

CONTENTS

1.	PURPOSE	4
2.	SCOPE	4
3.	DEFINITION OF TERMS	4
4.	PREREQUISITE REQUIREMENTS	7
4.1.	Transportation and storage	7
4.2.	Accepted methods of transport.....	8
4.3.	Transfer certificate	8
4.4.	Equipment use and maintenance.....	8
4.4.1.	Frequency of maintenance	8
4.5.	Sanitation and pest control	9
4.5.1.	Overall cleanliness and hygiene of facility	9
4.6.	Work health and safety	9
4.7.	Contingency arrangements	9
4.7.1.	Non Compliant Goods (NCG)/Rejected Goods	9
4.7.2.	Re-inspection of ECG	10
4.7.3.	Procedure for rejection of prescribed goods.....	10
4.8.	Documented inventory system	10
4.8.1.	Receivables	10
4.8.2.	Routine sanitation and Treatments details	10
4.8.3.	Outturn.....	10
4.8.4.	Operational processes.....	11
4.9.	Sampling system.....	11
4.10.	Hazard Identification Mitigation Survey (HIMS).....	11
4.10.1.	Identification of hazards	11
4.10.2.	Steps	11
4.10.3.	Eliminating hazard	12
4.11.	Record keeping.....	12
4.12.	Prohibited activities	12

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 2 of 20

5.	APPLICATION PROCESS.....	13
5.1.	Application form.....	13
5.1.1.	Application documents received by DAFF	13
5.1.2.	Site Visit/Audit/Inspection of an Establishment.....	13
5.2.	Layout of the establishment	14
5.3.	Site Map and flow path sequence	15
5.4.	Aerial Map.....	15
5.5.	Drawing flow paths.....	16
5.6.	Accuracy.....	Error! Bookmark not defined.
5.7.	Approval of ECGS.....	Error! Bookmark not defined.
6.	AUDITS.....	17
6.1.	Audit Types	18
6.2.	Auditor Accreditation.....	18
7.	NON COMPLIANCES	18
7.1.	Grounds for suspension of registration of an ECGS.....	19
7.2.	Period of suspension and Re-application	19
7.3.	Suspension at the request of the occupier	19
8.	RELATED MATERIAL.....	19
9.	APPENDIX A - DETAILED VERSION HISTORY	20

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 3 of 20

1. Purpose

To provide detailed guidelines for the operation of a registered export establishment approved for Export Compliant Goods Storage (ECGS).

2. Scope

The Department of Agriculture, Fisheries and Forestry (DAFF) outlines the requirements for the approval and implementation of an ECGS designed to establish biosecurity assurances and security leading to inspecting goods prior to point of export.

The procedures in this document apply to the storage and movement of export compliant prescribed goods within and between ECGS registered establishments. This document should be read in conjunction with the Export Compliant Goods Storage (ECGS) policy document, Plant Exports Operation Manual (PEOM), and site specific work plans and audit instructions.

Procedures in this document are intended for use by DAFF Authorised Officers (AOs) and persons involved in the operation and management of a registered export establishment approved for ECGS.

3. Definition of terms

Refer to Table 1 for definition of terms used in this Reference Guide.

Table 1: Definition of terms used in Reference Guide

Term	Definition
Application form	A specific form used for making an application for the approval of ECGS.
Audit	<p>Surveillance Audit: An audit carried out at the site where inspection activities are undertaken, which examines the specific components of the ECGS that are related to confirming that the prescribed goods meet import conditions and DAFF requirements.</p> <p>Desktop Audit: Desktop audit is the review of quality documents of an organisation to ensure compliance with DAFF's ECGS requirements and to allow the auditor to familiarise themselves with the auditee's quality system. This is done prior to a regular physical audit.</p> <p>Systems Audit: An audit carried out on all components of the establishment including ECGS that relates to its ability to meet the requirements of agreed DAFF standards.</p>
Authorised Officer	Authorised Officer (AO) refers to specially trained and

