



WORK INSTRUCTION

Inspecting cotton for export

Direction to staff

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

Direction to authorised officers

Authorised officers must perform services in accordance with any lawful directions or instructions issued by the department.

Summary of main points

This document outlines:

- pre-inspection tasks
- flowpath inspection tasks
- sampling tasks
- inspection tasks
- pass or failure procedure
- reinspection procedures
- documentation requirements.

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Purpose of this document

This document details the procedure for inspecting following cotton commodities:

- raw baled cotton
- mote baled cotton
- cotton modules/unprocessed cotton.

Definitions

All terms used in this document and their definitions are captured in the Guideline: [Inspection of cotton for export](#) (the guideline).

Policy statement

- The policy and process related to this work instruction can be found in the guideline. Authorised officers (AOs) must read and comply with the policy and process requirements set out in the guideline and relevant legislation.
- Prior to conducting an inspection, the AO must have achieved competency in the job function RBC3001.
- This document must be used in conjunction with the importing country's requirements (ICRs) listed in import permits, [protocols](#), [work plans](#) and the Manual of Importing Country Requirements ([Micor](#)).

Note: Where the importing country requirements (ICRs) contradict the requirements in this document, the ICRs must take precedence.

Bulk into vessel loading operations

Occupiers of registered establishments must submit a loading proposal and standard operating procedure (SOP) for approval to undertake bulk into vessel loading operations. AOs may be required to carry out additional tasks under the SOP.

Legislative framework

The legislation that applies to the phytosanitary inspection of cotton for export can be found in the guideline.

Roles and responsibilities

The following table outlines the roles and responsibilities undertaken when inspecting cotton for export.

Role	Responsibility
Inspection AOs	<ul style="list-style-type: none">• Validating supporting documents.• Inspecting cotton products for export.• Recording and submitting the results of the inspection.

Work Health and Safety

Inspection AOs must:

- read and be familiar with the Reference: [Work health and safety in the plant export environment](#)
- read, consider and comply with work health and safety (WHS) requirements set out in the guideline

- not enter work sites unless it is safe, they are wearing the required personal protective equipment (PPE) and have considered any WHS hazards
- comply with applicable Commonwealth, state and territory WHS legislation
- comply with WHS requirements of employers and third-party sites, unless they assess the requirements as placing them at risk, in which case they must take reasonable action to ensure their safety.

Personal protective equipment

Inspection AOs must wear the following PPE:

- hi-visibility vest
- safety boots
- gloves
- hard hat.

Inspection AOs must have the following PPE with them and use when required:

- first aid kit
- water
- sunscreen
- appropriate emergency communication equipment such as a phone carrier with coverage or satellite phone.

An AO must wear the following PPE where required by the work site or where they have identified a risk in the work environment:

- long sleeve clothing
- steel cap boots
- hearing protection
- face mask
- portable gas detector.

Note: For more information regarding WHS responsibilities, see the Reference: [Work health and safety in the plant export environment](#).

Essential equipment

AOs must have the following inspection equipment:

- knife and scrapers
- hammer/mallet and chisel
- torch
- tweezers and probes
- hand lens 10x magnification or more
- small artist's paint brush
- vials and tubes
- 80 percent ethanol preservative
- snap-lock plastic bags
- labels
- pencils for labelling vials and pens for completing forms
- a device with access to the Plant Exports Management System or manual inspection record for contingency purposes.

Note: For more information regarding the inspection equipment, see the Reference: [Plant export guide – equipment](#).

System requirements

AOs must have access to the following systems:

- department website
- Manual of Importing Country Requirements (Micor)
- Plant Exports Management System (PEMS)
- Electronic Export Documentation System (EXDOC) (for departmental AOs only).

