



**Australian Government**  
**Department of Agriculture**

# Imported Inorganic Containerised Fertiliser

## Assessment and Management Policy

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## Purpose

The 'Imported Inorganic Containerised Fertiliser Assessment and Management Policy' (the Policy) has been produced by the Department of Agriculture in consultation with the fertiliser industry, through its representative body, Fertilizer Australia Inc (Fertilizer Australia). The Policy sets out the agreed procedures, quality assurance processes, standards and qualifications to be applied to containerised mined and chemical fertiliser imported into Australia. The document also outlines the process for determining the levels of classification for these imports and the assessment and management regime that will apply to each fertiliser import risk classification level.

The Policy applies to containerised fertiliser, including bulk, in bags greater than 100 kg, and small bags of 100 kg or less that are not packed at the place of production.

## Definitions

The following definitions apply to this policy. Definitions apply when used in both single and plural. Where terms are not defined, the definitions that apply under the [Biosecurity Act 2015](#) prevail.

Term	Definition
<b>Biosecurity risk material</b>	Includes, but is not limited to: <ul style="list-style-type: none"> <li>• animal material (such as hair, fur, skin, faeces, shell, blood and fluids, feathers, honey, flesh and bone);</li> <li>• live animals (such as rodents and reptiles);</li> <li>• food refuse (such as food scraps);</li> <li>• live insects (such as Khapra beetle);</li> <li>• snails (such as giant African snail);</li> <li>• plant pathogens (such as fungi, nematodes, bacteria, viruses etc.);</li> <li>• plant material (such as pollen, bark, spores, flowers, seeds, gum, leaves, branches, roots, stems, wood, fruits and vegetables); and</li> <li>• soil (such as dirt, mud, gravel, clay and sand).</li> </ul>
<b>Certified laboratory</b>	A laboratory that is independently approved and recognised as meeting the essential requirements of a quality management system, a scientific facility equipped to conduct tests and investigations.
<b>Department of Agriculture or the department</b>	The Commonwealth of Australia Federal Government department responsible for the administration of the functions under <i>Biosecurity Act 2015</i> , as may change from time to time. (Previously known as the Department of Agriculture and Water Resources, the Department of Agriculture, Fisheries and Forestry, or the Australian Quarantine Inspection Service).
<b>Department authorised auditor</b>	Auditors that are approved by the department to conduct a specific audit.  Note: these may be departmental staff and biosecurity

	officers; or <b>Independent third party auditors</b> .
<b>Guano</b>	Mineralised rock phosphate of marine bird excrement origin, or bat excrement for bat-guano.  <b>Note:</b> If the fertiliser contains non-mineralised guano; refer to the BICON commodity, 'Fertilisers, Animal or microbial derived ingredients- Terrestrial animal or avian.'
<b>Imported Inorganic Bulk Cargo Fertiliser Assessment and Management Policy</b>	The Department of Agriculture document that sets out the industry agreed policy for import of inorganic fertiliser bulk in-ship, as may be updated from time to time.
<b>Independent third party auditor</b>	Auditors independently accredited and registered with an international auditing body, or is determined by the department as having equivalent accreditation.
<b>Inorganic, or Mined and chemical fertiliser</b>	Manufactured chemical fertilisers, and mined raw materials used in the making of fertilisers, which do not contain organic, plant, animal or microbial materials. These include soil conditioners, or supplements used to promote growth in soil.
<b>Large bags</b>	Bags used in the packaging and transport of fertiliser that accommodate more than 100 kilograms of product.
<b>Manufacturer</b>	A company that manufactured/produced the goods intended for import into Australian territory.
<b>Small bags</b>	Bags used in the packaging and transport of fertiliser that accommodate 100 kilograms or less of product.
<b>Sponsor</b>	An Australian based and registered company, who will provide the first point of contact for the department within Australia
<b>Supply chain</b>	The manufacturing process, handling, transport, bagging, storage and container inspection and loading facilities and procedures, and sampling procedures that were utilised in the preparation of the goods prior to export to Australian territory.

## Introduction

The importation of fertilisers into Australia can present a serious biosecurity risk if not managed appropriately. Given the high potential for direct application of fertiliser to soil, the department has maintained a zero tolerance policy on fertiliser contamination since 1995.

Imported consignments of inorganic fertiliser may be contaminated with seeds, soil, and other plant or animal material, which could introduce harmful exotic pests and diseases into Australia. Contamination can occur at a number of points throughout the supply chain; from manufacturer, transport logistics through to container loading and including the container that takes the product to Australia. Recognising this, critical control points through the supply chain have been identified and related contamination management strategies were put in place.

There is also a legislative requirement for most importers to have met certain conditions to import fertiliser into Australia. These conditions are given effect under the *Biosecurity Act 2015*, as set out under Section 40 of the [Biosecurity \(Prohibited and Conditionally Non-Prohibited Goods\) Determination 2016](#).

The department employs a range of strategies to effectively manage the biosecurity risk through collaboration with industry across the supply chain. However, it is acknowledged that the same level of intervention is not appropriate in all circumstances. To allow for this differentiation, the policy reflects a three tier approach aligned with the contamination management strategies employed by manufacturers and/or importers. The three tiers are as follows:

- **Level 3 – High Risk**
- **Level 2 – Medium Risk**
- **Level 1 – Low Risk**

The three levels of classification are applied per consignment and are based on consideration of the supply chain to the point of container loading. The underlying principles include:

- alignment of classification and associated biosecurity management procedures with critical control points and appropriate level of protection (ALOP) from biosecurity risk;
- an open and transparent decision making model; and
- consistent implementation of efficient and effective procedures for dealing with any biosecurity contamination of containerised fertiliser.

