



GUIDELINE

Quality System Recognition of highly processed plant products for export

Direction to external authorised officers

This document is instructional material for the Department of Agriculture and Water Resources (the department) under its Practice Statement Framework. All staff must comply with it

Summary of main points

This document outlines:

- the policy and process for applying for quality system recognition
 - the policy and process for maintaining quality system recognition
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Purpose of this document

This document details the policy and processes for recognising quality systems, in export registered establishments (establishments), for highly processed and securely packaged plants and plant products (products) for export. The department may recognise establishments with independently audited quality systems, which meet both departmental and importing country's phytosanitary requirements, as satisfying requirements for certification of processed products.

Definitions

The following table defines terms used in this document.

Term	Definition
Australian export regulation framework	The <i>Export Control Act 1982</i> and its subordinate legislation.
Client	The exporter, exporter's representative or person responsible for plants and plant products for export.
Highly processed products	Products that have been processed in a way that removes or destroys all pests and contaminants. Once a product has been highly processed it is considered to have a low phytosanitary risk.
Inspection Authorised Officer (AO)	An officer who has been accredited by the department to perform the role of export verification inspection.
Quality System	An independently audited system that includes sampling and inspection procedures to control the quality of products.
Quality System Recognition (QSR)	The approval of an establishment that has an audited quality system that meets departmental and importing country phytosanitary requirements.
Securely packaged	Sealed packaging that reduces the likelihood of infestation or contamination of the product. This can include nitrogen flushed and vacuum sealed packaging.
Export Registered Establishment (ERE)	An export registered establishment is a premise that produces edible and /or inedible prescribed goods for export.

Quality System Recognition Policy

The department has committed to streamlining regulatory activities for industry where appropriate. The Quality System Recognition (QSR) policy was designed in line with the department's deregulation agenda. This policy allows the department to recognise establishments with independently audited quality systems, which meet both departmental and importing country's phytosanitary requirements, as satisfying requirements for export certification of products.

The QSR policy allows for the recognition of audited quality systems which will significantly streamline phytosanitary approval. QSR is designed for goods that are highly processed where the processing of the product mitigates phytosanitary risks, and that are securely packaged. Each registered establishment must have a quality system/s that includes sampling and inspection procedures that meet departmental and importing country phytosanitary requirements. The quality system must be able to demonstrate a nil tolerance for pests and contaminants. If an establishment has a quality system, which is audited by an independently certified quality system auditor, the department may determine, via application and subsequent audit, that the establishment is meeting the requirements for export.

Under QSR, an Authorised Officer (AO) is not required to undertake the sampling and inspection of the product during or before loading. The AO is only required to conduct a verification inspection before the goods are loaded into the container. This verification involves the AO confirming the consignment matches the documentation, for example that the number of bags of product matches the number on the Export Compliance Record, and that product listed on the request for permit is the product for export. The AO must also ensure that the packaging is secure/sealable and that the individual packages/bags do not exceed 1000 litres or equivalent in size (approx 1000kg). This streamlines inspection processes for exporters as the AO does not need to be present apart from the verification inspection.

QSR approved establishments may also choose to utilise the storage allowances written into the QSR guideline and store packaged goods under the quality system for up to two years prior to export. These goods are able to be verified as export compliant as long as they are exported before the two year storage period has expired.

Legislative framework

The following list outlines the legislation that applies to QSR:

- *Export Control Act 1982*
- *Export Control (Orders) Regulations 1982*
- *Export Control (Prescribed Goods - General) Orders 2005*
- *Export Control (Plant and Plant Products) Order 2011*
- *Export Control (Fees) Orders 2001.*

Roles and responsibilities

The following table outlines the roles and responsibilities undertaken in this guideline.

