

# Volume 14: Product Security (Horticulture)

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## Introduction

In your role as an authorised officer (AO) it is critical that you are aware of product security issues regarding the storage and movement of plant products intended for export.

By the end of this volume you will be able to understand the requirements:

- to store plant products in a secure manner
- to transport plant products in a secure manner
- the completion of transfer documentation.

It is important to remember that any breaches in product integrity or security may result in rejection of the commodity due to contamination during transport or product storage. If product security is breached at any stage, the AO will refuse to certify such product.

Following the rejection and/or treatment of an export plant product, or when ‘area freedom’ is claimed for a commodity, stringent procedures must be implemented to prevent cross-infestation and further contamination of other export products.

Stringent procedures protect the integrity of a commodity at a packing establishment and load out facility that will transfer a plant product. The receiving establishment must also maintain security of the produce until it is loaded for export.

## Product security roles and responsibilities

### Exporter/packer

- Responsible for preparation of transfer certificate
- Ensure requirements of this component of the Plant Export Operations Manual and Work Instruction are complied with.

### Regional technical manager

- Ensure that all AOs follow procedures in this Work Instruction.
- Approve arrangements for supervision of unloading product.
- Approve the use of physical barriers in tautliners and or pantechs.

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### Authorised officers

- AOs are responsible for monitoring the implementation of these procedures and signing of transfer certificates.
- Report non-conformities to the Area Technical Manager and Compliance & Investigation Unit.
- Send copies of transfer certificates to the Department of Agriculture and Water Resources (the department) office at destination.

### Regional departmental office

- Send copies of transfer certificates to the departmental office at destination.

### Related legislation

Related legislation and Work Instructions

- *Export Control (Plants and Plant Products) Orders 2011*
- Plant Exports Operations Manual
- Work Instruction WI#002 - *Sampling & Inspection for Export Certification of Completed Consignments and Lots – Fresh Fruit and Vegetables*
- Work Instruction WI#005: *Security and Transport of Horticultural Produce*

### Product security in storage

#### Physical barriers

Physical barriers such as walls or solid structures may be utilized to isolate product from untreated product or product of unknown status.

The primary consideration is that the barrier must be sound to prevent the movement of pests from a commodity of unknown status to the 'pest free' commodity. The risks associated with this will vary and will be related to the mobility of pests e.g. scale insects or larvae compared with crawlers or winged pests.

Physical barriers, where they form an entire barrier or form a secure unit to exclude the access of a pest, may be utilized to prevent re-infestation from other commodities or from the pest presence in the environment – e.g. use of a cold room or shipping container.

Shrink-wrapping of the packages and pallet is an option as a physical barrier. If using shrink-wrap, the base and the top of the pallet must be sealed (such as with a sheet of cardboard), as well as all sides to form total security of the treated product.

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Another option is the full enclosure of each pallet with mesh cloth with a maximum opening no larger than 1.6 mm diagonally including the surface area between the bottom row of cartons and the actual pallet and a “cap piece” lid.

Individual cartons can also provide a physical barrier. To achieve this, any opening within the carton must be screened with mesh or gauze with maximum openings not exceeding 1.6mm diagonally.

Care should be taken to ensure that when large volumes of secure product are deconsolidated and split into multiple lots, that the same physical barriers are re-applied to all lots to maintain security.

### **Distance (inside and outside cool rooms)**

Physical isolation is recommended at all times to maintain security and isolation of product from untreated product or product of unknown status. However, distance can be used in some circumstances to address cross contamination concerns between products and will vary depending on surroundings.

- Inside cool rooms (held at 5°C or below): Product may be held unsecured provided a minimum 0.5 metre separation is maintained. Product claiming ‘fruit fly area free status’ must never be held in an unsecure manner. Full package or pallet security must be maintained at all times. Note: the BQA SOM requires 1 metre separation.
- Outside cool rooms or cool rooms held above 5°C: Where product is held unsecured with untreated product or product of unknown status, a minimum 1 metre separation must be maintained.
- However, in this case, distance as a form of isolation can only be used where a quarantine pest is not endemic in the environment, otherwise full package or pallet security must be maintained. Product claiming ‘fruit fly area free status’ must never be held in an unsecure manner. Full package or pallet security must be maintained at all times.

### **Product security in-transit**

There are a number of options that exporters/packers may use when transporting goods that are subject to fruit fly area freedom, where treatments have been applied or after inspection.

Product should be moved in such a manner as to prevent cross-infestation/contamination. The following measures meet this requirement:

- Individual cartons holes screened carton must be screened with mesh or gauze with maximum openings not exceeding 1.6mm diagonally or

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- Shrink-wrapping of the packages and pallet is an option as a physical barrier. If using shrink-wrap, the base and the top of the pallet must be sealed (such as with a sheet of cardboard) or
- Full enclosure of each pallet with mesh cloth with a maximum opening no larger than 1.6 mm diagonally including the surface area between the bottom row of cartons and the actual pallet and a “cap piece” lid or
- Loading into a sealed shipping container with vent holes and openings secured with openings no larger than 1.6 mm (drain holes, air intakes etc), or
- Loading directly into pantech and or tautliner vans.

Where cartons and/or pallets are secured as above, the security measures will be monitored prior to inspection.

A breach of product security at this stage (such as torn shrink wrapping) will result in an AO’s refusal to certify.

### **Pantech and tautliners**

Where product is loaded directly into pantechs and tautliners and cartons and/or pallets have not been secured, the vehicles must be sealed and the seal numbers endorsed on a transfer certificate. The unloading must be supervised by an AO and the seal numbers verified.