In instances where there are no audited contamination management strategies in place, consignments are classified as Level 3, high risk. Where some strategies have been implemented and audited, consignments are classified as Level 2, medium risk. Where the full suite of strategies has been implemented and there is a high level of confidence in the biosecurity integrity of the consignment, it is classified as Level 1, or low risk.

As per departmental standard procedures for containers imported into Australia, a container cleanliness declaration and packing declaration are mandatory for all consignments.

## Background to the Policy

The policies described in this document are the result of a cooperative project between the department and the Australian fertiliser industry through its representative body, Fertilizer Australia. This cooperative approach has enabled the development of a Policy that improves the effectiveness and efficiency of the various parties involved in importing fertilisers that are vital to Australian agriculture.

This Policy was developed and introduced in 2006. It was reviewed in 2013 and 2017 in response to a high level of industry compliance with biosecurity import conditions and to improve auditing processes.

From a biosecurity perspective, this Policy not only provides confidence in the integrity of biosecurity controls at the border, but also encourages industry compliance.

From an industry perspective, the Policy ensures a clear understanding of biosecurity assessment and management procedures. It also provides opportunities for companies to reduce the commercial risk of importing fertilisers by implementing supply chain procedures and quality assurance that significantly reduce the risk of contamination.

In the development of this Policy, the department has maintained its zero tolerance policy on fertiliser contamination. Further, the Policy provides a high level of integrity and transparency in the biosecurity decision-making system. The Policy also allows importers to take extra measures to reduce commercial risk and capture the maximum benefit.

The department may update this document from time to time. Prior to making amendments to this Policy, to ensure relevance for the fertiliser industry, the department may continue to engage with industry stakeholders, including Fertilizer Australia for consultation.



## Assessment and Management Policy

Each of the three levels of classification for imported containerised fertiliser has a corresponding biosecurity intervention, reflecting the level of quality assurance and biosecurity risk management applied to the supply chain to reduce contamination risk. The assessment is applied based on consideration of the supply chain to the point of container loading for each consignment.

Bulk vessel supply chains currently categorised as Level 1 under the 'Imported Inorganic Bulk Cargo Fertiliser Assessment and Management Policy' will be assessed on a case by case basis when making an application for audit under this Policy. The applicant will need to submit documentation in relation to quality assurance procedures for the container inspection and loading components of the supply chain.

The consequence of a Level 3 rating is a high level of department intervention at the border. The consequence of a Level 2 rating is reduced department intervention at the border. The consequence of a Level 1 classification is the consignments do not require departmental inspection on arrival, however, they are subject to random inspections to verify compliance.

Refer to [BICON](#) for details of assessment and management requirements on arrival for each risk level.

### LEVEL 3 – High Risk Consignment

For a consignment to be classified as Level 3, one or more of the components within the supply chain, such as the manufacturing process, handling, transport, bagging, storage and container inspection through to loading facilities and procedures, do not meet sufficient evidence of contamination control.

### LEVEL 2 – Medium Risk Consignment

For a consignment to be classified as Level 2, all of the components within the supply chain, including the manufacturing process and container inspection procedures must have provided the department with acceptable evidence of biosecurity contamination control as detailed below.

Importers seeking consideration for reduced department intervention at the Level 2 classification must [apply to the department](#) to undergo [desk](#) and an [onsite audit](#). If supported, the manufacturer and supply chain will be classified as Level 2, specific to the country of origin, manufacturer, supply chain, and product. Multiple importers from the same supply chain can utilise the initial supply chain Level 2 classification provided the subsequent importer(s) meet the Level 2 documentary requirements.

Prior to the initial application, the importer must demonstrate that onshore and offshore biosecurity risk management systems are in place. A full departmental desk audit of these biosecurity risk management systems is undertaken by the department, followed by a physical audit of the supply chain conducted by an independent third party auditor.

The importer must also be able to provide evidence that:

- a minimum of 3 consecutive consignments with a total of 50 or more containers from the nominated supply chain have been imported into Australia in line with the

Level 2 requirements (i.e. including full Container Inspection Reports)

- these consignments have had a full unpack and inspection by a biosecurity officer
- no biosecurity risk contamination was identified by the biosecurity officer
- the offshore biosecurity risk management system documentation presented must be in accordance with the Level 2 requirements specified in the sections below.

## Desk Audit

Manufacturers wishing to be considered as part of the Level 2 category must apply in writing to the department, and nominate a sponsor. Applications will be subject to a desk audit and assessed on their individual merits with consideration given to the apparent level of biosecurity risk.

The purpose of the desk audit is to confirm that processes within the supply chain are sufficient to mitigate the biosecurity risk material that may be present within the product, in particular managing contamination. The process of approval incorporates the following principles:

- appropriate level of rigor in the assessment process;
- equity between the assessment of different applicants; and
- transparency in the process.

Applications must be supported by an Australian based and registered company, who will provide the first point of contact for the department within Australia.

The minimum requirements for an application are outlined at [Attachment 1: Initial Desk Audit](#).

The desk audit is processed by the department within 6 weeks from receipt of the application. The outcomes of the desk audit will be provided to the applicant on completion of the desk audit process.

## Onsite Audit

An initial onsite audit of the supply chain procedures and facilities is undertaken after the completion of the desk audit. The department will only progress with an initial onsite audit after the documentary evidence has been assessed and the department concludes that the supply chain processes have capacity to mitigate the biosecurity risk. It is the importer's responsibility to ensure that the nominated supply chain is capable of operating within relevant departmental requirements. The initial physical onsite audit of the supply chain procedures and facilities can be conducted by an independent third party auditor. The purpose of this physical audit is to confirm that the supply chain procedures can ensure the biosecurity integrity of the product throughout the supply chain process.