Conduct pre-inspection tasks

- Receive a request for an inspection of raw baled cotton consignment.
- Check if there is a case in Manual of Importing Country Requirements (Micor) Plants for each product.
 - If there is not a case in Micor Plants, you cannot continue with the inspection.
 - Advise the client that they need to obtain the import requirements from the importing country authority and email these to the Micor Plants administrator. The import requirements will need to be assessed and Micor Plants updated before the consignment can be inspected.
- Check the Micor Plants case for each product to see if the importing country authority requires an import permit.
 - If an import permit is required and has not been provided you cannot continue with the inspection.
 - Advise the client that they need to present an import permit before the consignment can be inspected.
- If an import permit is required and has been provided at the time of inspection you need to check it is valid as per the Guideline: [Supporting documents for plant exports](#).
 - If the import permit is not valid you cannot continue with the inspection.
 - Advise the client that they need to obtain a valid import permit before the consignment can be inspected.
- Check the import requirements on the import permit match the Micor Plants case for each product.
 - If the import requirements do not match you cannot continue with the inspection.
 - Advise the client that they need to email the import permit to the Micor Plants administrator. The import permit will be assessed and Micor Plants updated before the consignment can be inspected.

Note: If you are a departmental inspection AO then you do not have to complete the following step as this has been done for you by the appointment AO.

If you are a third-party inspection AO:

- Check what form the NOI must be presented in as per the Guideline: [Issuance of certification for plant exports](#).
 - If the client has not presented the correct form of NOI you cannot continue with the inspection.
 - Advise the client that they must present the correct form of NOI before the consignment can be inspected.
- If the NOI is a Request for Permit (RFP) check that it is at either initial (INIT) or final (FINL) status.

- If the RFP is not at either INIT or FINL status you cannot continue with the inspection.
- Advise the client that they must present the RFP in the correct status before the consignment can be inspected.
- If the NOI is an EX28 check that it has been completed correctly as per the Work Instruction: [Preparing a declaration and certificate as to condition \(EX188\) for plant exports](#).
 - If the EX28 has not been completed correctly you cannot continue with the inspection.
 - Advise the client that they must present a correctly completed EX28 before the consignment can be inspected.
- If the NOI is an EX28 check that the export registered establishment (ERE) on the NOI is currently registered by requesting the most recent Certificate of Registration for the ERE from the client or by checking with the department's regional office.
 - If the ERE is not currently registered, you cannot continue with the inspection.
 - Advise the client that they must use an ERE to export.
- Check that the ERE has one or more of the plant export registered operations as per the Reference: [Registered operation codes for plant export registered establishments](#).
 - If the ERE does not have one or more plant export registered operations, you cannot continue with the inspection.
 - Advise the client that the ERE must be registered to inspect and prepare cotton before the consignment can be inspected.
- Check whether the client needs to complete any manual certification as per the Micor Plants case, that they have used the correct template and that the template has been completed correctly as per the
 - Reference: [Completion of a Phytosanitary Certificate \(E16\) User Guide](#)
 - Work Instruction: [Preparing a declaration and certificate as to condition \(EX188\) for plant exports](#)
 - Reference: [Completion of a Certification as to Condition \(EX46A\) User Guide](#)
 - Reference: [Completion of a Phytosanitary Certificate for Re-Export \(EX25\) User Guide](#)
 - Work Instruction: [Preparing a radioactivity statement certificate for plant exports](#).
 - If these certificates have not been completed correctly you cannot continue with the inspection.
 - Advise the client that they need to complete the certificate correctly before the consignment can be inspected.

Note: The following steps apply to both departmental and third-party inspection AOs.

- Check that you have received all supporting documents required prior to inspection as per the Reference: [Plant export documents and treatments checklists](#) and the Micor Plants case/s.
 - If all the supporting documents have not been received, you cannot continue with the inspection.
 - Advise the client that they need to obtain the supporting documents before the consignment can be inspected.
- Check that the supporting documents you have received are valid as per the Guideline: [Supporting documents for plant exports](#).
 - If any of the supporting documents are not valid you cannot continue with the inspection.
 - Advise the client that they need to obtain valid supporting documents before the consignment can be inspected.
- Before commencing the inspection, you must have
 - access to PEMS or a manual inspection record

- inspection equipment that is fit for purpose
- any instructional or reference material you may require.
- Check site specific WH&S requirements and collect your personal protective equipment.