Role	Responsibility
Client	<ul style="list-style-type: none"> Applying to the department for QSR using the Reference: <i>Application for Approval of Quality System Recognition</i>. Maintaining the quality system/s including appropriate records in their establishment. Maintaining valid Export Registered Establishment registration and upholding an ERE audit score of 80% or higher. Notifying the department of any intent to make changes to processing methods or quality system/s prior to making the changes.
Department of Agriculture and Water Resources Auditor	<ul style="list-style-type: none"> Auditing establishments that have applied for Quality System Recognition to approve that the establishment's audited quality system/s meet the phytosanitary requirements for export of highly processed products. Undertaking periodic audits of establishments.
Inspection AO	<ul style="list-style-type: none"> Sighting the consignment for export. Checking the consignment matches the documentation (Notice of Intention, Request for Permit and Export Compliance Record). Checking the packaging is secure. Passing the consignment as export compliant.
Department of Agriculture and Water Resources Plant Export Operations, Canberra	<ul style="list-style-type: none"> Assessing applications for Quality System Recognition and notifying clients of approval or otherwise. Coordinating initial audit of the establishments.
Audit Service Group	<ul style="list-style-type: none"> Arranging initial audit of the establishments. Arranging the site visit and audit of the establishment. Write up audit reports.

Pre-requisites for quality system recognition

Registration

The establishment must be registered with the department as an export registered establishment.

Product

Only highly processed products are eligible for QSR. Processing must mitigate phytosanitary risks and products must be presented for export in secure packaging.

Quality system

Each establishment must have an independently audited quality system/s that includes sampling and inspection procedures that meet departmental and importing country phytosanitary requirements. The quality system must be able to demonstrate a nil tolerance for pests and contaminants.

The quality system and associated independent audits must be fully documented and made available to the department during the assessment and audit process and upon request. An independent auditor for quality systems will be a professional, third-party auditor, external to the client.

Examples of quality systems include International Organisation for Standardisation (ISO) standards, food safety standards, supermarket quality assurance standards and Hazard Analysis and Critical Control Points (HACCP) system certification.

Equipment use and maintenance

Any equipment used in processing the product must be maintained to prevent infestation and contamination. All maintenance must be documented with records maintained for a period of two years. A visual inspection of equipment and maintenance records may be required for audit purposes.

Documented systems

All systems need to be documented and must be version controlled.

Application requirements

The following information must be provided with the application. Information must be on a company letterhead, dated for version control and signed by a person listed in management and control on the export registration:

Layout of the establishment

- A plan of the establishment showing location of major items including equipment, storage areas (pre and post processing), receipt and load-out areas.
- Product flow paths must be clearly indicated and Common conveying equipment and cross-over of product lines must be identified.

Details of the products

- A list of the products covered by the QSR.
- Details of the processing that will remove or destroy pests or contaminants that may have existed in the raw material.
- Details of how the processing limits future contamination and phytosanitary risks in each product.

Packaging and storage

- Description of the packaging material used, including details on the type, weight and how it is secure from infestation of pests and contamination.
- Photo of the packaging material used.
- Details of the storage facilities and how these areas are secured from ingress of rodents and other pests.

Quality systems

- A list of the current quality systems in place, including the last assessment date, and certificate/s of currency.
- The audit schedule of each system.

- Description of how the quality systems meet or exceed the phytosanitary requirements for export in the establishment.
- The audit reports from the last two (2) years for each quality system.

Organisational chart

- An organisational chart showing key positions/areas of responsibility and occupants involved in the establishment including staff that have been nominated as substitutes for these key positions.

Quality standards that are audited

List of the standards that are included in each quality system that would apply to the products under the QSR with an explanation on how the standards meet Australia's phytosanitary obligations.

Standards should include, but are not limited to:

- food quality and safety
- equipment hygiene maintenance and inspection
- sampling procedure and product inspection
- flowpath hygiene and inspection
- storage hygiene, pest control and inspection
- sampling procedure
- sampling rate in Litres per Tonne at the rate stated in the *Export Control (Plant and Plant Products) Order 2011*.

Application process

The following table outlines the process for applying for quality system recognition.