An onsite audit report must be included in the desk audit submission when forwarded to the Audit Services for consideration.

To maintain a Level 2 status, an onsite audit must be undertaken by an independent third party auditor every year.

The minimum requirements for an application are outlined at [Attachment 2: Onsite Audits](#).

## Manufacturer Declaration

For a consignment to be classified as Level 2, it must be accompanied by a Manufacturer's Declaration. An individual declaration must be made for every consignment, must accompany each shipment of imported fertiliser and must be presented along with other documents to allow for assessment of the risk status of the goods. The purpose of the Manufacturer's Declaration is to demonstrate to the department that the manufacturing processes have not changed since the latest audit in a way that would impact on the biosecurity integrity of the goods being imported.

All documentation presented to the department as part of the import process must meet the [Documentary requirements for clearance](#).

The declaration must state that:

1. the fertiliser is mined or chemical, that no organic animal, plant or microbial constituents are used in the manufacture of the fertiliser;
2. the containers have been inspected and no biosecurity risk material including infestation exists;
3. if the goods are bagged, that all bags used are clean and new.

All declarations must:

- be on letter head of the supply company, under the same name and identifying information as per the latest audit documents;
- be legible and in English;
- be dated;
- specify consignment details including name of products and tonnage loaded;
- detail the container numbers;
- detail the bill(s) of lading number(s);
- specify the location the containers were loaded;
- verify that there have been no alterations to the premises, associated machinery, manufacturing process and supply chain that would increase the likelihood of entry of animal, plant, soil material or their by-products into the consignment.

A sample 'Manufacturer's Declaration' is at [Attachment 3: Template for Manufacturer's Declaration](#).

Details of the requirements for a Level 2 consignment are:

- manufacturer supply chain has been audited by a third party (annually);
- manufacturer's declaration provided for each consignment;
- container inspection reports must be completed and retained for auditing purposes.

## Container Cleanliness Declaration

The department must be provided with documentation demonstrating that the containers are free of contamination. Full Container Inspection and Treatment Reports must be completed and retained for auditing purposes.

Guidelines for the inspection and certification of containers are included in the [Fertilizer Australia Container Inspection Procedure](#) located on Fertiliser Australia's website.

Empty Container Inspection and Record template can be found at [Attachment 4: Template](#)

### [for Container Inspection Record.](#)

All container cleanliness declarations must meet the [Documentary requirements for clearance](#) and declaration requirements set out for [Manufacturer's declarations](#) in the section above.

## LEVEL 1 – Low Risk Consignment

For a consignment to be classified as a Level 1, a number of contamination management strategies must be in place across the supply chain from the point of manufacture through to and including the container inspection, certification and loading.

The contamination management strategies set out in this policy for Level 1 risk classification are recognised by the department as best practice principles that provide high level confidence in the biosecurity integrity of the consignment. Details of the requirements for a Level 1 consignment are provided below.

Details of the requirements for a Level 1 consignment are:

- All requirements of a Level 2 consignment must be met;
- Each consignment must be accompanied by a Manufacturer's Declaration;
- Each consignment must be accompanied by a 'Sampling Declaration', which can be issued as part of the manufacturers declaration (refer to Attachment 3: Template for Manufacturer's Declaration);
- the supply chain has been audited by a third party annually;
- the supply chain audit has been performed by a departmental biosecurity officer, or a new department authorised auditor every third year;
- container inspection reports must be completed and retained for auditing purposes.

### Desk Audit

Importers and manufacturers seeking consideration for further reduced intervention can seek a Level 1 classification from the department. Applications will be subject to an initial desk audit and assessed in accordance with the process outlined at [Attachment 1: Initial Desk Audit](#).

The importer must be able to provide evidence that a minimum of 3 consecutive consignments (with a total of 50 or more containers) complying with Level 2 conditions have been imported with no biosecurity risk material, contamination or infestation.

In addition, following the sampling inspection procedures specified in [Attachment 5: Department of Agriculture Sampling Standard for Containerised Fertiliser](#), the applicant must provide complete sampling documentation for the goods being imported.

### Onsite Audits

An initial onsite audit of the supply chain procedures and facilities is undertaken after the completion of the desk audit. The department will only progress with an initial onsite audit after the documentary evidence has been assessed and the department concludes that the supply chain processes have capacity to mitigate the biosecurity risk. The purpose of the initial onsite audit of the procedures and facilities is to confirm that the supply chain processes can ensure the biosecurity integrity of the product. The initial onsite audit will be undertaken by a biosecurity officer.

Where desk audit requirements have been met and the department chooses to proceed with an onsite audit, the site audit will be scheduled within a six-month timeframe of the conclusion of the desk audit. Where there are extenuating circumstances this timeframe may require to be extended, and a new timeframe will be agreed between the department and applicant.

If supported by the department, the manufacturer and supply chain will be classified as Level 1, specific to the country of origin, manufacturer, supply chain, and product. Multiple importers from the same supply chain may utilise the initial supply chain Level 1 classification provided the subsequent importer(s) meet the Level 1 documentary requirements.

To maintain a Level 1 status, an onsite audit must be undertaken annually by an independent third party auditor. Every third year a new department authorised auditor must be utilised for a supply chain audit.

Independent third party auditors must be independently accredited and registered with an International Auditing body.

The on-site audit process is detailed in [Attachment 2: Onsite Audit](#). They are scheduled at a time convenient to both the department and the applicant.

Audits should not be conducted any later than five months after the time intended under this Policy, unless there are extenuating circumstances outside of the control of the applicant and an extension is agreed by the department.

