



Plant Export Operations Branch

Work Instruction

Inspection of raw baled cotton RBC3001

- Raw baled cotton
- Mote baled cotton
- Cotton modules

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1. Work effectively in an export environment

1.1 Purpose

This work instruction relates to the export inspection of prescribed goods for government certification purposes and applies to you as a Department of Agriculture Authorised Officer (AO). This work instruction and the relevant attachments explain how to conduct an export inspection for cotton commodities.

In this work instruction, 'client' means the exporter, exporter's representative or person responsible for the prescribed goods.

Additional detail, including why you do certain tasks, and any reference to the Secretary or Secretary's delegate is further explained in the Plant Export Operations Manual (PEOM).

For any guidance on any issues that are not satisfied by this work instruction or the PEOM you must refer to the Department Plant Export Manager in your local area. As an AO you must follow and comply with export legislation and the APS Values and Code of Conduct at all times. Communication, conflict management and defensible decision-making are integral to your role as an AO.

1.2 Commodities

The commodities covered include:

- Raw baled cotton
- Mote baled cotton
- Cotton modules / unprocessed cotton

1.3 Definitions

- Cotton modules - The compressed cotton bales; not yet ginned or processed.
- Gin motes – Small, broken or immature seeds with attached fibres. The gin removes the motes at a different stage from the mature whole seeds.
- Lint - The cotton fibre obtained by the ginning process once the cotton seed, leaves and bol casings have been removed.
- Mote cotton - A by-product of the ginned cotton; small, broken or immature seeds with attached fibres.
- Raw cotton - Cotton fibres that are removed from the cotton seed by the gin. This is the main product from the gin. The by-products of the gin are cotton seed and mote cotton.
- Reginned cotton - Reginned cotton is cotton that has passed through the ginning process more than once, and has also already been baled. It may go

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through the ginning again for additional cleaning, blending or the removal of foreign material.

- Seed cotton - Unginned, picked cotton.
- Unprocessed cotton – see 'Cotton modules'

1.4 Work Health and Safety

You must not enter a site unless you are confident it is safe and are aware of Work Health and Safety (WH&S) hazards.

All sites are different and you must comply with Department WH&S policies and relevant national, state and/or territory WH&S policies.

Refer to Volume 16 in the PEOM for more details.

2. Conduct pre-inspection tasks

- Receive a request for an inspection of raw baled cotton consignment.
- Check if there is a case in Manual of Importing Country Requirements (MICO R) Plants for each product.
 - If there is a not a case in MICO R Plants you cannot continue with the inspection.
 - Advise the client that they need to obtain the import requirements from the importing country authority and email these to the MICO R Plants administrator. The import requirements will need to be assessed and MICO R Plants updated before the consignment can be inspected.
- Check the MICO R Plants case for each product to see if the importing country authority requires an import permit.
 - If an import permit is required and has not been provided you cannot continue with the inspection.
 - Advise the client that they need to present an import permit before the consignment can be inspected.
- If an import permit is required and has been provided at the time of inspection you need to check it is valid as per the Work Instruction: Validating supporting documents for plant exports.
 - If the import permit is not valid you cannot continue with the inspection.
 - Advise the client that they need to obtain a valid import permit before the consignment can be inspected.
- Check the import requirements on the import permit match the MICO R Plants case for each product.

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- If the import requirements do not match you cannot continue with the inspection.
- Advise the client that they need to email the import permit to the MICO R Plants administrator. The import permit will be assessed and MICO R Plants updated before the consignment can be inspected.

Note: If you are a departmental inspection AO then you do not have to complete the following step as this has been done for you by the appointment AO.

If you are an external inspection AO:

- Check what form the NOI must be presented in as per the Guideline: *Issuance of certification for plant exports*.
 - If the client has not presented the correct form of NOI you cannot continue with the inspection.
 - Advise the client that they must present the correct form of NOI before the consignment can be inspected.
- If the NOI is a Request for Permit (RFP) check that it is at initial (INIT) or final (FINL) status.
 - If the RFP is not at INIT or FINL status you cannot continue with the inspection.
 - Advise the client that they must present the RFP in the correct status before the consignment can be inspected.
- If the NOI is an EX28 check that it has been completed correctly as per the Reference: *Completion of a Notice of Intention (EX28) User Guide*.
 - If the EX28 has not been completed correctly you cannot continue with the inspection.
 - Advise the client that they must present a correctly completed EX28 before the consignment can be inspected.
- If the NOI is an EX28 check that the export registered establishment (ERE) on the NOI is currently registered by checking the Certificate of Registration displayed at the ERE or by checking with the department's regional office.
 - If the ERE is not currently registered you cannot continue with the inspection.
 - Advise the client that they must use an ERE to export.
- Check that the ERE has one or more of the plant export registered operations as per the Reference: *Registered operation codes for plant export registered establishments*.
 - If the ERE does not have one or more plant export registered operations you cannot continue with the inspection.