Term	Definition
(AO)	assessed individuals who are authorised to perform specific export inspection or sampling functions in accordance with Australian export legislation.
Consignment	A quantity of plants, plant product and/or articles being moved from one country to another and covered, when required, by a Phytosanitary certificate(s). A consignment may be composed of one or more commodities or lots (ISPM 5).
Contamination	Presence in a commodity, storage place, conveyance or container, of pests or other regulated articles, not constituting an infestation (ISPM No. 5). Quarantine risk material including, but not limited to, soil, field insects, carcasses, dirt, faeces, leaves, twigs, grass and any other plant or animal material adhering to goods, included with goods or associated with packaging accompanying goods.
Control Point	A step in a system where specific procedures can be applied to achieve a defined effect and can be measured, monitored, controlled and corrected (ISPM No. 14).
Export Compliant Goods Storage (ECGS)	An approved receptacle within a registered export establishment where export compliant goods are stored prior to export. These goods remain export compliant for 28 days after the date of inspection.
ECGS Registered Establishment	A registered export establishment that has been approved by DAFF to operate an ECGS facility.
Export Compliant Goods (ECG)	Goods that have been found after inspection to be free from live pests, contaminants within allowable limits and in a condition that allows any Phytosanitary or other certificate to be issued to meet Australian legislative and importing country requirements.
Infestation	Presence in a commodity of a living pest of the plant or plant product concerned. Infestation includes infection as well (ISPM No. 5).
Non Compliant Goods (NCG)	Goods are considered non-compliant if live pests and contaminants above tolerance have been found during inspection or the goods do not meet Australian legislative or importing country requirements.
Non-conformity (major)	A deviation (or multiple deviations) from the documented compliance agreement that compromises the integrity of the arrangement in such a way that immediate corrective action/regulatory investigation is required by DAFF. Generally involves a breach of the legislation.

Reference Guide Export Compliant Goods Storage (ECGS)

Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 5 of 20

Term	Definition
Non-conformity (minor)	A deviation (or multiple deviations) from the documented agreement that may compromise the integrity of the arrangement if left unchecked for some time. Generally involves minor changes in the procedure mostly by mistakes such as signs missing or illegible, absence of lights.
Non-injurious pests	Suspected field species that are not considered as stored product pests and generally picked up during harvest. Irrespective of whether a pest will survive, there is a level of infestation that could be detrimental for Australia's international export reputation.
Pathway	Any means that allows the entry or spread of pests (ISPM No. 5).
Pest (Plant Pest)	Any species, strain or biotype of plant, animal or pathogenic agent injurious to plants or plant products (ISPM No. 5). Pest includes an organism associated with the pathway, which poses a risk to human or animal or plant life or health (SPS article 2).
Plant products	Unmanufactured material of plant origin including grain and those manufactured plant products that, by their nature or that of their processing, may create a risk for the spread of pests (ISPM No. 5).
Prescribed goods	Plants and plant products for which a phytosanitary certificate or any other official certificate is required by an importing country authority.
Registered Export Establishment	A registered establishment engaged in the preparation (including storage, handling and loading) of prescribed goods for exports.
Risk	The likelihood of hazard causing injury or disease or mixing of export compliant and non-export compliant goods or maintaining the integrity of export compliant goods. It is measured in terms of consequences and likelihood. A common definition of risk is the combination of a specific hazard and the likelihood that the hazard occurs (probability x hazard). That likelihood may be expressed as a rate or a probability.
Risk assessment	The process of analysing the potential losses from a given hazard using a combination of known information about the situation, knowledge about the underlying processes, and judgment about the information that is not known or well understood. The basic goals of risk assessment include: <ul style="list-style-type: none"> • identify potentially hazardous situations