### Manufacturer Declaration

For a consignment to be classified as Level 1, it must be accompanied by a Manufacturer's Declaration. An individual manufacturer's declaration must be made for every consignment, must accompany each shipment of imported fertiliser and must be presented along with other documents to allow for assessment of the risk status of the goods. All requirements for a Manufacturer's Declaration for [Level 2](#) must also be met for all Level 1 consignments. A sample declaration is at [Attachment 3: Template for Manufacturer's Declaration](#).

The Manufacturer's Declaration must confirm that samples were taken in line with approved methods and certify that there was no biosecurity risk material contamination identified in the sample.

The offshore risk management systems documentation presented must be in accordance with Level 1 requirements specified below.

### Container Cleanliness

For a consignment to be classified as Level 1, all containers must have been inspected as in accordance with the process as outlined for [Level 2](#). All full Container Inspection Reports must be completed and retained for auditing purposes. [Attachment 4: Template for Container Inspection Record](#).

### Sampling

Level 1 consignments require samples to be drawn for analysis of biosecurity contamination. Sampling and inspection must be undertaken during loading for each individual container or

bag in accordance with accepted procedures, which are agreed upon and instigated at the initial onsite audit. Samples are required to be inspected immediately after being drawn to allow for rejection if required in accordance with [Attachment 5: Department of Agriculture Sampling Standard for Containerised Fertiliser](#) .

### Level 1 Gold supply chains

For Level 1 supply chains that are considered by the department to be very low risk due to a long-term history of compliance, a status of Level 1 Gold may apply.

To be eligible for Gold status, Level 1 must have already been achieved by the supplier, and already be considered low-risk by the department. However, before the supply-chain can be considered for Gold status the following application requirements must be met:

- show capability to meet biosecurity requirements in at least two audits conducted by department authorised auditors; and
- meet all Level 1 requirements for annual supply chain audits; and
- complete at least 10 consignments over a five year period; and
- have zero detections of biosecurity risk within those consignments.

Supply chains that meet these initial criteria will need to go through an application process and be reviewed by the department prior to classification as a Level 1 Gold supply chain. This review will seek to ensure that these facilities have had no recent, or ongoing issues in relation to the management of their current supply chain. Such issues would not be limited to actual identified biosecurity risk, but may include concerns around documentation or audit and verification requirements.

The auditing regime for Level 1 Gold status supply chains allows for the departmental audit schedule to reduce to an audit every six years by a department authorised auditor. This audit cycle will remain in place unless there are significant changes to processes, procedures, the physical structure, or management structure of the supply chain. The auditing requirements may also be amended by the department in the event of contamination being detected in imported product.

A containerised pathway will be considered for Gold status on the basis of 10 consignments of inorganic fertiliser. For the purpose of assessing a container pathway a consignment will constitute at least 4 FCL of fertiliser across multiple vessels, or a single bill of lading that includes more than 4 FCL on a single container vessel, whichever is greater.

## Contamination Management Procedures

The department maintains the zero tolerance policy on fertiliser contamination in the application of this import policy. However, the department also recognises that minor spot contamination that is not widespread throughout a consignment, may pose a sufficiently low risk to be addressed following arrival onshore.

The department may choose to assess and manage a consignment of fertiliser onshore following arrival within Australian territory, and this decision will be made by the relevant biosecurity officer or the Director of Biosecurity (or delegate). Such a decision will be made on a case by case basis.

The biosecurity officer, or the Director of Biosecurity (or delegate) may take into account whether:

- the contamination can be easily contained;
- the contamination is not widespread;
- the contamination can be easily managed;
- any applicable management can be applied within the confines of the relevant port facilities;
- volume of consignment and size limitations of approved management options.

The department may choose to review and amend the level of risk posed by the consignment or the supply chain as a result of contamination to a Level 3 status until the department is satisfied that the reason for contamination has been identified and corrective actions implemented. The approval for treatment rests with the department.

- Any infestation detected must be dealt with first, prior to dealing with contaminant issues.
- If contaminants can be removed, all contaminants are to be destroyed through an approved method at an Approved Arrangement site in a metropolitan area.
- If none of the treatment options are acceptable or suitable, the department may consider a proposal to reprocess the product, or a proposed alternative end use for the product on a case by case basis.
- If there are no acceptable or suitable treatment options and the product cannot be re-processed or given an alternative end use, the consignment is to be exported or destroyed through an approved method at an Approved Arrangement site in a metropolitan area.
- Contamination treatment procedures may be subject to department supervision and/or re-inspection of the goods.

## Biosecurity risk treatment guide

The Biosecurity risk treatment guide provides advice to users about department approved treatments that address biosecurity risks detected as contaminants on imported commodities.

The following decision tree provides advice for the management of contamination.