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- Advise the client that the ERE must be registered for plant exports before the consignment can be inspected.
- Check whether the client needs to complete any manual certification as per the MICoR Plants case, that they have used the correct template and that the template has been completed correctly as per the:
 - Reference: *Completion of a Phytosanitary Certificate (E16) User Guide*
 - Reference: *Completion of a Declaration and Certificate as to Condition (EX188) User Guide*
 - Reference: *Completion of a Certification as to Condition (EX46A) User Guide*
 - Reference: *Completion of a Phytosanitary Certificate for Re-Export (EX25) User Guide*
 - Reference: *Completion of a Radioactivity Statement User Guide.*
 - If these certificates have not been completed correctly you cannot continue with the inspection.
 - Advise the client that they need to complete the certificate correctly before the consignment can be inspected.

Note: The following steps apply to both departmental and external inspection AOs.

- Check that you have received all supporting documents required prior to inspection as per the Reference: *Plant export documents and treatments checklists* and the MICoR Plants case/s.
 - If all the supporting documents have not been received you cannot continue with the inspection.
 - Advise the client that they need to obtain the supporting documents before the consignment can be inspected.
- Check that the supporting documents you have received are valid as per the Work Instruction: *Validating supporting documents for plant exports.*
 - If any of the supporting documents are not valid you cannot continue with the inspection.
 - Advise the client that they need to obtain valid supporting documents before the consignment can be inspected.
- Before commencing the inspection you must have:
 - an Export Compliance Record
 - inspection equipment that it is fit for purpose
 - any instructional or reference material you may require
- Check site specific WH&S requirements and collect your personal protective equipment

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3. Conduct flowpath inspection tasks

3.1 Inspect entire flowpath

- To ensure it is **fit-for-purpose** by:
 - Ensuring that any live pests cannot cross-infest the goods
 - Ensuring that any vermin and/or their waste cannot cross-contaminate the goods
 - Ensuring any contaminants cannot cross-contaminate the goods
 - Ensuring any tolerances specified by the importing country are adhered to
- This inspection must be undertaken each time you arrive onsite to start an inspection or as approved in the PEOM

Inspection area

- You must be satisfied that the point of inspection is fit-for-purpose as outlined above and:
 - allows for the safe and effective inspection of prescribed goods
 - allows you to inspect unimpaired both visually, physically and environmentally

Commodity flowpath

- You must be satisfied that the commodity flowpath is fit for purpose by:
 - Inspecting the commodity source/storage area
 - Inspecting the commodity conveyance systems

Pass the flowpath

- Pass the flowpath if you are satisfied that all relevant tolerance levels have been met
- Record passed flowpath and the time it was passed on the Export Compliance Record

Fail the flowpath

- If you identify an issue that **will be rectified whilst you are onsite** you must:
 - Record failed flowpath and the time it was failed on the Export Compliance Record
 - Inform the client of the issue
 - Note that the client is responsible for choice of treatment

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- Record how and when the flowpath issue was rectified on the Export Compliance Record
- Inspect the flowpath as per above instructions
- Pass/Fail the flowpath as per above instructions
- No loading is to commence unless the flow path has been passed
- If you identify an issue that **will NOT be rectified whilst you are onsite** you must:
 - Record failed flowpath and the time it was failed on the Export Compliance Record
 - Inform the client of the issue
 - Note that the client is responsible for choice of treatment
- Give client a **copy** of the completed Export Compliance Record
- Send the Department a **copy** of completed Export Compliance Record and any supporting documentation
- Retain the **original** completed Export Compliance Record and any supporting documentation for a minimum of 2 years for auditing purposes

Reinspect the flowpath

- The client must advise you when the flowpath issue has been rectified and is ready for reinspection
- Conduct your inspection of the **entire flowpath** as described above

3.2 Inspect empty container

If the empty container is present:

- You must ensure that the condition of the empty container has not changed since the container approval was issued by looking for:
 - any structural damage that may allow cross-infestation of the goods
 - any pests, residues or contaminants that may infest or contaminate the goods
- if seal is intact you only need to check the outside of the container
- Check the inspection sticker:
 - to ensure the container is suitable to be loaded with consumable or non-consumable goods
 - is within 90 days of inspection

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- has not been removed or obliterated
- If the condition has changed for any of the above reasons you must cancel the container approval by:
 - notifying the client of the cancellation of the container approval
 - complete a new Container Approval Record noting in the remarks field the reason for cancellation
 - remove and destroy any inspection sticker on the container
- The empty container must have another container approval issued before the inspection of the goods can commence or another approved container is provided to replace it.