Conduct flowpath inspection tasks

Inspect entire flowpath

- To ensure it is **fit-for-purpose** by
 - ensuring that any live pests cannot cross-infest the goods
 - ensuring that any vermin and/or their waste cannot cross-contaminate the goods
 - ensuring any contaminants cannot cross-contaminate the goods
 - ensuring any tolerances specified by the importing country are adhered to
- This inspection must be undertaken each time you arrive onsite to start an inspection or as approved in the PEOM

Inspection area

- You must be satisfied that the point of inspection is fit-for-purpose as outlined above and
 - allows for the safe and effective inspection of prescribed goods
 - allows you to conduct inspections unimpaired both visually, physically and environmentally.

Commodity flowpath

- You must be satisfied that the commodity flowpath is fit for purpose by
 - inspecting the commodity source/storage area
 - inspecting the commodity conveyance systems.

Pass the flowpath

- Pass the flowpath if you are satisfied that all relevant tolerance levels have been met.
- Record passed flowpath and the time it was passed in PEMS or on the manual inspection record.

Fail the flowpath

- If you identify an issue that **will be rectified whilst you are onsite** you must
 - record failed flowpath and the time it was failed in PEMS or on the manual inspection record
 - inform the client of the issue
 - note that the client is responsible for choice of treatment
 - record how and when the flowpath issue was rectified in PEMS or on the manual inspection record
 - inspect the flowpath as per above instructions
 - pass/fail the flowpath as per above instructions
 - advise the client that loading will not commence unless the flowpath has been passed
- If you identify an issue that will NOT be rectified whilst you are onsite you must
 - record failed flowpath and the time it was failed in PEMS or on the manual inspection record
 - inform the client of the issue
 - note that the client is responsible for choice of treatment
- Give client a **copy** of the completed PEMS or manual inspection record.
- Retain the **original** completed inspection record and any supporting documentation for a minimum of 2 years for auditing purposes.

Reinspect the flowpath

- The client must advise you when the flowpath issue has been rectified and is ready for reinspection.
- Conduct your inspection of the **entire flowpath** as described above.

Inspect empty container

If the empty container is present:

- You must ensure that the condition of the empty container has not changed since the container approval was issued by looking for
 - any structural damage that may allow cross-infestation of the goods
 - any pests, residues or contaminants that may infest or contaminate the goods.
- If the seal is intact you only need to check the outside of the container.
- Check the inspection sticker
 - to ensure the container is suitable to be loaded with consumable or non-consumable goods
 - is within 90 days of inspection
 - has not been removed or obliterated.
- If the condition has changed for any of the above reasons (and the issue cannot be rectified while you are present at the RE for the inspection) you must revoke the container approval by
 - for manual container approvals
 - recording the revocation of the container approval, including the time, date and reasons in the *comments* field of the inspection record
 - striking out the relevant container number line on the empty container inspection record and recording in the margin the time, date and reasons for the revocation
 - initialling the change to the empty container inspection record
 - taking a copy of the revoked empty container inspection record and providing a copy to the client and [Assessment and Client Contact Group](#)
 - for container approvals in PEMS
 - revoking the container approval in PEMS (see Reference: [Plant Export Management System authorised officer user guide](#))
 - adding relevant comments into the comments field in PEMS or on the manual inspection record for the goods inspection
 - notifying the client of the revocation of the container approval
 - remove and destroy any inspection sticker on the container.
- The empty container must have another container approval issued before the inspection of the goods can commence or another approved container must be provided to replace it.

Note: Only an AO with the ECI3001 job function can issue container approval.

Inspect bulk vessel

If the consignment is being loaded into a bulk vessel:

- Check the vessel approval status in PEMS or sight the manual bulk vessel inspection record to ensure that the vessel is suitable to be loaded with consumable or non-consumable goods and is within 28 days of inspection.
- Note all applicable holds that have been passed for loading.
- If the bulk vessel did not pass inspection or more than 28 days have passed since the date of inspection

- inform the client that the bulk vessel must be inspected and passed before the consignment can be inspected and loaded
- add relevant comments into the comments field of the inspection record
- withdraw the inspection

Note: Only an AO with the BVI3001 job function can issue bulk vessel approval.

