



Plant Export Operations Branch

Plant Export Operations Manual

Volume 7A: Export Compliant Goods Storage

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Introduction

Export Compliant Goods Storage (ECGS) is an approved receptacle within a registered export establishment where Export Compliant Goods (ECG) are stored prior to export. ECGS registered export establishments can 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, or a period approved by the Secretary. The receptacle is to be cleaned frequently and must be documented in cleaning and hygiene procedures of the establishment. However, for a back to back loading, any leftover goods are to be inspected by an Authorised Officer (AO) by taking representative samples against the potential importing countries requirements. The flow path from the point of sampling to the ECGS must be inspected and passed by an AO prior to loading export compliant goods into an ECGS. The goods must be inspected by an AO and be passed as export compliant before ECG can be transferred into ECGS. The receptacle is then to be secured to maintain the phytosanitary integrity of the ECG until time of export. An AO must pass the flow path from ECGS to point of export/transport prior to loading into a vessel or a container for export. When the ECG are to be exported within 28 days of first inspection, or a period approved by the Secretary, no further inspection is required at the time of export.

This volume details the overarching requirements and procedures for the approval and certification of ECGS within registered export establishment premises. The volume applies to registered export establishments that have been approved by the Department of Agriculture, to use ECGS as an alternative to current end point inspection methods. Registered export establishments must meet strict prerequisites and ongoing audit requirements to pass the application process and become an ECGS registered export establishment. Storages capable of maintaining the integrity of ECG qualify for ECGS approval and receptacles which cannot maintain the integrity of ECG during storage may not qualify for ECGS approval. ECGS approval is only for prescribed goods. Refer to [Reference Guide Export Compliant Goods Storage \(ECGS\)](#) and [Export Compliant Goods Storage \(ECGS\) Hazard Identification and Mitigation Survey](#) for more detailed information.

ECGS prerequisite and application requirements

The occupier/operator of the registered export establishment must apply in writing on an [approved form](#) to have fixed areas within an establishment approved for ECGS. Establishments applying for ECGS must be able to demonstrate a consistent history of good operating practices through the maintenance of high standards of cleanliness and minimal goods contamination. Only registered export establishments that have maintained excellent audit results and have not had any major corrective actions in the last six months at the time of seeking approval for ECGS will be considered. However, export establishments registered for less than six months at the time of seeking approval are also eligible to apply for ECGS and if accepted will be granted a provisional approval for six months or until outcomes from audits demonstrate compliance.

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Prerequisite requirements

This section contains prerequisite requirements for an ECGS registered export establishment. Only registered export establishments that meet the following mandatory requirements will be eligible to apply for ECGS.

Registered Export Establishment

Premises must be registered under the *Export Control (Prescribed Goods – General) Order 2005* and meet all the requirements of the legislation as a registered export establishment.

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 re-infested once they have been passed as export compliant by an AO. An approved, documented and auditable cleaning process for the receptacle must be provided. Transportation and storage records at the ECGS establishment must be documented.

Equipment Use

Any equipment used at the ECGS establishment must be maintained in a manner that prevents contamination of ECG. Equipment must be able to be visually inspected and maintenance records documented.

Sanitation and Pest Control

All elements must be monitored and controlled and the establishment is to maintain appropriate records of sanitation and pest control measures and activities. The hygiene process and pest management system must be documented.

Work Health and Safety

The establishment must have a defined work health and safety policy and documented procedures to ensure the safety and health of staff and visitors.

Contingency Arrangements

The establishment must have a defined and documented procedure and policy for diverting non-compliant goods (NCG) away from ECGS so they do not compromise the integrity of ECG.

Documented Inventory System

The registered export establishment seeking approval for ECGS must maintain accurate records and traceability for all receivals, treatments, outturn, and operational processes through the facility.

Sampling System

The goods sampling system and procedures must meet the requirements of the legislation and include collection systems capable of delivering a representative sample and suitably maintaining its integrity for live pest inspection.

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Hazard Identification and Mitigation Survey (HIMS)

All steps in the ECGS process must be assessed to consider the risk of contamination. Potential hazards and consequences need to be identified and preventative measures implemented to minimise or eliminate those risks. The risk analysis must use HIMS to manage all possible risks and the likelihood of their occurrence. Refer to [Export Compliant Goods Storage \(ECGS\) Hazard Identification and Mitigation Survey](#) for details.

Application Requirements

Application Form and Process

The occupier/operator of a registered export establishment seeking approval for ECGS must submit an application on an approved form to the Grain and Seed Exports Program. Application for approval must be in writing on an [approved form](#) and no verbal applications will be accepted. The registration process (or re-registration) begins when the occupier/operator of the establishment submits an “Application for Registration or Notification” to the Department of Agriculture.

Layout of the Establishment

A site map and aerial map of the establishment showing locations of major items such as inspection point, flow path from inspection point to ECGS, proposed ECGS and flow path from ECGS to the point of export or transport must accompany the application.