Term	Definition
	<ul style="list-style-type: none"> • apply appropriate methods to estimate the likelihood that a hazard occurs, and the uncertainty in that estimate • provide alternative solutions to reduce the risk • estimate the effectiveness of proposed solutions • provide information to base a risk management decision • estimate the uncertainty associated with the analysis.
Risk management	The process of combining a risk assessment with decisions on how to address that risk. Risk management is part of a larger decision process that considers the technical and social aspects of the risk situation.
Risk estimate	A measure of risk in terms of a combination of consequence and likelihood assessments. Risk estimation can be done in several ways including historical data, mathematical modelling, breaking down the system into known subsystems, analogy with similar situations, comparison with similar activities and a combination of various methods.
Sample	Method of collecting a representation of a commodity based on a sampling plan in order to ascertain pest levels or for other testing such as viability.
Standards/Specifications	The document or part thereof, that prescribes the requirements with which the plant product or export establishment with approved ECGS has to comply.
Treatment	Official procedure for the killing, inactivation or removal of pests or for rendering pests infertile or for devitalisation (ISPM No. 5).
Verification	The confirmation by examination and provision of objective evidence that specified requirements have been fulfilled.
Visual inspection	The physical examination of plants, plant products, or other regulated articles using the unbiased eye, lens, stereoscopes or microscope to detect pests or contaminants without testing or processing (ISPM No. 23).

4. Prerequisite requirements

The prerequisite for registered export establishments intending to apply for approval of ECGS are outlined in this section.

4.1. Transportation and storage

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 7 of 20

Goods at the ECGS establishment must be transported, stored and handled in a manner which ensures that goods do not become contaminated once they have been passed as export compliant by an AO. Transportation and storage records at the ECGS establishment must be documented with an ability to trace back the inspected goods from the ECGS through to the source.

ECGS receptacles must prevent the entry of pests, vermin, rodents, moisture and other contaminants, ensuring the integrity of ECG is maintained. An ECGS is to be constructed with suitable material to minimise cross-contamination and re-infestation of ECG. Any storage conditions that may potentially compromise the integrity of ECG must be addressed and rectified as soon as detected. AOs must ensure that the ECGS has been cleaned thoroughly and that there is no residue that may harbour pests and contaminants prior to loading ECG.

4.2. Accepted methods of transport

ECG can be transported from one ECGS to another ECGS or to the point of export as long as phytosanitary integrity of the goods is maintained by inspecting transport units including trucks, rail wagons, and containers. The AOs must conduct the flow path inspection and ensure the mode of transport is export compliant and will not alter the integrity of the goods passed as export compliant. The transport unit must be inspected and passed as export compliant before loading ECG into it.

4.3. Transfer certificate

Where ECG are transferred between various ECGS establishments, the AO shall issue a transfer certificate for each consignment. The integrity of the ECG and the transport must be maintained during this process. The AO must ensure the pathways and transport units are suitable for transporting ECG with minimal risk of cross-contamination or re-infestation during the transfer process.

4.4. Equipment use and maintenance

Any equipment used in the ECGS process must be maintained in a manner to prevent contamination/re-infestation of ECG. Equipment must be able to be visually inspected with maintenance records documented and presented for audit if required.

4.4.1. Frequency of maintenance

The establishment must provide adequate programs for maintenance of the establishment and equipment, calibration of monitoring equipment, and validation of treatment equipment. The flow path and the conveyor or transport used to convey goods from the point of inspection to the ECGS must be cleaned and properly maintained with minimal risk of cross-contamination or re-infestation. Where available

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 8 of 20

it is recommended that Australian Standards or manufacturers' recommendations be considered and followed for the maintenance of various equipment used.

4.5. Sanitation and pest control

All elements must be monitored and controlled and the establishment with ECGS is to maintain appropriate records. The hygiene process and management system must be documented.

4.5.1. Overall cleanliness and hygiene of facility

An appropriate standard of hygiene is required to be maintained at registered export establishments at all times to minimise any risk of cross contamination, harbouring of pests, or transferring contaminants to ECG within ECGS.

Importing countries may also require additional hygiene measures from registered export establishments, allowing for the export of certain goods from those establishments must also adhere to those additional requirements.

The owner/occupier of ECGS must maintain the facility including ECGS in a hygienic condition to control pests including vermin and have a defined program of hygiene and pest control. The records of cleaning and pest control activities must be documented in sufficient details to enable DAFF to monitor the effectiveness of pest control measures as per requirements for export registered establishments.

4.6. Work health and safety

The establishment must have a defined Work Health and Safety Policy and documented procedures.