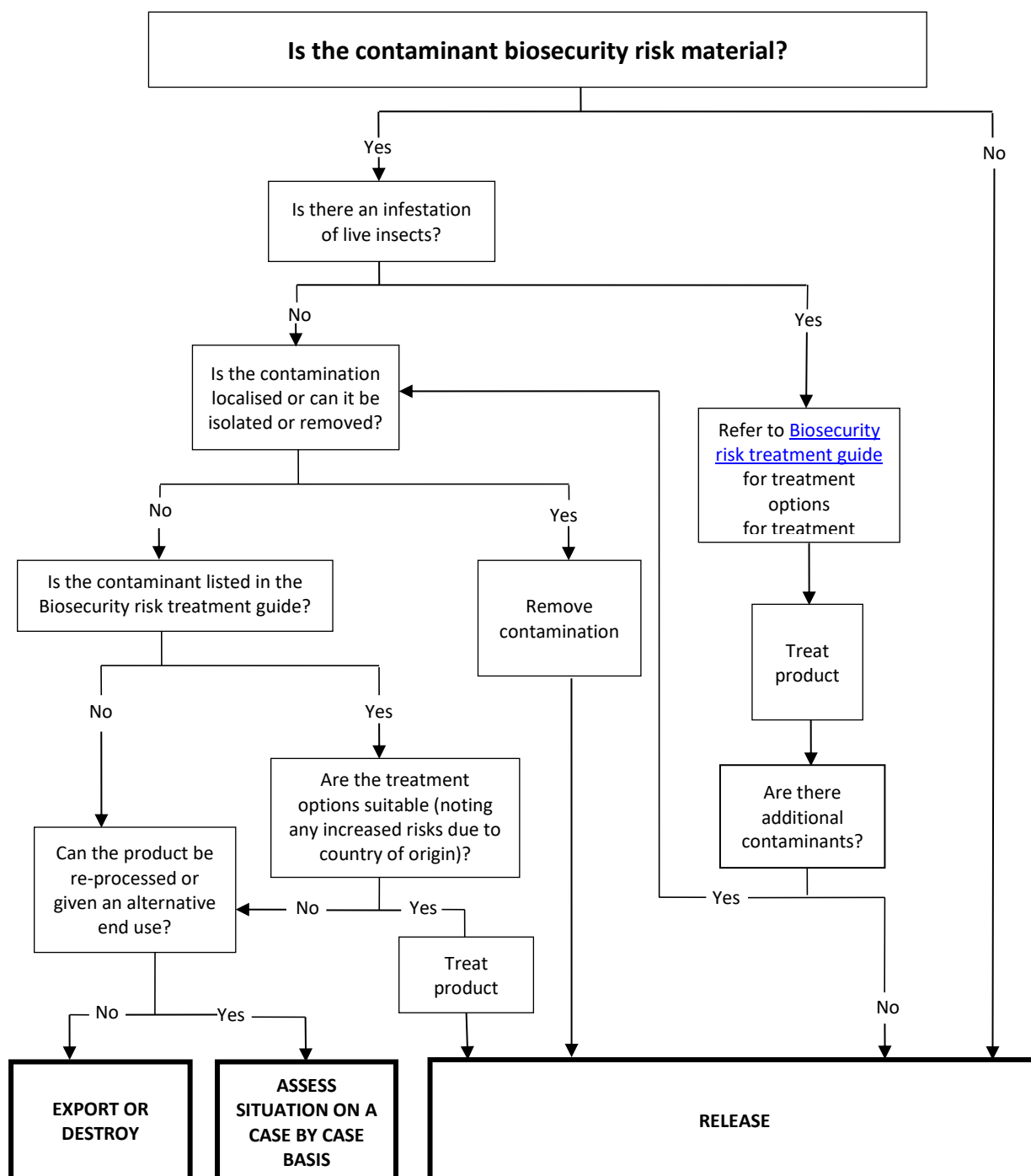


Figure 1 - decision tree for management of biosecurity risk material



## Attachment 1: Initial Desk Audit

### Background

Manufacturers and supply chains wishing to be recognised as part of the Level 1 or 2 categories must apply in writing to the department and apply for a desk audit. The purpose of the desk audit is to confirm that the manufacturing processes, transport operations, storage facilities, container cleanliness and loading, and sampling procedures, can mitigate the biosecurity risk.

Bulk vessel supply chains currently categorised as Level 1 under the 'Imported Inorganic Bulk Cargo Fertiliser Assessment and Management Policy' will be assessed on a case by case basis when making an application for audit under this Policy. These applicant will need to submit documentation in relation to quality assurance procedures for the container inspection and loading components of the supply chain.

The process of approval incorporates the following principles:

- appropriate level of rigor in the assessment process;
- equity between the assessment of different applicants; and
- transparency in the process.

### Documentary Evidence Required For a Level 1/Level 2 Supply Chain Application

1. The importer's details, including contact name, phone and fax number and email address.
2. Contact for an Australian based and registered company, who will provide the first point of contact for the department within Australia.
3. The type of facility including diagrams/pictures and extensive plans of the plant.
4. A brief description of the processes that the facility performs.
5. The country of operation, including a brief history of operation.
6. A site plan particularly in relation to storage, bagging and container loading facilities. (For each site include a description (and images if applicable) of the infrastructure, surrounding areas, storage areas, site security, and proximity to other parts of import pathway e.g. wharves, consolidation sites.)
7. A list of types of fertiliser manufactured at the site.
8. A copy of the manufacturer's quality assurance and/or work procedures describing how biosecurity risk management processes will be incorporated and managed throughout the entire supply chain including with suppliers, contractors and sub-contractors.
9. A flow chart identifying all movements of the fertiliser from mine to container loading. Steps should include the mine/plant location, manufacturing location, bagging, transportation and container loading facility.
10. Storage including terminal storage, container terminals and cleaning processes. List of all commodities stored in the same facilities and other commodity storage facilities nearby in the area.
11. Methods of transport including barges, railway, trucks and conveyor systems as well

as measures to ensure the integrity of the product is maintained. This should include all other commodities which are transported using the same transportation or are transported in the direct vicinity and the cleaning process (if any) of transport.

12. Container loading facilities including bottom dumpers, hoppers, grabs, front-end loaders, conveyors and any other transfer equipment used. This should include all other commodities, which are loaded using the same facilities or are loaded in the direct vicinity of loading facilities and the cleaning process (if any).
13. Details of the inspection location and access to treatment facilities.
14. Full Container Inspection Reports for a minimum of 3 consecutive consignments with a total of 50 or more containers from the nominated supply chain.
15. A signed declaration from the manufacturer stating that they are prepared to provide the independent audit report every year, and that the department will be notified in writing, of any changes made to the manufacturing process, or supply chain.