Process Flow Paths Chart

A process flow chart including inspection point, product flow from point of inspection to ECGS, from ECGS to the point of export, transfer of rejected goods into hospital bins/alternative, etc. must be provided.

Conditions of Approval

Following are mandatory conditions associated with the approval of ECGS:

- industry to submit ECGS proposal in line with ECGS prerequisites and guidelines
- previous performance of existing registered export establishments will be assessed, sites recently registered as export establishments with no previous audit records may be subject to additional surveillance/audits
- initial desktop assessment to occur on receipt of the application which will be followed by on-site assessment
- registered export establishment with approved ECGS details to be entered into Plant Export Management System (PEMS), when functional, and Export Register Database (ER)
- a 12 month provisional approval may be granted to an establishment with previous history of audits subject to audit findings and a 6 month provisional approval may be granted to newly registered establishment with no past audit records and
- any follow up audits of an approved ECGS will be conducted in conjunction with registered export establishment audits in accordance with the Plant Export Operations Branch (PEOB) Audit Policy.

Non-successful Applicants

Non-successful applicants will need to re-submit applications and undergo re-inspection before being considered for approval as an ECGS registered establishment. In cases where an

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audit report result is the reason for rejection, the establishment will need to undergo a further 6 month audit period to determine suitability for ECGS in any future applications.

Figure 1 explains the process involved in the assessment and approval of a registered export establishment for ECGS. Refer to *Reference Guide Export Compliant Goods Storage (ECGS)* for further clarification and details.

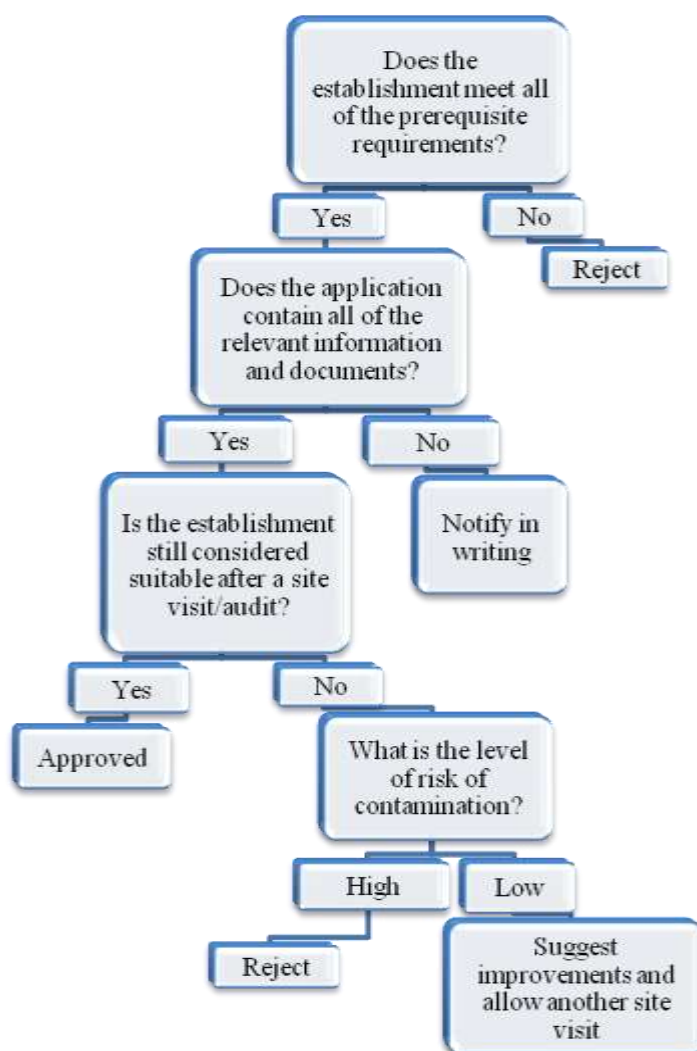


Figure 1: Processes involved in the assessment and approval of registered establishment for ECGS

Export Compliance

All ECGS sampling, inspection and storage must be carried out at a registered export establishment.

The current inspection and sampling principles applied for prescribed goods are to be used for sampling and inspection of prescribed goods intended to be stored in an ECGS. Refer to relevant commodity Work Instructions for details. The following resources are useful for inspection and sampling criteria:

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- Schedule 2 Inspection of prescribed goods: Export Control (Plants & Plant Products) Orders 2011.
- Plant Exports Operations Manual (PEOM) and relevant Work Instructions

Export compliance period

Prescribed goods that are inspected and passed as export compliant remain compliant for 28 days. In exceptional circumstances, the period of export compliance can be extended beyond the 28 days.

