



Australian Government

Department of Agriculture, Fisheries and Forestry

Biosecurity

Work Instruction

Registering establishments and renewing registrations for the preparation of prescribed goods – plant exports

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1. Purpose

Work instructions for inspecting and registering establishments or renewing registration for preparing and presenting prescribed goods.

Preparation and inspection must take place in a registered establishment.

Applies to persons who are authorised officers under Section 20 of the *Export Control Act 1982*.

2. Occupational health and safety

As an authorised officer you must not enter a site unless you are confident it is safe and you are aware of Occupational Health and Safety (OH&S) hazards.

Important! All sites are different and you must always comply with DAFF OH&S policies and relevant state or territory OH&S legislation.

Refer to volume 16 in the Plant Export Operations Manual (PEOM) for more details.

3. Activities

3.1 Receiving Registration applications

3.1.1 Be aware that the occupier of the establishment must apply in writing for:

- new registrations
- renewal of registrations
- alterations to existing registered establishments.

Applications must be lodged on an approved form with the local DAFF Biosecurity office.

3.1.2 Confirm receipt of the application on the form.

3.1.3 Establish if there is a file for the establishment. If there is, access it to obtain any relevant information. Otherwise create a new file.

Note: All documentation must be retained on official files.

3.2 Checking applications for registration

3.2.1 Check the approved form has been filled out correctly and that all associated documentation is attached. This includes:

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- name and business address of the occupier
- if a corporation—name and address of the person, or each person, managing or controlling establishment operations
- if a partnership—name and address of partners
- plans or diagrams must give the general structural and operational layout of the establishment
- plans must be sufficiently detailed to allow evaluation of the establishment and must include:
 - a locality map showing the site in relation to the local area
 - a site plan showing all salient features of the site and adjoining sites including establishment location
 - a floor plan of processing areas, showing all permanent fixtures and equipment layout
 - a product flow chart, and main features of product.

3.2.2 If the application is incomplete, contact the establishment and request the missing / additional information. Do not take further action until you receive the missing / additional information and the application is complete.

3.2.3 Establish from files if the establishment is currently subject to

- suspension
- withdrawal of services due to outstanding debt or non-conformities
- investigation or litigation.

If it appears that it is not appropriate to proceed with an inspection, consult with the Regional Program Manager.

3.2.4 Establish the functions to be undertaken and the type of establishment, for example, a bulk terminal, a bagging plant, fresh fruit or vegetable packer, a freight forwarder, an exporter's premise or treatment facility.

Note: The establishment must meet requirements appropriate for the purpose. You may need to be read this Work Instruction in conjunction with requirements for specific operations such as protocols for fresh produce export.

3.3 Inspecting an establishment

3.3.1 Organise a mutually convenient time to meet with the occupier for an inspection.

3.3.2 Assemble the necessary documents and equipment—Establishment inspection equipment list (volume 7, PEOM).

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- 3.3.3 Note that there are different hygiene requirements for goods for consumption, human or animal compared with goods not for consumption *Export Control (Plants and Plant Products) Order 2011 (ECPPO) Schedule 3, subclause 6.5.*
- 3.3.4 Ensure all registered establishments, regardless of type, comply with the requirements under the ECPPO Part 3.
- 3.3.5 Determine areas of the establishment's operation/production that the operator may need to halt to enable safe inspection.
- 3.3.6 Take samples of live pests or contaminants if these are present as they may pose an unacceptable risk to the prescribed goods noting the following:
- if the risk is not acceptable, the establishment cannot pass inspection
 - the occupier will have to pay costs if they want specimens identified, otherwise retain specimens for at least three months.
- 3.3.7 Systematically conduct a visual inspection of the outside and surrounds, following the flow path as follows:
- ask the occupier questions, seek demonstrations, ask for explanations
 - examine and verify a range of procedures such as those relating to pest control and hygiene records
 - be alert to signs of pests such as rodent droppings, evidence of insects.
- 3.3.8 Determine if the structure and layout of the establishment is consistent with plans and flow charts previously provided. Take particular note of any alterations, extensions and rearrangements that may have required prior to approval.
- 3.3.9 Hygiene and Pest control
- 3.3.9.1 Check that there is a defined program for hygiene and pest control appropriate for the product by:
- inspecting for pests including, insects, vermin and weeds
 - sighting a documented program and records.
- Note:** Some rodent bait stations can support insect infestation.
- 3.3.9.2 Check that:
- establishments preparing prescribed goods have a daily and weekly waste removal routine
 - establishments operating on a seasonal or ad hoc basis have cleaned the establishment, plant and equipment prior to intake.
- 3.3.9.3 Records
- Examine the following records:

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- cleaning
- pest control measures
- receivals
- loading/despatch.

Note: There may be additional records required e.g. for fresh fruit and vegetables to certain protocol countries.

- Check that hygiene control records:
 - contain daily and weekly activities as well as non-routine cleaning that present a risk to prescribed goods such as insects
 - include areas or system components involved and dates in which the work was undertaken
 - comply with the requirement that records must be retained for at least two years.
- Pest control records should contain the following details regarding areas and product treated:
 - location of areas or product treated
 - dates treated
 - treatments used including chemical, fumigant or other materials.

3.3.10 Note that goods may originate from different registered establishments and can be repacked and/or consolidated into lots, at the establishment being inspected. Check that the establishment has records of:

- the packing dates
- the establishments at which the goods were originally packed
- records of transfer certificates where relevant (e.g. horticulture exports)
- records must be kept for at least two years.

3.3.11 General design and construction

a) Determine if the establishment is designed and constructed to allow all operations to be carried out efficiently, effectively and hygienically.

Note: A small number of non-conformities do not necessarily mean that whole design and construction is unsuitable for the purpose.

b) Check that there is adequate ventilation where fumigation or chemical treatments are carried out.

c) Inspect the floors, walls and surrounding areas in the product handling areas to ensure that they can be adequately cleaned.

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- d) Examine beams, rafters, storage racks and similar areas for any build up of contamination.
- e) Check the construction and design allows for effective cleaning.

3.3.12 Inspect for harbourage sites for pests and diseases, including:

- Storage areas
- poor building design
- pallets against walls
- old machinery stored on site
- inadequately designed waste handling.

3.3.13 Check that:

- the design and construction of the establishment including surrounds minimise the possibility of contamination of the prescribed goods.
- roadways and surrounding areas are not likely generate mud, dust, weed seeds or plant and animal material that can cause contamination
- areas are clear of weeds, vegetation, unused machinery, rubbish or any other sites that can harbour pests and disease.

3.3.14 Other operations carried out in the establishment such as handling other products or mechanics workshops must not lead to contamination of the prescribed goods.

3.3.15 Examine plant and equipment to determine if it can be effectively cleaned keeping in mind that cleaning is achieved in a number of ways depending on the product. Ask the operator how they clean the plant and equipment.

3.3.16 Inspect hand washing and toilet facilities to ensure they are clean, kept in a sanitary condition and include suitable hand drying facilities.

3.3.17 Check that there is adequate provision for waste disposal by:

- visually inspecting for waste
- asking the operator how they handle waste removal
- checking their records (that might include invoices).

Note: Waste can include but is not limited to culled product, dust, screenings, damaged product, tops, leaves, soil, packaging materials, liquids, sweepings and rejected product.

3.3.18 Treatment equipment

Ask the operator to demonstrate how their equipment for fumigation and/or treatment of prescribed goods conforms to construction, testing

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maintenance and operation as required by local government, State, Territory and Commonwealth regulations by:

- describing what they do
- providing verification through presenting documents to support their claims.