### **Additional requirements for Level 1 only**

1. A nominated date when the offshore inspection will occur and the expected duration.
2. Details of how samples are drawn for analysis and by which parties and what International Standards are applied.
3. Details of sampling process, manual or automatic.
4. A signed declaration from the manufacturer stating that they are prepared to undergo a departmental audit, or an audit by a new third party auditor every three years to maintain Level 1.
5. Details of person to accompany the departmental officer for the onsite audit or contact details for overseas appointed person.

For current fees for the desk audit and off shore audit activities or for initial advice on making a submission contact the department at [airandseacargo@agriculture.gov.au](mailto:airandseacargo@agriculture.gov.au).

Applications should be made in writing (in English) and provided in electronic copy to:

Department of Agriculture – Audit and Assurance Group

Email: [auditservices@agriculture.gov.au](mailto:auditservices@agriculture.gov.au)

## **Attachment 2: Onsite Audit**

### **Background**

Onsite audits are designed to confirm that the manufacturing processes, sampling procedures, transport operations, storage, and container inspection and loading facilities provide a high level of confidence in the biosecurity integrity of the consignment.

To achieve and maintain a Level 2 status, onsite audits should be conducted by a suitably qualified Independent Third Party Auditor every year. Third party auditors must be

independently accredited and registered with an International Auditing body.

To achieve and maintain a Level 1 status, in addition to the Level 2 requirements, an onsite audit must be conducted by an authorised departmental officer every three years, or by a new department authorised auditor every third year.

Independent third party auditors should address all of the points as set out below, and supply photographic evidence, or copies of the supply chain procedural documents to support information collected through the on-site audit process to allow the department to review the evidence.

Where auditors do not supply sufficient evidence or information for the department to assess the audit outcomes, the department may seek additional information following the submission of an audit report, or reject a report, where this additional information is not provided within reasonable timeframes.

### **Audit details**

*Auditor:*                      Name:  
  
   Title:  
  
   Company:  
  
   Qualification:

### *Accompanied by:*

The aim of this audit was to assess the                      supply chain through                      container loading in relation to its ability to achieve/maintain classification as a Level 1 or Level 2 Manufacturer/Supplier. The objective of the audit was to ensure all biosecurity risks associated with the supply chain from manufacture, processing, storage, handling, container cleanliness and container loading are identified and controlled. The audit identifies how the biosecurity risks are being addressed/controlled to minimise the potential for contamination of containerised fertiliser imports into Australia.

## Initial Checklist

1. Is the manufacturing facility located at the container loading facility? YES/NO

If yes, is the container loading facility used for fertiliser only (i.e. dedicated)? YES/NO

2. Is the product brought to the loading facility by an external transport mode? YES/NO

If yes, provide brief details of transport mode:

- ☐ Truck
- ☐ Rail car
- ☐ Barge
- ☐ Conveyor
- ☐ Other

If other, describe:

3. Is the transport system used for fertiliser only (i.e. dedicated)? YES/NO

4. Is an intermediate storage facility used? YES/NO

If yes, is the intermediate storage facility dedicated for fertiliser? YES/NO

5. Are there any points in the supply chain where other products (including soil, seed, wood chip etc) come within close proximity to finished fertiliser?

YES/NO

If yes, please describe:

## Manufacturing Details (provide photographic evidence where possible)

1. Where is the manufacturer located in relation to the container loading facilities?
2. List the types of fertiliser manufactured on site.
3. Does the manufacturer have quality assurance and/or work procedures in place for storage/handling of products?  

YES/NO

If yes, provide details including dates of last audits if applicable.
4. Inspect the handling systems at the plant (pay loaders, conveyor systems, etc). Do they provide sources of possible contamination?  

YES/NO
5. Are there possible contaminants being produced, manufactured or handled in the local area?  

YES/NO

If yes, list the possible contaminants.
6. Is the plant clean and tidy?  

YES/NO
7. What procedures are in place to reduce the known biosecurity risks?
8. Are there evident sources of cross contamination?  

YES/NO

If yes, list the sources.

9. Is there traffic/transport through the site that could potentially carry contaminants?

YES/NO

If yes, how are these dealt with?

10. After manufacture, is the product screened prior to storage, transport or loading?

YES/NO

If yes, describe the screening process.

11. Check raw product receival areas and detail cross contamination issues.

12. Are second-hand bags used for storage of raw product?

YES/NO

If yes, list the products previously stored in the bags.

13. How is the raw product delivered to the site?

## Storage Facilities

1. State location of storage facility (note: there may be multiple intermediate storage facilities).
2. What information is provided to workers on biosecurity control?
3. What signage is used at the facility that relates to contamination and quality control?
4. Check records of hygiene activity and company inspection of flow paths
5. Does the plant perform regular vermin baiting programs? YES/NO
6. Provide an assessment of the storage facility(s):
  - a) list all commodities stored in the storage facility
  - b) describe the cleaning process employed, if any:

c) describe the storage facilities for other commodities in the area:

d) describe the standard of facility used:

e) describe the means for separation of product:

f) describe how the product is brought in/out of the facility:

g) describe the procedure for checking cleanliness of the transport mode used:



## Transportation

- 1 What method/s of transport is used to move the fertiliser to the container loading facility?
- 2 For each method stated, identify:
  - a) all other commodities transported using the same system:
  - b) all other commodities transported in the direct vicinity:
- 3 Provide details of the cleaning/inspection process followed and inspected.
- 4 Detail who provides inspection certification, declarations and check compliance with any quality systems.
- 5 Provide details of where, when and how inspection is undertaken.
- 6 Is there a QA procedure covering the inspection and certification procedure? YES/NO
- 7 Provide details of ISO Accreditation.