To extend the period of compliance the exporter will need to provide details supporting the request to the Department of Agriculture, Grain and Seed Exports Program before the end of the initial 28 day period. The exporter must supply details of the exceptional circumstances for which an extension is required, a justifiable period of extension, and information that gives assurance that the condition of the goods has not changed since inspection and that there has been no compromise of the phytosanitary status of the goods, including the security. Once a decision is made the Grain and Seed Exports Program will inform the exporter of the decision and the National or Regional Documentation Hub Manager or Supervisor will be informed to make a record of the additional approved period.

Inspection requirements

A notice of intention must be lodged with the Department of Agriculture prior to inspection of goods intended to be stored in an ECGS. The inspection must be conducted against the most stringent import conditions of all the potential markets the exporter may be intending to export the goods. A separate RFP has to be raised by the exporter if the export compliance goods stored in an ECGS are to be exported to market other than the one against which the goods were inspected and passed.

Post inspection

Compliance

If the goods are passed as export compliant after inspection, AOs must assess the required documentation prior to forwarding export documentation to the Department of Agriculture.

Storage

The ECGS receptacle must be secure and constructed in a way that will not undermine the pest, disease and export compliant status of the prescribed product during the storage period.

Traceability

Traceability of the goods intended for export must be maintained and it is the responsibility of the export registered establishment to maintain accurate records.

Audit

Audits for ECGS registration will be conducted in conjunction with registered premises audits in accordance with the PEOB Audit Policy. Audits will be comprised of a complete review of

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ECGS facility operations and procedures to verify that registered export establishment continues to meet the requirements of ECGS.

Frequency

The standard regime for ECGS is an annual periodic audit conducted in conjunction with the registered export establishment audit. In addition, the export establishment may be subject to surveillance and desk audits at a frequency determined by Plant Export Operations. The frequency of audits is primarily based on performance and can be scaled up for establishments with marginal performance since approvals were granted for ECGS.

Audit Types

A combination of periodic (annual), surveillance and desk audits may be used to monitor compliance in line with the audit policy.

Auditor Accreditation

The Plant Export Operations auditors will be deemed to be a qualified person if they meet requirements under subsection 45.5 of Export Control (Plant and Plant Products) Order 2011. The auditors are required to undertake specific training to achieve competencies identified in the Plant Export Training Framework. Auditors must be employees of the Department of Agriculture who are accredited and hold appropriate qualifications.

Non Compliances

Major non-compliance may result in the suspension and cancellation of ECGS. Refer to Reference Guide - Export Compliant Goods Storage for details.

Suspension of ECGS Approval

The secretary, or a delegate of the secretary, has authority to suspend or revoke approval of ECGS under Export Legislation. A Department of Agriculture officer may recommend the delegate of the Secretary to:

- suspend or revoke ECGS approval
- suspend a particular export operation for which approval was granted for
- determine the period of suspension.

Grounds for suspension of approval

Suspension for approval may be given in writing where a Department of Agriculture officer has reasonable grounds to believe that requirements according to legislation that may impact on the integrity of the goods are not being met, in relation to:

- the condition of ECGS
- product flow paths
- prescribed goods stored in ECGS
- any other major non-compliance issue

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Reinstatement of suspended entities

ECGS suspended due to failing an audit will only be reinstated if the ECGS passes a follow-up audit. It is the responsibility of the occupier of the ECGS to organise a follow up audit with Plant Export Operations.

Cancellation

The registered establishment must notify the Department of Agriculture of any changes to the scope of the approved ECGS. Any major changes in the operation and management of the establishment may result in cancellation/suspension of ECGS and the registered export establishment would be required to apply for re-registration. Any change in the operators/ownerships of the establishments must be provided to Department of Agriculture in writing and ECGS approval may not be cancelled or suspended if all the critical agreed processes are not significantly altered. When the status of a registered export establishment with approved ECGS has been cancelled/ suspended, all uses of ECGS shall cease immediately. AOs must ensure that the registered establishment is approved for ECGS before conducting inspection of goods for export compliance.

Suspension at request of Occupier/Withdrawal

The occupier of a registered establishment with ECGS approval must advise Plant Export Operation in writing if the ECGS facility ceases to operate or no longer has a need for the ECGS. If an occupier of an establishment with approved ECGS wishes to withdraw voluntarily, he/she must notify Plant Export Operation in writing and the ECGS register will be amended to reflect this change. An ECGS voluntary withdrawal will only be reinstated if the ECGS passes a fresh audit. It is the responsibility of the occupier of the ECGS to organise a new audit with Plant Export Operations.

Related Material

Export Control (Plants & Plant Products) Order 2011
(<http://www.comlaw.gov.au/Details/F2014C00830>)

Plant Exports Operations Manual (<http://www.daff.gov.au/biosecurity/export/plants-plant-products/plantexportsmanual>)

Work Instructions (<http://www.daff.gov.au/biosecurity/export/plants-plant-products/plantexportsmanual/resources#work>)

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