need separate licences for different general product groups or destination countries.

For example, a licensed exporter of rendered products will not need to obtain a second general products licence if they later begin exporting prescribed animal blood products or food and beverages. Their existing licence would continue to cover these prescribed general products, provided they continue to meet all applicable legislative requirements.

A general products export licence will be separate from licences held under other commodity-specific frameworks. An existing or future meat, livestock or other export licence will not authorise the export of prescribed general products because each framework has different legislative requirements, controls and assurance obligations.

How is an export licence different from other regulatory controls?

Table 1 Comparison of regulatory controls

Regulatory control	What it does	When it applies
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.
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.

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.

Holding an export licence does not remove the requirement to use an accredited property or obtain a government certificate where an importing country requires those additional controls to apply. Similarly, operating an accredited property does not remove the requirement for the responsible exporter to hold an export licence.

When will export licences be required?

Applications are proposed to open through TradeClear from 1 July 2027. Licensing requirements will then be introduced in phases. Exporters of prescribed general products must hold a general products export licence from the applicable commencement date in Table 2, or before they first export those goods after that date.

Table 2 Proposed licensing commencement dates

Tranche	Proposed commencement	Product groups
1	1 November 2027	Rendered products, animal food, skins and hides
2	1 April 2028	Honeybee products, wool and wool grease, feathers, pharmaceutical products and animal blood products
3	1 April 2029	Food and beverages

These dates are indicative and may change. Exporters should apply early enough for the department to assess the application before the licence is required. The proposed assessment period is up to 120 calendar days.

How do I apply?

Step 1: Set up access to TradeClear

Most applicants will apply through the department's TradeClear online portal. The person or entity must be linked to the relevant account, and people acting for the person or entity must have the appropriate authority. A manual application pathway will be available where an applicant cannot access TradeClear.

Step 2: Complete the application

The application is expected to request:

- entity details, including business name, ABN where applicable, address and contact information
- details of people in management or control, including their role and identifying information
- information about any overdue fees and charges and any repayment arrangements
- responses to fit and proper person questions
- relevant declarations, including consent and acknowledgement that providing false or misleading information may be an offence.

The applicant and licence holder will generally be the legal entity or individual responsible for conducting the export business, not the person who merely completes the application on its behalf.

Step 3: Pay the application fee

We propose a flat application fee because the assessment effort is expected to be broadly consistent across applicants. The fee would be payable at the time of application submission and would recover the cost of assessing the application regardless of whether a licence is granted.

Step 4: Department assessment and decision

We will assess whether the applicant meets the relevant legislative requirements. This is expected to include consideration of fit and proper person information, overdue fees or charges, application declarations and any other relevant information. We may request further information to assist with our assessment.

If granted, the applicant will be notified of the grant, licence number, commencement date, expiry date and status, which will also be recorded in the relevant systems.

Licence period, renewal and changes

We propose that a general products export licence remains in force for five years. The licence holder will need to apply to renew it within the timeframe set out in the legislation. The five-year period is intended to reduce administrative burden for licence holders.

Because the licence covers general products broadly, exporters will not need to vary the licence to add new products or destination markets. A variation may still be needed where relevant licence details or conditions need to change, but the holder of a licence cannot be changed by variation. The licence holder should notify the department promptly of relevant changes, including changes to entity details or people in management or control.

The department may grant, renew, vary, suspend or revoke a licence in accordance with the legislation. A licence holder may also request suspension or revocation.

Using the licence when exporting

The export licence is expected to provide the link between the licensed exporter and export declarations. The licence number is planned to be included as part of the export declaration for general products in the Australian Border Force Integrated Cargo System (ICS). Exporters can also use the Single Electronic Window in NEXDOC to complete export declarations alongside applications for government certificates.

Before exporting, the licence holder must ensure that the goods are eligible for export, relevant importing country requirements are met, required property accreditation is in place, and any necessary government certification has been obtained.

Ongoing responsibilities of licence holders

During the licence period, the licence holder will be responsible for:

- continuing to satisfy licence conditions and applicable legislative requirements
- ensuring prescribed general products are not exported unless the licence is valid
- meeting applicable importing country requirements
- sourcing from an appropriately accredited property where required
- obtaining government certification where required
- maintaining accurate records and providing information when requested

- keeping business and contact information current
- notifying the department of relevant changes
- paying applicable fees and annual charges
- addressing non-compliance issues promptly
- applying to renew the licence within the timeframe set out in the legislation.

Non-compliance and regulatory action

We take a proportionate and escalating approach to non-compliance that considers mitigating and aggravating factors. Depending on the circumstances, the department may consider education or guidance, additional conditions, increased monitoring, refusal or revocation of a government certificate, variation, suspension or revocation of the export licence, and civil or criminal enforcement action for serious breaches.

A licence may be affected by matters such as serious or repeated non-compliance, overdue fees or charges, false or misleading information, failure to meet licence conditions or failure to remain a fit and proper person. The appropriate response will depend on the facts of the case and the source of the non-compliance.