4. Conduct goods inspection tasks

4.1 Assess the consignment

- Liaise with the client to:
 - identify the lot/consignment to be inspected
 - Confirm the goods presented comply with the information on the Notice of Intention
 - ensure the lot/consignment is accessible for sampling
- Ensure all trade description requirements are met (if present)
- If the goods information **is not** compliant with the Notice of Intention and/or the trade description requirements are **not** met:
 - And the issue **will be rectified whilst you are onsite** you must:
 - record failure issue on the Export Compliance Record
 - inform client of the issue
 - record how and when the issue was rectified on the Export Compliance Record
 - And the issue will **NOT be rectified whilst you are onsite** you must:
 - record failure issue on the Export Compliance Record
 - inform client of the issue
 - Give client a **copy** of the completed Export Compliance Record
 - Send the Department a **copy** of completed Export Compliance Record and any supporting documentation
 - Retain the **original** completed Export Compliance Record and any supporting documentation for auditing purposes for 2 years
- If the entire consignment is present:
 - identify lots

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- determine the size of the lot/s
 - the maximum size of a lot must not be greater than 116 bales or not more than the amount which can be loaded into a 40 foot shipping container
- record the number of bales forming each lot on the Export Compliance Record

4.2 Inspect the consignment

4.2.1 Drawing of Samples

Presented goods can only be sampled and inspected **before** the loading of containers or vessels (or immediately prior to compaction in the case of cotton modules)

- For raw baled cotton and mote cotton, draw samples at the rate of 6 bales per lot
- For mote cotton, draw one hand grab sample from each of the 6 sampled bales
- For cotton modules / unprocessed cotton, draw two grab samples from each of three different modules per lot (6 grab samples in total per lot) – one from the centre of the module and one from the outside of the module (next to wrapping). Each grab sample must weigh at least 50g
- Draw samples randomly from across the entire lot/consignment

4.2.2 Inspecting Samples

- Inspect all samples using suitable equipment
- Examine the samples for live pests, vermin and contaminants in accordance with the following tolerances:
 - Nil tolerance for live pest infestations unless specified otherwise by the Secretary
 - Nil tolerance for vermin including rodents and their waste unless specified otherwise by the Secretary
 - Tolerance levels for contaminants may be specified in the PEOM, by the importing country or by the Secretary
- If there is any other contaminating material where no tolerance level is stipulated you:
 - do not reject for these contaminants
 - must advise the client by recording in the comments section of the Export Compliance Record

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Raw baled cotton

- Inspect the exposed cotton surface of each bale:
 - through tears in the hessian
 - by lifting the top flap of the bale
 - by making a 40 cm cut in the form of a right angle in the hessian

Mote baled cotton

- Inspect the mote cotton surface of each bale
- Inspect samples by breaking apart each grab sample to allow visual inspection of trash / cotton seed / cotton bol / leaf and other plant material, then rub the sample vigorously over a sieve and inspect contents of the pan.
- Walk around the bales in the lot to visually inspect for sources of contamination that may be present on the outside of the bales

Cotton modules / unprocessed cotton

- Inspect samples by breaking apart each grab sample to allow visual inspection of trash / cotton seed / cotton bol / leaf and other plant material, then rub the sample vigorously over a sieve and inspect contents of the pan.
- Walk around all modules in the lot to visually inspect to verify nil soil or other contamination on the exterior of modules, paying particular attention to plastic wrap which has previously been in contact with the ground.

5. Pass the goods after inspection

- Pass the lot/consignment if you are satisfied that all relevant tolerance levels have been met
- Record passed lot/consignment on the Export Compliance Record
- Give client a **copy** of the completed Export Compliance Record
- Send the Department a **copy** of completed Export Compliance Record and any supporting documentation
- Retain the **original** completed Export Compliance Record and any supporting documentation for auditing purposes for 2 years
- You must ensure that the passed goods are segregated and clearly distinguished from goods which are not export compliant

6. Reject the goods after inspection

- Reject the goods based on the relevant tolerances

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- Record rejection of lot/consignment on the Export Compliance Record
- Inform the client of the rejection
 - For live insect infestations you must order a treatment with an insecticide or fumigant by entering in the comments field of the export compliance record
 - You must not **recommend** any particular insecticide or fumigant as the choice of treatment is the responsibility of the client
- Give client a **copy** of the completed Export Compliance Record.
- Send the Department a **copy** of completed Export Compliance Record and any supporting documentation.
- Retain the **original** completed Export Compliance Record and any supporting documentation for auditing purposes for 2 years.
- You must ensure that the rejected goods are segregated and clearly distinguished from goods which have been passed as export compliant.

7. Reinspect the resubmitted goods

Goods rejected for insect infestations

- Goods rejected for insect infestations must be treated with an insecticide or fumigant prior to reinspection.
- Before the reinspection commences you must check what supporting documents are required as per the Reference: *PEOB documents and treatments checklists*.
 - If all the supporting documents have not been received you cannot continue with the reinspection.
 - Advise the client that they need to obtain the supporting documents before the consignment can be reinspected.
- Check that the supporting documents you have received are valid as per the Work Instruction: *Validating supporting documents for plant exports*.
 - If any of the supporting documents are not valid you cannot continue with the reinspection.
 - Advise the client that they need to obtain valid supporting documents before the consignment can be reinspected.

Reinspection of the resubmitted goods

- Reinspect the resubmitted goods by following the above instructions for:
 - Conduct pre-inspection tasks

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- Conduct flowpath inspection tasks
- Conduct goods inspection tasks
- Pass the goods after inspection
- Reject the goods after inspection

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