Conduct goods inspection tasks

Assess the consignment

- Liaise with the client to
 - identify the lot/consignment to be inspected
 - confirm the goods presented comply with the information on the Notice of Intention/RFP
 - ensure the lot/consignment is accessible for sampling.
- Ensure all trade descriptions (if present) are accurate and unambiguous and meet requirements in the Guideline.
- If the goods information is **not** compliant with the Notice of Intention/RFP and/or the trade description requirements are **not** met
 - and the issue **will be rectified whilst you are onsite** you must
 - record failure issue in PEMS or on the manual inspection record
 - inform client of the issue
 - record how and when the issue was rectified in PEMS or on the manual inspection record
 - and the issue will NOT be rectified whilst you are onsite you must
 - record failure issue in PEMS or on the manual inspection record
 - inform client of the issue
 - give client a copy of the completed inspection record
 - retain the original completed manual inspection record and any supporting documentation for auditing purposes for 2 years.
- If the entire consignment is present
 - identify lots
 - determine the size of the lot/s
 - the maximum size of a lot must not be greater than 116 bales or not more than the amount which can be loaded into a 40-foot shipping container
 - record the number of bales forming each lot in PEMS or on the manual inspection record.

Inspect the consignment

Drawing of Samples

Presented goods can only be sampled and inspected **before** the loading of containers or vessels (or immediately prior to compaction in the case of cotton modules).

- For raw baled cotton and mote cotton, draw samples at the rate of
 - 6 bales per lot when bulk loaded into containers
 - 6 bales per lot when bulk loaded into vessels, unless otherwise stated in the approved bulk loading SOP.
- For mote cotton, draw one hand grab sample from each of the 6 sampled bales.

- For cotton modules / unprocessed cotton, draw 2 grab samples from each of 3 different modules per lot (6 grab samples in total per lot) – one from the centre of the module and one from the outside of the module (next to wrapping). Each grab sample must weigh at least 50g.
- Draw samples randomly from across the entire lot/consignment.

Inspecting Samples

- Inspect all samples using suitable equipment.
- Examine the samples for live pests, vermin and contaminants in accordance with the following tolerances
 - nil tolerance for live pest infestations unless specified otherwise by the Secretary
 - nil tolerance for vermin including rodents and their waste unless specified otherwise by the Secretary
 - tolerance levels for contaminants may be specified in the PEOM, by the importing country or by the Secretary.
- If there is any other contaminating material where no tolerance level is stipulated you
 - do not reject for these contaminants
 - must advise the client by recording in the comments section in PEMS or on the manual inspection record.

Raw baled cotton

- Inspect the exposed cotton surface of each bale
 - through tears in the hessian
 - by lifting the top flap of the bale
 - by making a 40 cm cut in the form of a right angle in the hessian.

Mote baled cotton

- Inspect the mote cotton surface of each bale.
- Inspect samples by breaking apart each grab sample to allow visual inspection of trash/cotton seed/cotton bol/leaf and other plant material, then rub the sample vigorously over a sieve and inspect contents of the pan.
- Walk around the bales in the lot to visually inspect for sources of contamination that may be present on the outside of the bales.

Cotton modules/unprocessed cotton

- Inspect samples by breaking apart each grab sample to allow visual inspection of trash/cotton seed/cotton bol/leaf and other plant material, then rub the sample vigorously over a sieve and inspect contents of the pan.
- Walk around all modules in the lot to visually inspect to verify nil soil or other contamination on the exterior of modules, paying particular attention to plastic wrap which has previously been in contact with the ground.

Pass the goods after inspection

- Pass the lot/consignment if you are satisfied that all relevant tolerance levels have been met and the consignment meets the phytosanitary requirements of the importing country.
- Record passed lot/consignment in PEMS or on the manual inspection record.
Note: For cotton being exported bulk into bulk vessels, you may not be required to submit your inspection record immediately. Refer to the SOP for instructions.
- Give client a **copy** of the completed inspection record.