4.7. Contingency arrangements

ECGS registered establishments must have a well defined and documented procedure and policy for managing NCG.

4.7.1. Non Compliant Goods (NCG)/Rejected Goods

Goods that are inspected and found to be infested with live insects and/or contamination above specified tolerance levels are NCG and must be rejected in accordance with the relevant work instruction. Rejected goods must be treated prior to being re-presented for export inspection as per the relevant work instruction.

NCG/rejected goods must be segregated from ECG so they pose no risk of cross contamination. Segregation may include a physical barrier between lots, identification marks on lots or a specified

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 9 of 20

separation distance between each lot. The ECGS must be clearly marked and easily distinguished from other storages within the establishment.

4.7.2. Re-inspection of ECG

Re-inspection of ECG is necessary if:

- (a) time between inspection and export exceeds 28 days
- (b) maximum time between inspection and export permitted by the importing country is exceeded
- (c) AO has reason to believe conditions have changed

When an importing country's requirement is different from 28 days, the importing country's requirement takes precedence over the normal export compliance period.

4.7.3. Procedure for rejection of prescribed goods

Refer to relevant PEOM and commodity Work Instruction for details.

4.8. Documented inventory system

The establishment must maintain accurate records and traceability for all receivables, treatments, outturn, and operational processes through the facility. There must be a defined identity preservation system in place for all commodities.

4.8.1. Receivables

Export registered establishments are required to keep and maintain records of goods received for traceability for two years. These records must be presented to DAFF when requested.

4.8.2. Routine sanitation and Treatments details

Records of routine cleaning, sanitation and pest control measures must be documented and maintained for up to two years. Details of treatments applied, including, where appropriate, details of fumigation (name, dosage and time) should be recorded in appropriate form.

4.8.3. Outturn

The export registered establishment operators are required to keep records of the quantities of prescribed goods stored in ECGS and consequently exported to various markets after the inspection was conducted.

Goods inspected, passed as export compliant and stored within ECGS can be exported within 28 days from the initial inspection into each ECGS.

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 10 of 20

Prior to outturn:

- flow path from ECGS to point of export or transfer must be inspected and passed as per the relevant work instruction.
- AO must verify that goods intended for export/transfer were inspected and passed as export compliant within 28days.

4.8.4. Operational processes

Export registered establishments are required to document operational procedures including the cleaning of receptacles prior to being loaded with ECG, the point of inspection to ECGS and to the point from where goods are to be exported. The operational procedures used must maintain the integrity of the inspected goods and address the issues of re-infestation and cross-contamination of ECG.

4.9. Sampling system

A sampling system must meet the requirements of Australian legislation with collection system that delivers a representative sample.

Please refer to the PEOM and the relevant Work Instruction.

4.10. Hazard Identification Mitigation Survey (HIMS)

All steps in the ECGS process must be assessed to consider the risk of goods contamination prior to ECGS approval (refer to HIMS doc). Hazards need to be identified and preventative measures implemented to minimise or eliminate those risks.

4.10.1. Identification of hazards

The occupier/operator of an ECGS must complete the HIMS and identify and provide control measures for potential hazards that may result in cross contamination, poor ECGS maintenance and upkeep, etc.

4.10.2. Steps

Each step is a location or procedure which, if controlled, can prevent, minimise or reduce a hazard to an acceptable level. Steps in the preparation of the prescribed goods for export must be controlled to either eliminate or reduce the hazard to an acceptable level.

Following are three basic steps used to manage risks:

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 11 of 20

- Identify the hazard
- Assess the risk
- Mitigate the risk by elimination, substitution, safeguards, etc.

It is vital that the numbers of steps are kept to those in the preparation of prescribed goods that are truly critical to product security. This usually means that the numbers of steps must be kept to a minimum in order to focus attention on the essential controlling factors in the flow path. The information established during the hazard identification and analysis should allow the identification of steps.

Some of the steps used in identifying the risk for ECGS include sampling collection points, transport from sampling point to storage, storage of goods, transport from storage to point of export.

