



# Plant Export Operations Branch

## Work Instruction

### Inspection of hay and straw HAS3001

- Bales, inline and end-point
- Loose hay/straw, inline
- Bagged chaff, end-point

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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 Department of Agriculture Authorised Officers (AOs). This work instruction and the relevant attachments explain how to conduct an export inspection for various plants and plant products.

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

The Plant Export Operations Manual (PEOM) provides additional details including the reasons for doing certain tasks and supporting information and directions approved by the Secretary or Secretary's delegate.

For guidance on issues that are not covered by this work instruction or the PEOM you must refer to the Department of Agriculture Plant Export Manager in your local area.

AOs must follow and comply with export legislation and the APS Code of Conduct and Values at all times. Communication, conflict management and defensible decision-making are integral to the role of an AO.

## 1.2 Commodities

The commodities covered in this work instruction include:

- Hay and straw, compound feed, fermented mixed feed and chaff

## 1.3 Work Health and Safety

Work sites must not be entered unless it is safe, relevant PPE is available and Work Health and Safety (WH&S) hazards have been considered.

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

On entering a site AOs must report to the site office and/or a responsible person and inform them of their attendance on the site and complete any induction procedures.

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Refer to Volume 16 in the PEOM for more details.

## 2. Conduct pre-inspection tasks

- Receive a request for an inspection of a hay and straw 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 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.
  - 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.
- For exports to China, ensure the exporter is on the register of companies approved to export hay to China.

**Note:** If you are a departmental inspection AO than 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:

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- 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 present a correctly completed EX28 before the consignment can be inspected.
- 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.
  - 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*

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- Reference: *Completion of a Ship's Holds Certificate (EX175) 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 the AO must have:
  - an Export Compliance Record (PE100)
  - inspection equipment that is fit for purpose
  - relevant instructional or reference material
- Confirm the sampling and inspection category to be used (Volume 8A table 1)

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- Check site specific WH&S requirements and collect personal protective equipment.

### 3. Conduct flowpath inspection tasks

#### 3.1 Inspect flowpath

- Flowpath inspection must be undertaken prior to loading
- Ensure the flowpath, including the inspection area, is fit for purpose and free of infestible residue by:
  - Inspecting the commodity conveyance systems from the point of sampling to the point of loading
  - Ensuring any live pests cannot cross-infest the goods
  - Ensuring 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

##### Pass the flowpath

- Pass the flowpath if you are satisfied that all relevant tolerance levels have been met (Refer to PEOM Volume 8A, Tables 2 and 3)
- Record result and time the flowpath was passed on the Export Compliance Record

##### Fail the flowpath

- Record result and time the flowpath was failed on the Export Compliance Record
- Inform the client of the issue
  - Note: the client is responsible for choice of treatment
- Loading is not to commence until the flowpath has been passed

##### Reinspect the flowpath

- The client must advise the AO when the flowpath issue has been rectified and is ready for reinspection

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- Record details of how and when the flowpath issue was rectified on the Export Compliance Record
- Where the flowpath has been treated with an insecticide or fumigant it must not be reinspected until after the safety precautions (including exposure or airing periods) specified on the registered label or treatment certificate have been observed
- Conduct an inspection of the **entire flowpath** as described above

### 3.2 Inspect empty container

If the empty container is present:

- Check the tamper evident seal is intact
- Check the Passed Empty Container Sticker is visible on the outside of the container and is:
  - valid
  - within 90 days of inspection
  - not obscured or showing evidence of tampering
- Ensure that the condition of the empty container has not changed since the container approval was issued by looking for:
  - structural damage that may allow cross-infestation of the goods
  - pests, residues or contaminants that may infest or contaminate the goods
- If the condition has changed for any of the above reasons you must not load prescribed goods into the container.
- If a container approval is not current the empty container must have another container approval issued before the container can be loaded or another approved container is provided by the client to replace it.

### 3.3 Documentation

- Give client a **copy** of the completed Export Compliance Record

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- Send the Department of Agriculture a **copy** of the completed Export Compliance Record and any supporting documentation
- Retain original completed Export Compliance Record and any supporting documentation for a minimum of 2 years for auditing purposes.

