Importing bulk grain for stockfeed and milling – an overview

26 August 2019

The Department of Agriculture (department) has a major role in regulating imports of bulk grain through granting import permits, which provide commercial supply options for grain users and suppliers in response to drought.

The decision to import grain is a commercial decision by the importer.

Our responsibility is to ensure that any imports do not compromise Australia’s biosecurity status.

Managing biosecurity risks

The Department, in partnership with industry, is responsible for managing Australia’s biosecurity, which means minimising the risks associated with imported goods that could impact our industries, trade, environment and way of life. We do this by regulating the importation of goods into Australia through our legal powers under the Biosecurity Act 2015 (the Act).

In managing biosecurity, our focus is on minimising risk rather than applying a zero risk policy. This approach ensures we are balancing the need to protect Australia from exotic pests and diseases, while maintaining our ability to trade internationally.

Current situation

A large proportion of grain growing areas in eastern Australia are currently experiencing drought, which is impacting a number of our grain, livestock and processing industries. It was anticipated that certain classes of grain would be in short supply from mid-2019.

Some grain users have therefore sought to import bulk grain for processing into stockfeed and milling products, to ensure a continuous and steady supply of grain for the domestic and export markets.

Intensive livestock producers rely on steady supplies of known product, as abrupt changes in diet can lead to production losses and animal deaths. Without a continuous supply of particular products, such as high protein grain, the milling industry is at risk of production losses, increased production costs, loss of trade and market access, and loss of consumer confidence in Australian products.

Historically, Australian companies have sought to import bulk grain for a range of commercial reasons, including supplementing short supplies of domestic grain during drought periods. The last time bulk grain was imported (canola from Canada, soybean from Brazil and sunflower from Argentina) was in 2007.
Imported grain poses a high potential biosecurity risk and we have strict arrangements in place to ensure it can be imported safely.

In considering the current requests to import grain, we must be satisfied that any biosecurity risks can be managed before deciding to issue a permit.

**Risks of importing bulk grain**

Imported bulk grain poses a high biosecurity risk because it can provide a direct pathway for the introduction and spread of exotic pests and diseases that can harm humans, animals, crops and the environment.

**Plant biosecurity**

Plant pests (including weeds and stored grain pests) and pathogens (which cause disease) that can be introduced with imported grain can damage our environment and destroy our food production and agriculture industries.

Some of the most significant [plant pests] that can enter Australia with bulk grain are the Khapra beetle and Karnal bunt. Considered national priority plant pests and among the top 40 unwanted plant pests for Australia, we are committed to keeping these unwanted pests out.

**Animal biosecurity**

Animal diseases that can be introduced with imported grain are a major threat to Australia's livestock and poultry industries and an outbreak would likely impact our access to export markets and undermine livelihoods.

The potential for grain to be contaminated with a pathogen of animal biosecurity concern to Australia varies depending on the type of crop, the country of origin, the type and scale of production, and the methods for harvesting, storing and transporting.

The national priority [animal diseases] we are committed to preventing from entering Australia through bulk grain include foot-and-mouth disease, porcine epidemic diarrhoea, Newcastle disease and avian influenza to name a few.

We are also committed to preventing any other plant and animal pests and diseases, including weeds, of biosecurity concern entering Australia through imported bulk grain.

Australia is a major producer and exporter of grain and animal products. If an incursion or outbreak of any of these plant or animal pests and diseases occurs it would have a major economic impact on our agriculture and livestock industries. Therefore any consideration to allow grain to be imported requires rigorous assessment and the application of stringent measures to manage plant and animal biosecurity risks to a level that provides an appropriate level of protection for Australia.

**Import protocols for bulk grain**

For over 20 years, during the periods when imports were occurring, we managed the biosecurity risks associated with imported grains under the protocols that were established.
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during the drought of 1994-95. We updated the protocols in 2018 to ensure the associated risks would continue to be managed in accordance with our current requirements under the Act. As such, for imported grain:

- a permit **must** be approved before grain is imported to Australia
- grain **must** be sourced from a country with a low plant and animal health risk status
- the export pathway for grain (i.e. grain elevators and transport units) **must** be clean, from the farm to the point of loading on to the vessel
- the grain **must** be of a particular grade or class with low levels of foreign material including weed seeds and soil
- the grain **must** be free from animal material, and plant pests and diseases that are of biosecurity concern to Australia prior to export
- the grain **must** be transported securely when onshore (in Australia) to control leakage of grain or dust during transport from the point of discharge to the point of processing
- the grain **must** be stored and processed under biosecurity control at a facility that we authorise as an approved arrangement
- the grain **must** be processed using a department-approved method to mitigate plant and animal biosecurity risks
- the department **must** be satisfied that the proposed importation meets all these requirements otherwise a permit will not be issued.

Managing risks associated with importing bulk grain

Applications to import grain are considered on a case-by-case basis and require thorough risk assessment and site and desk audits of the proposed import pathway.

We will assess all biosecurity risks and verify the permit applicant’s proposed systems and processes within the source country and Australia. We must be satisfied that the risks can be managed to an acceptable level. If we find any biosecurity concerns, we will not allow the grain to be imported into Australia.

Pathway risk analysis

For each request we receive to import grain, we will undertake a pathway risk analysis for the proposed source country (e.g. wheat from Canada).

A pathway risk analysis involves looking at the scientific and economic evidence for a potential pest, weed or pathogen species of biosecurity concern to Australia, its regulation, and the management actions we would impose to reduce the risk of its entry and spread within Australia.