The occupier of a registered export establishment must have a documented HIMS. Please refer to relevant Work Instructions for details. A system which identifies specific hazard(s) and preventative measures for their control is available at <http://www.daff.gov.au/aqis/export/plants-plant-products/plantexportsmanual/resources#a4>

4.10.3. Eliminating hazard

Once a hazard has been identified, a series of steps/control points have to be followed to minimise or remove the risk. Control points identified in the HIMS will undergo assessment by DAFF in the application process and may require follow up assessment to ensure effectiveness.

4.11. Record keeping

The management of an approved ECGS shall maintain all records for a minimum period of two years. The records are maintained to provide verification that the ECGS is consistently meeting agreed requirements. All documentation should be made available for review at the time of audit. Documentation that shall be retained for two years for ECGS includes but is not limited to:

- ECGS registration
- traceability records, retained to a level that identifies the pathway of all ECG that have been stored in the ECGS
- traceability of NCG and associated treatments
- audits and hygiene records of ECGS, including flow path inspections.

4.12. Prohibited activities

The registered establishment must ensure that any activities that could potentially compromise the integrity of the ECGS or ECG must not be carried out in defined

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 12 of 20

ECGS and inspection areas. Prohibited activities may include but are not limited to:

- mixing of goods passed as export compliant, with goods that were rejected during inspection or with goods that have not been inspected
- transportation of ECG with rejected goods or with goods which have not been inspected
- mixing of ECG for different markets that have less stringent phytosanitary import conditions.

5. Application process

5.1. Application form

To have an ECGS approved the following documents are mandatory:

- application on approved form
- full details of the ECGS and registered export establishment for evaluation, at least four weeks prior to the proposed starting date of service or operations.

5.1.1. Application documents received by DAFF

Once an application has been received, it will be reviewed by DAFF to ensure it contains all of the required information and meets the prerequisites (see section 4.1 for details). If the application is found to be satisfactory, it will progress to a site visit. If, however, the application is found to be incomplete or does not meet the prerequisite requirements, the establishment will be notified within 10 working days of DAFF receiving the application. In the case of an incomplete application, the establishment has a period of 10 working days after notification to supply the missing information to DAFF.

5.1.2. Site Visit/Audit/Inspection of an Establishment

Once the application form has been assessed, DAFF will organise a time with the occupier/operator of the establishment for a site verification assessment. The purpose of the assessment is to verify and ensure that the establishment complies with all requirements.

Establishments registered for more than one export function will be assessed against all applicable inspection requirements for each function separately.

DAFF Officers will conduct the site visit. The officers will inspect the establishment and assess the suitability of the site for ECGS including risk management strategies.

The evaluation undertaken by DAFF officers or an authorised person involves a physical audit of the registered export establishment against

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 13 of 20

agreed standard, mandatory pre-requisite and where appropriate, other standard(s) including:

- preliminary system audit of the registered export establishment including the proposed ECGS
- any other non-compliances identified by the earlier audits of the establishment being addressed immediately.

DAFF Officers must assess the ECGS, the flow path and machinery and equipment used in handling the ECG and NCG. The inspection may involve:

- bulk commodity terminal
- export packing facilities for prescribed goods
- small packing facilities
- flow path from point of inspection to ECGS and to point of export.

Once inspection of the establishment is complete, the DAFF officer must then make a decision as to whether or not to endorse the application. This decision is based on the officer's observations made during the inspection and any associated documentation presented with the application form. If an officer endorses the application, it is signed and then forwarded to DAFF for further processing.

If the officer does not endorse the application, the officer must record this and advise the occupier/operator of the establishment that the establishment cannot be approved for ECGS at this time and the reasons behind this decision.

When DAFF is satisfied that all requirements have been met, the premises will be approved for ECGS and a certificate of approval sent to the occupier/operator. The certificate of approval will detail any conditions and/or restrictions applying to the registration.

Approval of ECGS is not time-limited and will remain valid until revoked by DAFF, or otherwise notified by the occupier, or where the establishment fails the annual audit for determining compliance with all requirements.