- If the inspection was not recorded in PEMS, send the department a **copy** of completed inspection record and any supporting documentation.
- If the inspection was not recorded in PEMS, retain the **original** completed manual inspection record and any supporting documentation for auditing purposes for 2 years.
- You must ensure that the passed goods are segregated and clearly distinguished from goods which failed inspection or have not yet been inspected.

Reject the goods after inspection

- Reject the goods based on the relevant tolerances.
- Record rejection of lot/consignment in PEMS or on the manual inspection record.
Note: For cotton being exported bulk into bulk vessels, you may not be required to submit your inspection record immediately following the product inspection. Refer to the SOP for instructions.
- Inform the client of the rejection.
 - For live insect infestations you must order a treatment with an insecticide or fumigant by entering in the comments field of the inspection record.
 - You must not **recommend** any particular insecticide or fumigant as the choice of treatment is the responsibility of the client.
- Give client a **copy** of the completed inspection record.
- If the inspection was not recorded in PEMS, send the department a **copy** of completed inspection record and any supporting documentation.
- If the inspection was not recorded in PEMS, retain the **original** completed inspection record and any supporting documentation for auditing purposes for 2 years.
- You must ensure that the rejected goods are segregated and clearly distinguished from goods which have been passed inspection or have not yet been inspected.

Reinspect the resubmitted goods

Goods rejected for insect infestations

- Goods rejected for insect infestations must be treated with an insecticide or fumigant prior to reinspection.
- The client must provide satisfactory evidence that the treatment provider has completed the treatment in accordance with label requirements and that the goods are safe to reinspect.
- Before the reinspection commences you must check what supporting documents are required as per the Reference: [Plant export documents and treatments checklists](#).
 - If all the supporting documents have not been received you cannot continue with the reinspection.
 - Advise the client that they need to obtain the supporting documents before the consignment can be reinspected.
- Check that the supporting documents you have received are valid as per the Guideline: [Supporting documents for plant exports](#).
 - If any of the supporting documents are not valid you cannot continue with the reinspection.
 - Advise the client that they need to obtain valid supporting documents before the consignment can be reinspected.

Reinspection of the resubmitted goods

- Reinspect the resubmitted goods by following the above instructions for
 - conduct pre-inspection tasks

- conduct flowpath inspection tasks
- conduct goods inspection tasks
- pass the goods after inspection
- reject the goods after inspection.

Related material

The following related material is available on the department's website:

- [Manual of Importing Country Requirements \(Micor\)](#)
- [Plant Export Operations Manual \(PEOM\)](#)
 - Guideline: *Inspection of cotton for export*
 - Guideline: *Supporting documents for plant exports*
 - Work instruction: *Completing plant export inspection and treatment records*
 - Work Instruction: *Preparing a radioactivity statement certificate for plant exports.*
 - Work Instruction: *Preparing a declaration and certificate as to condition (EX188) for plant exports*
 - Reference: *Grain and plant product inspection record*
 - Reference: *Bulk into ships hold inspection record*
 - Reference: *Bulk vessel loading running record*
 - Reference: *Plant Export Management System Authorised Officer user guide*
 - Reference: *Plant exports guide – Equipment*
 - Reference: *Plant exports guide – Specimen collection*
 - Reference: *Completion of a Phytosanitary Certificate (E16) User Guide*
 - Reference: *Completion of a Certification as to Condition (EX46A) User Guide*
 - Reference: *Completion of a Phytosanitary Certificate for Re-Export (EX25) User Guide*

The following related material is available on the [Instructional Material Library](#) for departmental AOs:

- Work Instruction: *Invoicing plant export clients*
- Work health and safety.

Contact information

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

Document information

The following table contains administrative metadata.

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Version history

The following table details the published date and amendment details for this document.

Version	Date	Amendment details
1.0	28/03/2021	First publication of this work instruction.
2.0	27/05/2022	Updates to allow for loading into bulk vessels.
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.