We will also verify the presence or absence of pests of biosecurity concern, pest control practices, and the systems in place for the production, harvesting, storing, transporting and processing of grain destined for export.

If we are not satisfied that the management strategies applied can reduce the biosecurity risks to an acceptable level, we will not allow bulk grains to be imported into Australia.
View our reports of completed analyses for importing bulk grain from various countries.

**Desktop and on-site audits**

We also undertake audits of the systems and processes within Australia to verify that the biosecurity risks associated with imported grain can be managed onshore. This is done through both a desktop and onsite audit.

Our desktop audit involves checking the importer’s proposed Process Management System supplied at application to verify that the systems and processes in place at each key control point on the entire import pathway — the sourcing, moving and loading grain in the source country, as well as the movement, storage and processing of imported grain within Australia — manage the biosecurity risks to acceptable levels.

**In the source country**

- Grains must be sourced from areas with a low plant and animal risk status with respect to pests and diseases of biosecurity concern to Australia.
- The export pathway, from the farm to the point of loading, ensures that the grain is sourced from and transported within the identified low risk areas.
- Storage and transport units used along the export pathway must be thoroughly cleaned prior to use to prevent contamination with imported and/or local whole grain, stockfeed or stockfeed ingredients, insect pests, and other infestible residues, soil, animal or avian remains, faeces or any other extraneous contamination.
  - We require third party inspection certification or recognition of industry quality management systems that manage contamination risks as assurance of cleanliness.
- Grain must be inspected and certified as free from pests of biosecurity concern, by the National Plant Protection Organisation of the source country.
- Grain must be graded and certified by the source country’s quality standards body at the point of export to ensure minimal levels of foreign material within the consignment such as weed seeds, soil, and animal material.

**In Australia**

- Grain must be transported in clean conveyances and conveyances must be sufficiently secure to control the leakage of grain or dust during transport from the point of discharge through to the point of processing. For example, approved sealed containers or roll-over tarp trucks (that tightly seal thereby limit the loss of grain).
- Grain must be transported along approved routes that we have assessed, and will be tracked from the point of arrival to final release from biosecurity control. All grain movements must be reported to us and grain weight reconciliations undertaken.
- Imported grain must be stored and processed while subject to biosecurity control in a facility covered by an approved arrangement (approved arrangement site). Storage and processing of imported grain must also be managed in accordance with the approved arrangement, including to contain spills and manage associated biosecurity concerns.
- A Site Operations Manual, that we must approve, must be in place for the approved arrangement site and which outlines the processes for managing the grain within the...
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confines of the approved arrangement site. Approval of the site is only given if our requirements are met.

- The assessment of the approved arrangement site and the transport route considers a range of factors relevant to the management of biosecurity risk including proximity to agricultural production, potential animal and plant hosts and transport routes (especially passage through agricultural areas).

- Processing and treatment of imported grain must be undertaken with specific time and core temperature requirements to further reduce the biosecurity risks before release from biosecurity control. The time and temperature requirements are specific to processed products directed for human or animal consumption.

- Associated waste must be disposed of according to our requirements and in accordance with an approved arrangement, such as deep burial, high temperature incineration or autoclave.

- Emergency action plans must be in place to manage spillage or any other possible incidents on the import pathway.

- Imported grain must not be diverted to any location or used for any other purpose than that stated on the import permit.

- When the import process has been completed, the storage and processing facilities must undertake comprehensive decommissioning processes, which we must approve, prior to re-commencing normal operations.

As part of the site audit we require that the proposed key control points for managing biosecurity risk are demonstrated and assessed using domestic grain.

Issuing an import permit

We will decide to issue or refuse to issue a permit to import grain to Australia based on the outcomes of our risk analyses and audits.

Any permits we issue set out the requirements for managing the risks across the entire pathway, from the overseas farm to the processing facility in Australia. These requirements are called permit conditions. They are legally enforceable and the importer is responsible for meeting these conditions.

If we find that an importer has not complied with one or more of these conditions we will suspend or revoke the import permit. This could mean re-export of the shipment of grain. We may also refuse to issue another permit to an importer if corrective action has not been taken to address the non-compliance.

We may also suspend or revoke an approved arrangement (e.g. a storage or processing facility) if it is found to not comply with the conditions we have set for the approved arrangement. This may impact an importer’s ability to import grain in to Australia.

Managing the grains pre-export

The importer is responsible for managing the risks associated with the sourcing, handling and transport and shipment of the grains from the farm to the point of loading in the source country according to the conditions of the permit. They must provide us relevant certification from the exporting country’s government as evidence they have met these conditions.
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Managing the grains in Australia

The importer is responsible for managing the biosecurity risks upon the grain's arrival in Australia according to the conditions of the permit and their Process Management System document approved by the department.

We will verify that the importer is meeting the requirements of the import permit – from the point of arrival in Australia to release of the processed grains. We may intervene at any time to stop activity or require it to be done differently. We can also suspend, vary or cancel the permit at any time.

Prior to discharge of the grain from the ship, we will undertake an inspection to verify freedom from pests and diseases. We also undertake verification inspections:

- during discharge at each port
- on completion of discharge at each port
- during receival and outloading from each approved arrangement site
- following decontamination or decommissioning at each approved arrangement site.

More information

Learn more about importing bulk grain to Australia.
Email the Imports team or call 1800 900 090.