3.3.19 Check that inspection areas and facilities are appropriate for the purpose including the following:

- a. The area is safe and designated as an inspection area. Delineation with yellow lines or safety bars may be necessary. The area must not be exposed to the operation of machinery or other safety hazards.
- b. Inspection benches:
 - are clean
 - have a solid surface with a white top—if not a white top, a suitable white tray or a material to provide a white background against which to examine specimens
 - may need to be purpose built e.g. sloped and funnelled for potatoes or onions, flat with a power source and grain return mechanism for electronic sieving
 - are 900 mm high and 2 metres wide as a general guide.
- c. The lighting over the inspection bench is 600 lux as per the standard requirement. Usually 2 X 40 watt fluorescent tubes about a metre over the bench are sufficient. Test with a light meter if there is any concern that lighting is insufficient.
- d. The availability of equipment for taking samples, general handling of samples and opening/closing packages where this is appropriate for the type product.
- e. There are receptacles for waste that is generated by the inspection process e.g. cut fruit, grain residues or dust from samples.
- f. Bulk product automatic samplers where used are close to the flow path and draw the appropriate sample rate in a representative manner. Automatic samplers are required for establishments that handle 400 tonnes or more per hour.
- g. Where weight is a part of the trade description, check that accurate scales are available.
- h. That a desk, phone and chair are accessible. In some cases, this may not be necessary in the inspection area itself but located in another area.

3.3.20 Check that rodenticides, fumigants, fungicides, insecticides or other toxic substances are stored in such a way that they will not contaminate

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prescribed goods. Containers need to be sound and located away from product.

- 3.3.21 Check that animals including birds and rodents are not present in the establishment, by
- paying particular attention to areas where prescribed goods are prepared
 - confirming that domestic animals such as pets are not permitted in establishments preparing products for consumption
 - looking for signs of contamination and droppings or feathers.

- 3.3.22 Ensure that the establishments handling edible products complies with the applicable State and Territory laws relating to food handling including:
- quality of water used in processing
 - personal hygiene
 - effluent disposal.

Ask the operator to demonstrate how they meet these requirements. Refer (and record) critical noncompliance to appropriate authorities.

- 3.3.23 Check that treatment facilities for mandatory treatments meet requirements specified by importing countries – refer to relevant Workplan or protocol document. Where requirements are not specified by an importing country, Australian standards will apply. Check against the relevant standards for compliance e.g. DAFF Methyl Bromide Fumigation Standard.

- 3.3.24 Hay export and straw establishments are required to meet export standards for hay and straw. (Refer to PEOM for Standards and Work Instructions relating to hay and straw exports).

- details of the person who supplied the hay or straw
- date on which it was prepared for export
- date on which samples were drawn for testing
- means of identifying the group of bales from which the sample was drawn
- sampling method used as listed in the hay and export standard
- details of the laboratory that tested the hay or straw
- test method used as listed in the hay and straw export standard
- test results
- details of the person who took delivery of the hay or straw after it had been prepared for export (if not the exporter or the person who supplied it)
- details of the exporter where this is known.

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3.4 Endorsing/rejecting the registration

- 3.4.1 Complete the approved establishment inspection record. Determine from this record if the establishment passes or fails.
- 3.4.2 Record if the occupier agrees to rectify faults within an agreed time frame. Decide whether to recommend registration or re-registration, if the faults are not critical i.e. do not present an unacceptable risk to prescribed goods. Be aware that a follow-up inspection will be required to ensure faults have been rectified.
- 3.4.3 Authorised officer's post-inspection recommendations;
- If recommending a new registration or re-registration, endorse the approved form and forward it to the Regional Program Manager.
 - If not recommending a new registration or re-registration
 - record your rejection decision on approved inspection form
 - advise the occupier that the establishment cannot be registered at this time and explain why
 - provide the report to the Regional Program Manager.
- Note:** The occupiers can reapply to register when they believe they have met all requirements.
- 3.4.4 Ensure that all documents have been completed correctly. Ensure all documents including all attachments (such as floor plans and maps) are provided to the Regional Program Manager.
- 3.4.5 The Regional Program Manager must refer all new applications to DAFF Compliance.

3.5 Record keeping

- 3.5.1 Keep accurate records for a period of 6 years in the official files.
- 3.5.2 Ensure records are easily accessible for when you are doing business with the establishment.
- 3.5.3 Place the following on the TRIM file:
- a copy of the applications, correspondence, approved forms and all attachments including inspection records
 - OH&S checklist.

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