The following conditions apply:

- If mixed loads are transported, cartons or pallets must be made secure (shrink-wrapped or meshed) or a physical barrier must be installed to separate and secure the goods in a section - if physical barriers are used, this must have prior approval of the departmental Regional Technical Manager.
- Only goods treated in the same way can be loaded into a sealed van unsecured.
- The goods should be unloaded at a single facility i.e. no stops along the way
- Arrangements must be in place for an approved officer to monitor the unloading of the goods on arrival.

### **Supervision of unloading of pantechs and tautliners**

The unloading of product from pantechs and tautliners (where the product has not been secured) must be supervised by an AO.

In certain circumstances the Regional Technical Manager may implement procedures for an establishment to unload produce in the absence of an AO.

Note. There are additional requirements to transferring plant products under the BQA SOM and Protocol Work Plans. An AO will be required to have a comprehensive knowledge of the security arrangements for the export of these commodities to these markets.

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## Use of transfer certificates

The transfer certificate is used in accordance with *The Export Control (Plants and Plant Products) Orders 2011* when consignments of horticulture produce are transported between registered export establishments and moved from one regional centre to another. They need not be used for movement within regional/metropolitan areas.

The use of the transfer certificate is to ensure that the receiving establishment has confidence that the product meets all phytosanitary requirements on departure from a registered establishment.

Subject to proper security measures during transport and at the receipt establishment, the product can be certified as meeting the importing country requirements. This matter is of critical importance when fruit fly host product is produced in an area free of fruit flies and is to be transported through potentially infested areas or is to be loaded for export in an area that does not have area freedom recognised by the importing country authority.

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A transfer certificate is to be used in the following specific instances:

- The goods originate from an area free of fruit fly or other pest or disease
- The goods are to be transported after treatment
- The goods are to be transported after an authorised officer's inspection
- Where a work plan requires export approval of grower orchard/blocks
- Where it is a specific importing country requirement e.g. citrus to Korea.

Copies of transfer certificates must be sent from the originating regional departmental office to the departmental office in the region to where the goods are travelling.

## **Labels**

Where a work plan requires export approval of grower orchard/blocks, labelling applied at the time of packing may be used to ensure traceability.

Labels must include the following:

- Contain the relevant approved grower/packer number/s
- Conform to the importing country requirements
- Be affixed to every box
- Be affixed before product leaves the packhouse, or
- Be affixed infield where in-field packing occurs.

## **Authorised officer responsibilities**

Inspection AOs must record compliance with the labelling requirements on the Export Compliance Record by stating “compliant labelling applied” as well as list the grower numbers and the packhouse number listed on each box, in the comments field.

## **How to apply for a transfer certificate**

1. Use the transfer certificate template found in the PEOM under ‘Documentation – Forms’ and complete the relevant sections.
2. Ensure the following information is included in the ‘Restriction or Comments’ field, where applicable:
  - date picked for each grower/lot listed (only required for PFA products)
  - date packed for each grower/lot listed
  - EXDOC endorsement number
  - other conditions to be met as an importing country requirement or as per a work plan (e.g. grower numbers, packhouse number)
  - method of security
  - details of treatments performed or pending
  - exporter name or RFP number if available (for invoicing purposes).

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3. Once complete send it to the National Documentation Hub (plantexportsndh@agriculture.gov.au) requesting issuance of the certificate prior to the transport of product.
4. Ensure supporting documentation is provided where applicable (area freedom certification, treatment declarations, etc.)
5. The email subject line must include the following information: TRANSFER CERTIFICATE; Date of transfer
6. Requests for transfer certificates require a minimum of 1 business day for processing from date of receipt. Requests for documentation services required outside of business hours must be made in advance and applicable overtime charges will apply.

Note: Transfer certificates must be made available to the AO at the time of inspection. They may not be issued once product has been moved.

### **Notification requirements for transfer of export produce**

When goods are moving with a transfer certificate, the following procedures must be followed:

- The local departmental office is to be notified in advance of the move of goods.
- The company must send a copy of the RFP and the transfer certificate to the local departmental office and the receiving departmental office.
- A copy of the transfer certificate must accompany the consignment.

The department reserves the right to supervise the unloading of the produce at its destination and verify seal numbers and other details on the transfer certificate.

### **More information**

- *Export Control (Plants and Plant Products) Orders 2011*
- *Export Control (Prescribed Goods – General) Orders 2005*
- Australia - New Zealand Bilateral Quarantine Arrangement – Systems Operation Manual
- Citrus Work plans for China, Korea, Thailand, Japan and USA
- Australian Fruit Exports Work plan for Taiwan
- Mango Work plans for China, Japan and Korea
- Cherry Work plans for Japan and Korea
- Apple Work plans for Japan and China

The Work Instruction *Security and Transport of Horticultural Produce* should be read in conjunction with the New Zealand BQA Systems Operation Manual (SOM) and

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relevant Work plans which might require additional security precautions and outline arrangements to meet importing country requirements.

Approved security measures are also outlined in this instruction. These procedures apply to the storage and/or transport of fresh fruit and vegetables that are intended for export from one export registered establishment to another.

The Work Instruction also outlines the transfer certificate that must accompany any goods that are to be transported.

## Relevant eLearning modules

- Export Inspections: Commodity Inspection – Horticulture
- Export Auditing: Horticulture

## Questions

- You can contact your Regional Plant Exports Program Manager to clarify any aspects of this volume in the first instance.
- You can also direct a specific question or provide feedback to [plantexporttraining@agriculture.gov.au](mailto:plantexporttraining@agriculture.gov.au)

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