Stage	What happens	Responsible party
1.	The application is completed.	Client

Stage	What happens	Responsible party						
2.	<p>The application is reviewed to ensure all required information is present.</p> <table border="1"> <thead> <tr> <th>When the application is...</th> <th>Then...</th> </tr> </thead> <tbody> <tr> <td>satisfactory.</td> <td> <p>a letter of conditional approval is sent to the client detailing the systems approved under QSR, and the establishment's allocated QSR number.</p> <p>NOTE: The QSR establishment may operate with a conditional approval until either approved or revoked.</p> </td> </tr> <tr> <td>incomplete or does not meet the pre-requisite requirements.</td> <td> <p>do not approve it.</p> <p>Return applications that are not approved to the establishment/applicant with an explanation of why approval was not given.</p> </td> </tr> </tbody> </table>	When the application is...	Then...	satisfactory.	<p>a letter of conditional approval is sent to the client detailing the systems approved under QSR, and the establishment's allocated QSR number.</p> <p>NOTE: The QSR establishment may operate with a conditional approval until either approved or revoked.</p>	incomplete or does not meet the pre-requisite requirements.	<p>do not approve it.</p> <p>Return applications that are not approved to the establishment/applicant with an explanation of why approval was not given.</p>	Grain and Seed Export Program
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5.	The facilities QSR approval is recorded in the Grain Export Listed Entities on the Plant Export Operations team site.	Business Systems Program						
6.	A combined Export Registered Establishment (ERE) and QSR audit of the establishment is arranged.	Audit Services Group						
7.	A site visit and audit of the establishment is conducted within 6 months of conditional approval of the facility.	Audit Services Group						
8.	The ERE audit outcome is provided to the Grain and Seed Export Program.	Audit Services Group						

Stage	What happens	Responsible party						
9.	<p>The ERE audit outcome is reviewed.</p> <table border="1"> <thead> <tr> <th>If the establishment...</th> <th>Then...</th> </tr> </thead> <tbody> <tr> <td>passes the audit, including QSR requirements.</td> <td>the QSR approval will be confirmed.</td> </tr> <tr> <td>fails the audit.</td> <td>the QSR is not approved. The applicant is provided with a letter providing reasons why approval was not given.</td> </tr> </tbody> </table> <p>The department retains the right to revoke approval for an establishment's QSR at any time, in line with this policy.</p>	If the establishment...	Then...	passes the audit, including QSR requirements.	the QSR approval will be confirmed.	fails the audit.	the QSR is not approved. The applicant is provided with a letter providing reasons why approval was not given.	Grain and Seed Export Program
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fails the audit.	the QSR is not approved. The applicant is provided with a letter providing reasons why approval was not given.							
10.	The QSR approval is recorded as a Registered Operation for the Registered Establishment on the ER database, which in turn will be printed on the Certificate of Registration.	Business Systems Program						

Maintaining quality system recognition policy

Documented inventory system

The establishment must maintain records and traceability for all receivables, treatments, load out and operational processes through the facility for a period of two years. There must be a defined identity preservation system in place for all products.

Routine sanitation and treatment details

Records of routine cleaning, sanitation, waste removal and pest control measures must be documented and maintained for a period of two years. If the product has been treated, the establishment must maintain records of treatment certificates. The treatment certificates must meet the requirements as per the Work Instruction: *Validating supporting documents for plant exports*.

Sampling system

The standards or systems implemented by the establishment must include a sampling and inspection process.

The sampling collection system must:

- deliver a representative sample at the rate of at least 2.25L per 33.33T of product, and
- be audited, and
- if automated, have calibration records.

Packaging and storage

The product must be packaged in and/or secured in such a manner ensuring the phytosanitary status of the commodity is maintained.

Individual packaging (sealed product bags, boxes etc) must not exceed 1000 litres or equivalent (approx. 1000kg) in size.

Time from product packaging to export must not exceed two years.

Flow path

The quality system audit, conducted by a 3rd party auditor, must involve an inspection of the product flow path consistent with the requirements in the Plant Export Operations Manual which can be found [here](#). This requirement means an AO will not need to conduct a separate flow path inspection.

Authorised Officer

The AO must be appointed for the PGG3001:1 Inspection of prescribed grain and plant products: packaged.

An AO will be required to complete an Export Compliance Record at the time of loading for export. The allocated QSR number of the establishment must be entered into the comments field of this document.

Non compliances

The Secretary, or a delegate of the Secretary, has authority to suspend or revoke approval of QSR under Export Legislation. A departmental auditor may recommend to the delegate to:

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

Participation in QSR is voluntary. If an occupier of an establishment with approved QSR advises the department in writing that QSR related export operations will not be carried out for a period of time, the department may suspend the QSR approval for such period.