- 8 Date of last independent audit/s.
- 9 Verify audit records.
- 10 What is the procedure in case of contamination for each section of the transport chain?
- 11 If the product is transferred to another mode of transport, outline details of the following:
  - a) transfer equipment used:
  - b) is equipment dedicated:
  - c) cleaning procedures in place:
- 12 If railcar dump pits/truck dump pits are used, outline details for each leg of transport chain including:
  - a) inspection procedure followed:
  - b) certification procedures followed:

## Container Loading Facilities

1. Provide details of the type of load-out facility.
2. State all equipment used (e.g. belt conveyors, bottom dumpers, hoppers, reclaimers, front end loader, elevators) in the loading procedures.
3. For each identify:
  - a) all other commodities loaded using the same system:
  - b) cleaning procedure followed:
  - c) certification of cleanliness provided:
4. Who provides certification of cleanliness?
5. Identify who is responsible for cleanliness of equipment and checking records?
6. Is there an inspection by a qualified independent person?

If no, does there need to be?

YES/NO

7. Inspect and report on the storage areas?
8. Is there separation/segregation of product?
9. Is there cleaning between products?
10. Detail sampling facilities and procedures to be used at the container/bagging load facility during export out-loading.
11. In the event of contamination what facilities are there for container/product rejection/discharge?
12. Verify and report on container inspection /treatment documentation, sampling logs and analysis.

## Assessment

[Proforma to be used for Independent Third Party Auditors]

I hereby attest that the procedures, operations, and pertinent infrastructure identified in the Site Audit Report dated (date) have been checked by (insert name, company).

I further declare that the management of the manufacturer producing the fertiliser, is committed to ensuring that the manufacture, storage, supply chain and load facilities continue to comply with the requirements instigated and documented at the initial departmental audit.

Overall Audit Result: PASS/FAIL

Name and Position of Independent third party auditor

---

Signature

/ /  
Date

## Attachment 3: Template for Manufacturer's Declaration

*(Insert letter head of Manufacturer)*

### Manufacturer's Declaration

Date: \_\_\_\_\_

Product: \_\_\_\_\_

Bill(s) of Lading: \_\_\_\_\_

Location Loaded: \_\_\_\_\_

Location Inspected: \_\_\_\_\_  
(if different from location loaded)

Container number(s)	Tonnes	Seal No

WE HEREBY DECLARE that the product type, manufacturer, process plant and supply chain to container loading have had no alterations to the premises or associated machinery that would increase the likelihood of entry of animal / plant / soil material or their by-products entering the consignment listed above.

We further declare that:

- the fertiliser is mined or chemical, that no organic animal, plant or microbial constituents are used in the manufacture of the fertiliser; and
- if bagged, that all bags are clean and new; and
- the containers identified have been inspected and no biosecurity risk material or infestation exists.

#### Sampling Declaration - For Level 1 only (strike out if not applicable)

We confirm that a representative sample of the products listed above have been independently drawn in accordance with accepted procedures agreed upon and instigated at the initial departmental audit. Analysis and visual examination for biosecurity contaminants and infestation has been performed under the auspices of a certified approved laboratory or suitably qualified third party inspector, and that based on that inspection, no contamination or infestation was detected.

CERTIFIED TRUE AND CORRECT

\_\_\_\_\_  
Title person giving signature

\_\_\_\_\_  
Authorised Manufacturer's Representative Signature

## Attachment 4: Template for Container Inspection Record

### **EMPTY CONTAINER INSPECTION RECORD**

**Name of inspector:**

**Exporter:**

**Date of inspections:**

**Inspection Location:**

**Product:**

Container Number	Seal Number	Pass/Fail	Treatment/Rejection	Action/Comments

**Signature of inspector:** \_\_\_\_\_

**Date:** \_\_\_\_\_

<b>Reason for failure</b>	<b>LI</b>	One or more live pests in residues or on structure inside or out.
	<b>LR</b>	One or more live rodents, or evidence of rodents harbouring behind linings.
	<b>IR</b>	Any residue infestible by pests.
	<b>SD</b>	Structural damage (includes vents).
	<b>NI</b>	Non-infestible materials, odour, water, rodent carcasses or rodent droppings.
<b>Treatment</b>	<b>R</b>	Rejected for loading
	<b>T</b>	Treatment or repair ordered

## Attachment 5: Department of Agriculture Sampling Standard for Containerised Fertiliser

### Introduction

Sampling is a key function of the analytical process. Regardless of the quality of the final laboratory analysis or inspection, the degree of accuracy of the results rely on the initial sampling operation and how this was performed.

Sampling may be carried out by either mechanical or manual means. The manner by which increments are collected or how sampling is carried out is potentially the most important step in this process. In this document, methods will be addressed for the collection of samples of solid bulk fertiliser at the container load point.

### Sampling principles

The basic purpose of sampling is to collect a manageable mass of material that is representative of the total mass of material from which it was collected. The manageable mass of material is called a sample and is subject to certain preparation procedures, which render it suitable for either physical or chemical analysis.

The frequency of sampling, sample size and sample processing are determined by the application of various theories and applied statistics, from which sampling standards have been developed. There is a requirement to collect increments from all parts of the lot, and therefore it is necessary that the total lot is accessible. In summary, it is fundamental that all particles in the lot have the same probability of being included in the final sample. This is one of the key principles of this sampling process.

### Methods for sampling of solid bulk fertiliser

#### Mechanical sampling

Mechanical sampling is the collection of increments by mechanical means. It is the most reliable method for the extraction of representative samples. Mechanical sampling systems have several advantages over manual sampling, some of which are obtaining samples with better overall precision, ability to collect primary increments from the full cross section of the stream in a single pass (particularly applicable with today's large lots and high capacity flow rates) and ability to sample at the required frequency and is generally a lot more reliable and economical, due to labour costs reduction.