## 4. Conduct goods inspection tasks

### 4.1 Assess the consignment

- Liaise with the client to:
  - identify the consignment to be inspected. The consignment consists of each container listed on the RFP/NOI
  - confirm the goods present complies with the information on the NOI
  - ensure the consignment is accessible for sampling
- Identify which category the consignment will be sampled and inspected under. (Refer to PEOM Volume 8A Table 1)
- Ensure all trade description requirements are met
- If the goods information **does not** comply 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
- For **exports to China** check that there is at least one label on each bale or pack of bales in standardised Chinese characters and in English detailing all of the following:

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- Product i.e. ‘Oaten Hay’
- Establishment name and address
- Premises registration number
- Country of origin
- Country of destination
- Weight of bales or pack of bales
- Product use i.e. animal feed
- Crude protein
- Neutral detergent fibre levels

## 4.2 Inspect the consignment

### 4.2.1 Drawing Samples

- For specific sampling methodology refer to:
  - Attachment 1: Bales, inline and end-point
  - Attachment 2: Loose hay/straw, inline
  - Attachment 3: Bagged chaff, end-point

### 4.2.2 Inspecting Samples

- Inspect all samples using suitable equipment (refer to PEOM Volume 8A for a list of equipment).
- Examine the samples for live pests, vermin and contaminants in accordance with the following tolerances:
  - Nil tolerance for live pest infestations unless specified by the Secretary in PEOM Volume 8A
  - Nil tolerance for vermin including rodents and their waste unless specified by the Secretary in PEOM Volume 8A
  - A tolerance level may apply for contaminants, refer to PEOM Volume 8A for details of tolerance levels

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- Note: tolerance levels specified by the importing country take precedence over tolerance levels stated in PEOM
- If there is any **other** contaminating material where no tolerance level is stipulated:
  - stop the inspection and obtain advice from the client as to whether they wish to continue the inspection
  - record the contaminant/s and the client's advice in the comments section of the Export Compliance Record
  - recommence goods inspection based on the client's advice
  - do not reject for these contaminants
- For specific inspection methodology refer:
  - Attachment 1: Bales inline and end-point
  - Attachment 2: Loose hay/straw inline
  - Attachment 3: Bagged chaff, end-point

## 5. Pass the goods after inspection

- Pass the consignment if you are satisfied that all relevant tolerance levels have not been exceeded
- Record inspection results on the Export Compliance Record
- Distribute copies of the Export Compliance Record as per section 3.3
- Inform the client that the passed goods must be segregated from uninspected product, rejected product and product not pressed. Chinese protocol requires the use of physical barriers and clear identification of passed product.

## 6. Reject the goods after inspection

- Reject the goods if any of the tolerances as stated in 4.2.2 have been exceeded.
  - Apply zero tolerance for live insect pests and vermin, irrespective of whether the pests are found inside or outside of the bales, inside the container, or in the samples inspected
- For specific rejection methods refer to:

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- Attachment 1: Bales, inline and end-point
- Attachment 2: Loose hay/straw, inline
- Attachment 3: Bagged chaff, end-point

## 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
  - Conduct flowpath inspection tasks
  - Conduct goods inspection tasks
    - For specific reinspection methodology refer to:
      - Attachment 1: Bales, inline and end-point
      - Attachment 2: Loose hay/straw, in-line
      - Attachment 3: Bagged chaff, end-point

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- Pass or reject the goods after inspection.

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# Plant Export Operations Branch

## Work Instruction

### Inspection and certification of hay or straw for export:

#### Attachment 1: Bales, inline and end-point

For inline sampling bales must be taken off the conveyance system before stacking into packs. Bales must be taken at the time of processing for each container being loaded.

For end point sampling bales must be removed from the container being sampled.

#### Inline sampling for Bales

##### Drawing Samples

- Inline sampling requires **each** container in the consignment to be sampled.
- Remove at least **2 standard bales** (20-25 kg) at random from the production line **prior** to packing each container in the consignment.

#### End point sampling for Bales

##### Drawing Samples

- **Fumigated hay:** For hay in containers that has been fumigated prior to sampling, sample containers at random using the sampling plan in Table 1.
  - Note: You must sight a fumigation certificate(s) and gas free certificate(s) before commencing sampling.

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Table 1: Random sampling plan

Number of containers in the consignment	Number of containers to be sampled
2–5	2
6–10	3
11–30	5
31–50	7
50 or more	10

- Sample **2 bales** per container ensuring that at least one bale is from the second or third row of bales to ensure a representative sample.
- For containers of large bales (>100 kg), the exporter/packer may load 20-25 kg bales processed from the same source into the container prior to treatment for the purpose of sampling.
- **Unfumigated hay:** If you do not have evidence that fumigation has occurred, or if it becomes evident that the fumigation was not effective, every container must be inspected as follows:
  - For containers of 20-25 kg bales, remove at least **10 bales** from each container accessing the second and third rows of bales to ensure a representative sample.
  - For containers of large bales (>100 kg), remove at least **5 bales** from each container ensuring that at least three bales are selected from the second and third row.