5.2. Layout of the establishment

The occupier/operator of a registered export establishment must provide the following information while seeking approval for an ECGS:

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 14 of 20

- a simple plan of the establishment showing location of major items including equipment, and receipt and outloading areas. Product flow paths should be clearly indicated, with particular attention to any common conveying equipment and cross-over of product lines, where there is a potential for cross-contamination or residue build up. Plans can be drawn over the top of an aerial photo provided that they are neat and clear.
- the occupier/operator of the proposed ECGS must provide the name and business address of the registered export establishment. If the occupier/operator is a corporation – the name and address of the person, or each person, who is to manage or control the operations to be carried out in the establishment must be provided. If the occupier/operator is a partnership – the name and address of the partners must be provided
- the location of the premises, including a locality map showing the site in relation to the local area
- the external boundary of the premises
- plans or diagrams giving the general structural and operational layout of the registered export establishment including:
 - all major dimensions, the scale and include details of inspection facilities and any required amenities
 - a site plan showing all salient features of the site and adjoining sites including the location of the establishment and the proposed ECGS
 - elevations of all buildings of the establishment
 - a general floor plan and a floor plan of processing areas, showing all permanent fixtures and the layout of equipment
- a product flow chart and main features of product flow and details of the type of goods to be handled.

5.3. Site Map and flow path sequence

The occupier/operator of the registered export establishment must provide a drawn site map showing the location of the establishment, including a locality map showing the site in relation to the local area and the location of ECGS. A floor plan of processing areas, showing all permanent fixtures, the layout of equipment and flow path should also be provided to DAFF with the application (refer Table 2).

The flow path sequence must be overlaid over the site map using symbols described in Table 2. Flow path can be divided into various distinct segments such as location of sample collection point, sampling point to ECGS, diversion of rejected goods away from ECGS, intake of ECG into ECGS, intake of NCG/rejected goods into a hospital bin and transportation from ECGS to the point of export.

5.4. Aerial Map

A photographic aerial map drawn up to scale and defined using GPS coordinates (either decimal latitude and longitude or UTM) or equivalent of the entire site is required. The map must include all steps of the process from receipt point to

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 15 of 20

inspection and product flow to the final delivery point and the proposed location of ECGS.

The Global Positioning System (GPS) is a satellite-based system that can be used to locate positions anywhere on the earth. GPS provides continuous (24 hours/day), real-time, 3-dimensional positioning, navigation and timing worldwide. Any person with a GPS receiver can access the system, and it can be used for any application that requires location coordinates. The GPS system consists of three segments including the space segment - the GPS satellites themselves, the control system, and the user segment, which includes users and their GPS equipment. The advantage of GPS of an ECGS is that it can be located by an auditor at any time using GPS equipment.

5.5. Drawing flow paths

The method of drawing acceptable flow charts is as follows:

- list all steps including minor steps
- classify and draw the steps as operations, inspection, transportation, or storage using the standard symbols (Table 2)
- each step should be annotated with GPS/UTM coordinates or equivalent for the process location, or be identified on the processing/packing operations map.

Beside each symbol, name:



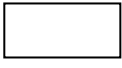

















- inspections performed, and their frequency (e.g. 30 minutes; hourly; daily etc.);
- the titles/reference numbers of log sheets or recording forms used to record inspections; and
- who is responsible for performing the checks and inspections.

5.6. Accuracy

The occupier/operator of an ECGS is required to ensure that all the information provided is accurate, professionally compiled, properly documented and is made available for audit when required. This applies to whole policy including registered export establishment.

Table 2: Symbols that can be used to describe the site plan when applying for ECGS

Feature	Symbol	ECGS
---------	--------	------

Silo storage		
Shed storage		
Bunker storage		
Sample collection point		
Sample delivery and inspection point		
Bi directional conveyor		
Uni directional conveyor		
In load point		
Out load point		
Waypoint		

5.1. Approval of ECGS

If satisfied, the DAFF authorised officer will recommend the ECGS for approval to DAFF. The appropriate delegate of the Secretary will formally offer approval by sending a signed letter of approval to the management of the export establishment where the ECGS is located. Retention of approval depends on ECGS successfully meeting the requirements of the ongoing audits.