Key risks managed through licensing

Table 4 Key risks managed through licensing

Risk	Possible consequence	How licensing helps manage the risk
The department cannot identify active exporters	Delayed communication and reduced ability to respond to market access changes or incidents	Creates a current record of licensed exporters and responsible entities.
An unsuitable entity exports regulated goods	Non-compliance with importing country requirements, leading to reputational consequences or loss of market access	Allows assessment of fit and proper person matters and relevant overdue fees and charges before approval, and ability to revoke approval if suitability changes.
Exporter responsibilities are unclear	Gaps in accountability and inconsistent compliance	Places clear obligations and conditions on the person or entity responsible at export.
Goods are exported without meeting requirements	Detention, rejection, corrective action or loss of market access	Provides a basis for oversight, monitoring and proportionate regulatory action.
False or misleading information is provided	Incorrect approvals or export assurance	Supports refusal, variation, suspension, revocation and enforcement where appropriate.
The exporter cannot be linked to a consignment	Reduced traceability and difficulty investigating post-export issues	Links a licence number and exporter identity to export and certification systems.

Practical steps for exporters

1) **Identify whether your goods are in scope of the reform**
   Exporters should confirm whether their goods will become prescribed general products and when the proposed licensing requirements are proposed to commence.

2) **Identify the entity that will hold the licence**
   The licence holder will generally be the legal entity or individual responsible for the goods at the time of export, rather than the manufacturer or brokers or agents who act on the exporter's behalf. Businesses operating through related entities, subsidiaries, trading names or overseas arrangements should identify which legal entity conducts the export business and ensure any person acting on its behalf has the appropriate authority.

3) **Apply early and prepare the required information**
   Exporters should allow sufficient time for the department to assess an application before the licence becomes mandatory for their goods. The proposed assessment period is up to 120 calendar days.

   Applicants should be prepared to provide accurate information about the responsible entity, people in management and control, overdue fees or charges, and fit and proper person requirements, and respond promptly to requests for further information. Exporters should also ensure they can access TradeClear and appropriately authorise any staff or representatives who will act on its behalf.

4) **Plan how the licence will be used**
   Exporters should ensure the licence number is correctly linked to export declarations in the ICS and government certificate applications. A broker or agent may act on behalf of the exporter where appropriately authorised, but the licence holder remains responsible for meeting its obligations and ensuring the licence remains current. Exporters should also confirm whether accredited property or government certificate requirements apply to their goods, export operations and destination markets.

5) **Keep the licence up to date**
   Licence holders should promptly notify the department of relevant changes, including changes to business details or people in management or control. The holder of a licence cannot be changed by variation. Licence holders should apply to renew within the timeframe set out in the legislation and contact the department if they stop exporting or their business structure changes.

6) **Understand the full cost and ongoing obligations**
   In addition to the licence application fee and annual charge, exporters may incur costs for licence variations, accredited property approvals, audits, government certificates, or other regulatory services, depending on their operations and destination markets. Exporters should also maintain accurate records, keep business and contact details current, and meet all licence conditions and importing country requirements.

7) **Further details will be provided ahead of commencement**
   Transitional arrangements and detailed processes for invoicing, renewal, review of decisions, record retention and support services remain subject to consultation and final implementation decisions. The department will provide guidance and practical support to help exporters prepare as these arrangements are finalised. Exporters should monitor further departmental guidance on transition arrangements, renewal processes and implementation support.

Example scenarios

Scenario 1: Exporter of one general product

An entity exports prescribed pet food after the Tranche 1 commencement date. The entity responsible for the goods at export must hold a general products export licence. If the importing country also requires a government certificate or for the goods to be prepared at an accredited property, the exporter must ensure those requirements are met.

Scenario 2: Exporter expands into another product group

A licensed exporter of rendered products later begins exporting prescribed animal blood products. The exporter does not need another general products export licence because the existing licence covers all prescribed general products. They must still meet the requirements applying to the new goods and markets.

Scenario 3: Manufacturer supplies a separate exporter

A manufacturer prepares goods that are exported by another entity. Only the entity responsible for the goods at export needs the export licence. The manufacturing property may also require accreditation where property-level oversight is required for those goods, export operation and destination market combinations.

Scenario 4: Business already holds a meat export licence

A business exports both prescribed meat and goods that will become prescribed general products. It will need to retain its meat export licence and obtain a separate general products export licence because the licences operate under different commodity frameworks.

Summary

- All exporters of prescribed general products will need a valid general products export licence prior to exporting those goods once the relevant tranche commences.
- The licence establishes clear regulatory accountability by identifying the person or entity responsible for the goods at the point of export.
- One licence will cover all prescribed general products.
- The licence will be separate from accredited property approvals, government certificates, and export licences issued by other regulatory programs.
- Applications are proposed to open through TradeClear from 1 July 2027, with licensing requirements phased in from November 2027 to April 2029.
- The proposed licence period of effect is five years.
- These arrangements remain subject to government consideration, legislative approval and final implementation decisions.