### Inspecting Container

Refer to Table 1 of PEOM Volume 8A as to which containers must be inspected.

- Examine container doors, seals, floor, walls, residues on the floor and surface of all visible bales for pests and contaminants.
- Residue from the floor and bales of hay of sampled containers must be brushed into the sieve and examined for pests and contaminants.

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## Inspecting Samples

Bales can be inspected using either the biscuit technique or the coring technique as follows:

- **Biscuit technique:**

- Inspect the surface of each bale for pests or contaminants.
- Cut the straps (if not already done) of the bale. Consider that a bale is made up of 10-15 biscuits. Select three biscuits for sampling.
- Take the three biscuits from the bale and inspect all surfaces and shake the 'biscuits' out over the inspection bench/sieve.
- Examine closely, all residues on the bench top/top of sieve, using a magnifying glass where necessary.
- Brush the residues into the sieve (a minimum of three (3) sieve lots per bale is required).
- Shake the sieve for at least thirty (30) seconds.
- Examine both the top section of the sieve and lower tray for pests (insects, disease etc.) and contaminants (weed seeds, soil etc) for at least one minute.

- **Coring technique:**

- Collect core samples from each bale selected, ensuring at least a 0.5 kg sample of cores is collected per container.
- Core samples should be taken near the centre of the "butt" end, at a right angle to the surface.
- Combine all cores into a single sample and mix them thoroughly. The whole sample should be kept intact without subdivision.
- Inspect all surfaces and shake the sample out over the inspection bench/sieve.
- Examine closely, all residues on the bench top/top of sieve, using a magnifying glass where necessary.
- Brush the residues into the sieve.
- Shake the sieve for at least thirty (30) seconds.
- Examine both the top section and lower tray for pests (insects, disease etc) and contaminants (weed seeds, soil etc) for at least one minute.

## Pass the goods after inspection

As per section 5 of the work instruction

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## Reject the goods after inspection

As per section 6 of the work instruction

- For hay rejected for a live insect
  - Advise client that for the rejection for live insects they can treat the rejected goods in the container
  - Exporter to re-present goods for inspection with treatment details
- For hay rejected for a live rodent:
  - Advise the client of the rejection
  - Advise that rejected goods must be treated with a fumigant
    - Do **not** recommend any particular fumigant as the choice of treatment is the responsibility of the client
  - After fumigation, unpack containers to remove dead rodents
  - Repack containers. Fumigate if unable to maintain security of hay during unpacking and repacking
  - Exporter to re-present goods for inspection with treatment details
- For hay rejected for dead rodent found in container (not within a bale):
  - Advise the client of the rejection
  - Unpack container to remove dead rodents
  - Repack containers
  - Advise that rejected goods must be treated with a fumigant
    - Do **not** recommend any particular fumigant as the choice of treatment is the responsibility of the client
  - Exporter to re-present goods for inspection with treatment details
- For hay rejected for dead rodent found within bale:
  - Advise the client of the rejection
  - Remove a further ten bales from the area around the rejected bale

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- Remove a further two bales from the other inspected containers in the consignment
- Inspect the additional bales using the biscuit technique to establish frequency of dead rodents
- Contact the Department of Agriculture Regional Plant Export Manager with inspection results for determination of the appropriate action to be taken
- If pests or contaminants that have a tolerance are detected:
  - Inform the client and have the client identify the pest or contaminant
  - Record any identification in the comments section of the Export Compliance Record
- If tolerance levels specified in the PEOM volume 8A have been exceeded reject the entire consignment
  - Record any identification and any appropriate rejection procedures in the comments section of the Export Compliance Record
- Record rejection of consignment on the Export Compliance Record
- Distribute copies of the Export Compliance Record as per section 3.3

Reinspect the resubmitted goods

Refer to section 7 and above instructions

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# Plant Export Operations Branch

## Work Instruction

### Inspection and certification of hay or straw for export:

#### Attachment 2: Loose Hay or Straw, in-line

Samples must be taken off an in-line conveyance system after the slicing and teasing of hay and straw. In-line sampling requires each container in the consignment to be sampled. Samples must be taken at the time of processing for each container being loaded. Samples are to be drawn directly off the conveyance system belt either manually or through an approved automatic sampler.