6. Audits

The Export Control (Plant and Plant Products) Order 2011 sets requirements for registered export establishments. A registered export establishment needs to comply with these

requirements to ensure products prepared for export comply with Australian legislative and importing country requirements.

DAFF routinely audit establishments against these requirements to confirm that standards have been complied with and that the occupiers have discharged their regulatory responsibilities effectively. A combination of annual, desktop and surveillance audits will be used to monitor compliance. DAFF shall conduct at least one ongoing verification audit annually of each ECGS as part of the establishment registration audit. The frequency of audits could be increased depending on the performance of a particular ECGS. The frequency of audits is based on performance and can be scaled up to quarterly audits for establishments showing marginal performance. However, the standard regime for ECGS is an annual audit conducted in conjunction with registered export establishment audit.

ECGS registered establishments will be subject to periodic audits as per standard export establishments including documented critical ECGS requirements. Registered establishments with an approved ECGS arrangement must demonstrate compliance with the ECGS operation agreement and ECGS policy.

6.1. Audit Types

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

6.2. Auditor Accreditation

The Plant Export Operations auditors will be deemed to be a qualified person if they meet the requirements under subsection 45.5 of *Export Control (Plants and Plant Products) Order 2011*. The auditors are required to undertake specific training to achieve competencies identified in the Plant Export Training Framework. Auditors must be employees of DAFF who are accredited and hold appropriate qualifications. On completion of each audit, the auditor shall provide a written report to the client detailing the audit findings including any non-conformities; agreed corrective actions; and timeframes for which they must be closed out by (usually before the next scheduled audit unless specified otherwise). Standard templates for audit reports will be controlled by Plant Export Operations.

7. Non compliances

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

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

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 18 of 20

7.1 Grounds for suspension of registration of an ECGS

Suspension for approval may be given in writing where a DAFF officer has reasonable grounds to believe that requirements according to legislation are not being met, in relation to:

- the condition of ECGS, product flow paths
- prescribed goods stored in an ECGS

When approval of an ECGS is suspended, this means that prescribed goods stored in the ECGS during the period of suspension are no longer considered as export compliant. The export establishment will return to its normal operational procedure and goods have to be inspected at the end point during the period of ECGS suspension.

7.2 Period of suspension and Re-application

DAFF will determine the suspension period based on the information provided by the DAFF audit officer. This is based on the period thought necessary for the establishment to correct the problem of non-conformities and comply with the conditions of approval of an ECGS. The period of suspension will be determined by the time needed to ensure that:

- prescribed goods can be prepared at the establishment hygienically
- the proper inspection of prescribed goods at the establishment is again possible.

In practice, suspensions can be advised orally informing the establishment manager that ECGS operations have been suspended. Oral suspensions have effect of up to two hours.

For a longer suspension, notice in writing must be given as soon as possible to the manager of the establishment/occupier, giving the reasons for the suspension of an ECGS operation.

7.3 Suspension at the request of the occupier

Participation in ECGS is voluntary. If an occupier of a registered establishment with approved ECGS advises DAFF in writing that ECGS related export operations will not be carried out for a period, DAFF may suspend the ECGS approval for such period (not exceeding the period specified in the notice) and on such conditions, as DAFF believes fit.

8. Related material

Export Control (Plants and Plant Products) Order 2011
(<http://www.comlaw.gov.au/Details/F2011L02005>)

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 19 of 20

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

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

Export Compliant Goods Storage (ECGS) Policy document

9. Appendix A - Detailed Version History

Date Published	Version	Detail reason for issue or amendments	Author / Document Owner (Program)
15 March 2013	Version	To allow ECGS registered export establishments to have prescribed goods inspected for export compliance at an earlier stage in the supply chain and securely stored in an approved receptacle (storage) for a period of up to 28 days before export.	Plant Export Operations

Reference Guide Export Compliant Goods Storage (ECGS)			
Date Published:	Current Version Number	Document Owner: Rashid Qaisrani	Page Number
22 March 2013	FINAL V1.0	Plant Export Operations Branch	Page 20 of 20