All sampling systems should be operated and maintained according to the original design and manufacturer's recommendations. It is essential that all personnel involved with the sampling system be made aware of the significant contribution that correct sampling has in overall process and quality control. It is essential that personnel are provided with on-site training in the principles of sampling, operation and maintenance of the sampling system.

It is essential that sampling systems be regularly inspected and audited to ensure correct sampling and compliance to original design and applicable standard. At a minimum, the three following steps should be used for quality measure of mechanical sampling systems.



1. Critical Inspection – inspection of a sampling system, observing the system under dynamic and static conditions, checking if system components conform to manufacturer design specifications. The critical inspection provides current operating information about the sampling system, recommendations for operation and maintenance.
2. Bias Test – a precision test to evaluate the performance of a sampling system by determining if samples collected and processed by the mechanical sampling system are being collected without bias, with respect to reference samples collected during a test interval.
3. Statistical Process Control (SPC) – in conjunction with periodic critical inspections, SPC is used to give assurance that the same conditions as existed during the bias test actually do prevail throughout the ongoing operation of the mechanical sampling system.

### Manual sampling from conveyor belt

This method provides for obtaining a gross sample of fertiliser by taking increments from high capacity stream conveyor belts. A sample scoop with a 300ml-sample cup and with a three-foot (around 90cm) handle or similar is the preferred tool for sample collection.

Sample increments are taken based on systematic sampling procedures of time base sampling and will vary depending on total tonnage and load rate.

Prior to sampling the belt system must be clean and dry. Material to be sampled should be verified before sampling commences. Conveyor belts that transport solid materials are typically “V” shaped with the centre of the belt at a lower point than the edges. This has a channelling effect on the product and tends to reduce the stream into a line down the centre of the belt. In order to obtain a representative sample, the whole depth of the stream must be penetrated. It should be ensured that all sample increments are of the same size for a truly representative gross sample. The person sampling should stand in a position where they can easily reach the centre of the product stream.

Increments are to be collected by inserting the sample scoop down and into the centre of the moving product stream until the bottom of the belt is reached and collection scoop is full. Extreme care should be exercised during the sampling procedure since the moving product will force the scoop in the direction of the flow. Increments are to be placed in a moisture proof container with full marks for final delivery to the laboratory.

### Sampling Frequency

Sampling rates are based on five sub samples being taken per container using a 300 millilitre individual sampling device at a rate of 1.5kg composite sample for each 20 metric tonnes loaded.

Load rate 100MT per hour = 25 x 300ml samples per hour

Load rate 200MT per hour = 50 x 300ml samples per hour

Example 20 x 20’FCL’s loaded at a rate of 100MT per hour either bagged or bulk. Using 300ml sample cup, 25 samples required per hour requires one sample every 2.4 minutes. This could be rounded to one 300ml sample every 2.5 minutes.

## Variation in sampling standards

Supply chains requesting a variation in sampling standards outlined above must submit a request in writing to the department for assessment. This request can be submitted as part of the desk audit process. For example, a variation may be submitted for a supply chain that has an existing automatic sampling system in place that can deliver an equivalent composite sample size using a smaller individual sample with an increased sampling frequency.

## Inspection / analysis process

Once drawn, samples will be blended and a composite sub sample is to be sieved and inspected to visually check for organic material contaminants.

Sampled fertiliser is to be sieved using a nest of sieves, designed to separate contaminate material from the product being examined. The nest will incorporate at least 2 layers of sieves; with a base dish at the bottom. The sieves will be arranged such that the one with the greatest aperture is on top, descending in order of aperture size so that the finest sieve is at the bottom, adjacent to the dish.

At the completion of each sieve load, any residue is to be examined under lighting of min 600 lux intensity. If necessary, magnification lamps or magnifying glasses will be used to identify residues. The inspection is to be performed under the auspices of a certified approved laboratory or suitably qualified third party inspector.

## Definitions used in this Sampling Standard

The following definitions apply to this document. The terms in the Definitions section of the 'Imported Inorganic Containerised Fertiliser Assessment and Management Policy' also apply. Definitions apply when used in both single and plural. Where terms are not defined, the definitions that apply under the [Biosecurity Act 2015](#) prevail.

Term	Definition
<b>Bias</b>	The tendency to obtain a value that is either persistently higher or lower than the true value
<b>Division</b>	The process of decreasing the sample mass (without modification of the particle size distribution) where a representative part of the sample is retained while the remainder may be rejected
<b>Error</b>	The procedures of sampling, sample preparation and analysis which are necessarily imperfect and the experimental results will be dispersed about the true figures.
<b>Gross sample</b>	A sample formed when all increments collected from a lot are combined for reduction to a laboratory, or the total

	quantity of increments.
<b>Increment</b>	The quantity taken by a single pass of the sampling device.
<b>Lot (sample portion)</b>	A quantity of fertiliser delivered at one time. The lot may be composed of one or more sampling units or sub-lots
<b>Manual sampling</b>	The operation of sampling when the increments forming sub samples and gross samples are taken by human effort using a hand held implement.
<b>Mass basis sample</b>	The method of taking increments at uniform mass intervals throughout the sampling unit or lot.
<b>Mechanical sampling</b>	The operation of sampling when the increments forming sub samples and gross samples are taken by a sampling machine.
<b>Precision</b>	A measure of the way in which a set of observations agree with each other.
<b>Preparation</b>	The process of preparing the sample for analysis or testing.
<b>Reduced sample</b>	Intermediary sample obtained after mixing and reducing the gross sample.
<b>Sampling unit</b>	The discrete units (railcar, sections of belt, daily production) which comprise the lot.
<b>Time basis sample</b>	The method of taking increments at uniform time intervals throughout the sampling unit or lot.