#### Drawing Samples

- In-line sampling requires **each** container in the consignment to be sampled.
- Total amount of hay or straw to be sampled and inspected from each container is 0.5kg, taken as a minimum of 5 sub-samples
- Only samples drawn from the same container can be combined for inspection

#### Inspecting Samples

- Inspect all samples using suitable equipment
- Shake the sample out over the inspection bench/sieve.
- Examine closely, all residues on the bench top/top of sieve, using a magnifying glass where necessary.
- Brush the residues into the sieve.
- Shake the sieve for at least thirty (30) seconds.
- Examine both the top section and lower tray for pests (insects, disease etc) and contaminants (weed seeds, soil etc) for at least one minute.

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### Pass the goods after inspection

As per section 5 of the work instruction

### Reject the goods after inspection

As per section 6 of the work instruction

- For hay rejected for a live insect
  - Advise client that for the rejection for live insects they can treat the rejected goods in the container
  - Exporter to re-present goods for inspection with treatment details
- For hay rejected for a live rodent:
  - Advise the client of the rejection
  - Advise that rejected goods must be treated with a fumigant
    - Do **not** recommend any particular fumigant as the choice of treatment is the responsibility of the client
  - Exporter to re-present goods for inspection with treatment details
- For hay rejected for dead rodent:
  - Advise the client of the rejection
  - Remove dead rodent
  - Advise that rejected goods must be treated with a fumigant
    - Do **not** recommend any particular fumigant as the choice of treatment is the responsibility of the client
  - Exporter to re-present goods for inspection with treatment details
- If pests or contaminants that have a tolerance are detected:
  - Inform the client and have the client identify the pest or contaminant
  - Record any identification in the comments section of the Export Compliance Record
- If tolerance levels specified in the PEOM volume 8A have been exceeded reject the container

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- Record any identification and any appropriate rejection procedures in the comments section of the Export Compliance Record
- Record rejection of consignment on the Export Compliance Record
- Distribute copies of the Export Compliance Record as per section 3.3

Reinspect the resubmitted goods

Refer to section 7 and above instructions

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## Work Instruction

### Inspection and certification of hay or straw for export:

#### Attachment 3: Bagged chaff, end-point

Bagged chaff can only be inspected end-point.

##### Drawing Samples

- End point sampling requires **each** container in the consignment to be sampled
- Total amount of chaff to be sampled and inspected from each container is 0.5kg, taken across a minimum of 5 bags
- Only samples drawn from the same container can be combined for inspection

##### Inspecting Samples

- Inspect all samples using suitable equipment
- Shake the sample out over the inspection bench/sieve.
- Examine closely, all residues on the bench top/top of sieve, using a magnifying glass where necessary.
- Brush the residues into the sieve.
- Shake the sieve for at least thirty (30) seconds.
- Examine both the top section and lower tray for pests (insects, disease etc) and contaminants (weed seeds, soil etc) for at least one minute.

##### Pass the goods after inspection

As per section 5 of the work instruction

##### Reject the goods after inspection

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As per section 6 of the work instruction

- For chaff rejected for a live insect irrespective of whether the live insect is found in the goods, on the external surface of the bags or on the pallets:
  - Advise client that for the rejection for live insects they can treat the rejected goods in the container
  - Exporter to re-present goods for inspection with treatment details
- For chaff rejected for a live rodent irrespective of whether the rodent is found in the goods, on the external surface of the bags or on the pallets:
  - Advise the client of the rejection
  - Advise that rejected goods must be treated with a fumigant
    - Do **not** recommend any particular fumigant as the choice of treatment is the responsibility of the client
  - Advise client that for the rejection for live rodents they can treat the rejected goods in the packages if the packaging material is suitable for fumigation
  - Exporter to re-present goods for inspection with treatment details
- If pests or contaminants that have a tolerance are detected:
  - Inform the client and have the client identify the pest or contaminant
  - Record any identification in the comments section of the Export Compliance Record
- If tolerance levels specified in the PEOM volume 8A have been exceeded reject the entire consignment
  - Record any identification and any appropriate rejection procedures in the comments section of the Export Compliance Record
- Record rejection of consignment on the Export Compliance Record
- Distribute copies of the Export Compliance Record as per section 3.3

Reinspect the resubmitted goods

Refer to section 7 and above instructions

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