A QSR approval will be incorporated as part of the documentation for the establishment approval and will be audited at the same time and frequency as the export registration periodic audit.

When a QSR approval is revoked or suspended the establishment may be able to continue to export but will require the full AO inspection procedure to be followed.

Audit of Plant Export Registered Establishment

Once the initial audit has been undertaken, periodic (annual) ERE audits, with a QSR audit component, will be used to monitor compliance. The establishment must maintain an ERE audit score of 80% or higher in order to maintain QSR status. Failure to maintain an ERE audit score of 80% will cause a review of QSR approval.

The client will be required to provide a copy of independent quality system audit results to the department.

The following table outlines the process for the initial ERE audit of an establishment that is conditionally approved for QSR:

Stage	What happens	Responsible Party						
1.	<p>Conduct an ERE audit including QSR audit component.</p> <table border="1"> <thead> <tr> <th>If...</th> <th>Then...</th> </tr> </thead> <tbody> <tr> <td>the establishment's periodic ERE audit falls <u>within six months</u> of the conditional approval letter.</td> <td>the audit schedule will proceed as normal.</td> </tr> <tr> <td>the establishment's periodic ERE audit falls <u>outside six months</u> from the date of the conditional approval letter.</td> <td>the audit will be rescheduled to accommodate the QSR audit.</td> </tr> </tbody> </table>	If...	Then...	the establishment's periodic ERE audit falls <u>within six months</u> of the conditional approval letter.	the audit schedule will proceed as normal.	the establishment's periodic ERE audit falls <u>outside six months</u> from the date of the conditional approval letter.	the audit will be rescheduled to accommodate the QSR audit.	Department of Agriculture and Water Resources Auditor
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2.	<p>Provide information to the department immediately on any changes to the quality system or operations of the establishment that may impact on the phytosanitary status of the commodity.</p> <p>The ERE audit will include an assessment of QSR requirements as outlined in the QSR guideline.</p>	Client						
3.	<p>Confirm the quality programs are in place and valid by sighting documents and results from the quality program audits and viewing the systems in operation.</p> <p>If the establishment passes the ERE audit, including QSR requirements, the establishment's QSR approval will be confirmed.</p>	Department of Agriculture and Water Resources Auditor						

The following table outlines the process for a periodic audit of an establishment with QSR:

Stage	What happens	Responsible Party
1.	Conduct an entry meeting to discuss scope of periodic audit and QSR requirements.	Department of Agriculture and Water Resources Auditor
2.	<p>Provide documentation and records to the departmental auditor in relation to hygiene, pest control, waste management, maintenance systems and product/consignment traceability.</p> <p>Provide evidence of compliance with quality system such as audit results, certificates and audit schedule.</p> <p>May also provide any changes to the quality system or operations of the establishment that may impact on the phytosanitary status of the product at that time.</p>	Client
3.	Confirm the quality programs are in place and valid by sighting documents and results from the quality program audits and viewing the systems in operation.	Department of Agriculture and Water Resources Auditor

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Failure to maintain required standard

Where a departmental auditor has reasonable grounds to believe that requirements according to legislation are not being met, the circumstances will be referred to the Delegate of the Secretary of the department, which may lead to suspension of QSR approval.

The department will determine the suspension period based on the information provided by the auditor.

Should the Delegate decide to suspend the registration of an establishment, the representative of the establishment will receive written notice of the suspension.

If reinstated, the establishment will be audited within three months or during the following quarter.

Failure of the follow-up audit may result in the revocation of registration by the Delegate.

Record keeping

Departmental officers must keep official files in accordance with the department's record keeping policy. All documentation must be version controlled.

Related material

The following related material is available on the [Plant Export Operations Manual \(PEOM\)](#):

Work Instruction: *Validating supporting documents for plant exports*

Reference: *Application for Approval of Quality System Recognition.*

Reference: *Client application checklist for Quality System Recognition*

Work Instruction: *Inspection of prescribed grain and plant products - Attachment 5: Quality System Recognition*

Document information

The following table contains administrative metadata.

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Version history

The following table details the published date and amendment details for this document.

Version	Date	Amendment details
1.0	06/07/2015	First publication.
2.0	04/11/2016	Changes to policy.