



# GUIDELINE

## Export Compliant Goods Storage

### Direction to staff

You must comply with this instructional material under the Practice Statement Framework.

### Direction to Authorised officers

Authorised officers must exercise powers and perform functions in accordance with any lawful directions or instructions issued by the department.

### Direction to industry

This guideline outlines the policy and processes for the management of export compliant goods storages. All parties with roles and responsibilities explicit in this guideline and legislation must comply with it.

### Summary of main points

This document outlines:

- ECGS prerequisite and application requirements
- transportation and storage requirements
- inspection requirements
- audit requirements

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## Introduction

Export Compliant Goods Storage (ECGS) is an approved receptacle within a registered establishment where goods that have passed inspection (Export Compliant Goods (ECG)) are stored prior to export. ECGS registered establishments can have prescribed goods inspected and passed by AO at an earlier stage in the supply chain and have the passed goods securely stored in an approved receptacle (storage) for a period of up to 28 days before export, or a period approved by the Secretary. The validity period for the goods starts from the commencement of the inspection of the first load presented to the AO (for goods stored in an ECGS receptacle). A Request for Permit (RFP) has to be lodged prior to undertaking phytosanitary sampling and inspection. The receptacle is to be cleaned frequently and must be documented in cleaning and hygiene procedures of the establishment. The flow path from the point of sampling to the ECGS must be inspected and passed by an AO prior to loading ECG into an ECGS. The goods must be inspected by an AO and be passed before they can be transferred into an ECGS. The receptacle must then to be secured to maintain the phytosanitary integrity of the ECG until time of export. For outloading, an AO must pass the flow path from ECGS to point of export/transport prior to loading (passed goods) into a vessel or a container for export. When the ECG are to be exported within 28 days of first inspection, or a period approved by the Secretary, no further inspection of the goods is required at the time of export.

This volume details the overarching requirements and procedures for the approval and certification of ECGS within registered establishment premises. The volume applies to registered establishments that have been approved by the Department of Agriculture, Water and the Environment to use ECGS as an alternative to current end point inspection methods. Registered establishments must meet prerequisites and ongoing audit requirements to pass the application process and become an ECGS registered establishment. Storages capable of maintaining the integrity of ECG qualify for ECGS approval; receptacles which cannot maintain the integrity of ECG during storage will not qualify.

ECGS approval is only for prescribed goods. Refer to the References: [Export compliant goods storage \(ECGS\)](#) and [Export compliant goods storage \(ECGS\) hazard identification and mitigation survey](#) for more detailed information.

## **ECGS prerequisite and application requirements**

The occupier/operator of the registered establishment must apply to vary the registration of the establishment, as outlined in the Guideline: [Management of plant export registered establishments](#), to have fixed areas within an establishment approved for ECGS. Establishments applying for ECGS must be able to demonstrate a consistent history of good operating practices through the maintenance of high standards of cleanliness and minimal goods contamination. Only registered establishments that have maintained excellent audit results and have not had any major corrective/critical actions at the time of seeking approval for ECGS will be considered.

### **Prerequisite requirements**

This section contains prerequisite requirements for an ECGS registered establishment. Only registered establishments that meet the following mandatory requirements will be eligible to apply for ECGS.

#### **Registered establishment**

Premises must be registered under the *Export Control Act 2020* and meet the general establishment management requirements set out in the legislation and outlined in the Guideline: [Management of plant export registered establishments](#).

#### **Transportation and Storage**

Goods at the ECGS establishment must be transported, stored and handled in a manner which ensures that goods do not become contaminated or re-infested once they have passed inspection by an AO. An approved, documented and auditable cleaning process for the receptacle must be provided. Transportation and storage records at the ECGS establishment must also be documented.

#### **Equipment Use**

Any equipment used at the ECGS establishment must be maintained in a manner that prevents contamination of ECG. Equipment must be able to be visually inspected and maintenance records documented.

#### **Sanitation and Pest Control**

All elements must be monitored and controlled and the establishment is to maintain appropriate records of sanitation and pest control measures and activities. The hygiene process and pest management system must be documented.

#### **Work Health and Safety**

The establishment must have a defined work health and safety policy and documented procedures to ensure the safety and health of staff and visitors.

#### **Contingency Arrangements**

The establishment must have a defined and documented procedure and policy for diverting non-compliant goods (NCG) away from ECGS so they do not compromise the integrity of ECG.

#### **Documented Inventory System**

The registered establishment seeking approval for ECGS must maintain accurate records and traceability for all receivals, treatments, outturn, and operational processes through the facility.

## Sampling System

Establishments must have an automatic sampling system. Samples collected for inspection by AO during filling of the ECGS must be taken by an automatic sampling system capable of delivering a representative sample and suitably maintaining its integrity.

## Hazard Identification and Mitigation Survey (HIMS)

All steps in the ECGS process must be assessed to consider the risk of contamination. Potential hazards and consequences need to be identified and preventative measures implemented to minimise or eliminate those risks. The risk analysis must use HIMS to manage all possible risks and the likelihood of their occurrence.

**Refer to** Reference: [Export Compliant Goods Storage \(ECGS\) Hazard Identification and Mitigation Survey](#) for details.

## Application Requirements

The occupier/operator of a registered establishment seeking approval for ECGS must submit an application to vary the registration of the registered establishment as outlined in the Guideline: [Management of plant export registered establishments](#).

The following documentation must be provided as attachments to the application:

### Layout of the Establishment

A site map and aerial map of the establishment showing locations of major items such as automatic sampler, inspection point, flow path from inspection point to ECGS, proposed ECGS and flow path from ECGS receptacle(s) to the point of export or transport.

### Process Flow Paths Chart

A process flow chart including automatic sampler's location, inspection point, product flow from point of inspection to ECGS, from ECGS to the point of export, transfer of rejected goods into hospital bins and/or other alternative arrangements, and the like.

## Application Process

The application process is set out in the Guideline: [Management of plant export registered establishments](#). The following is a summarised process for ECGS applications:

1. industry to submit completed ECGS application in line with ECGS prerequisites and guidelines
2. previous performance of existing registered establishments will be assessed, sites recently registered as export establishments with no previous audit records may be subject to additional surveillance/audits
3. initial desktop assessment to occur on receipt of the application which will be followed by a physical on-site assessment
4. registered establishment with approved ECGS details to be entered into Plant Exports Management System (PEMS), when functional, and Export Register Database (ER).

## Successful Applicants

The following will apply to successful applicants, a:

- 6-month provisional approval may be granted to an establishment with previous history of audits subject to audit findings
- Follow-up audit within 6 months of an approval of ECGS will be conducted in conjunction with registered establishment audits in accordance with Guideline: [Audit of plant export registered establishments](#).

## Non-successful Applicants

Non-successful applicants will need to re-apply to become an ECGS registered establishment as per the process set out in the Guideline: [Management of plant export registered establishments](#). In cases where an audit report result is the reason for rejection, the establishment will need to undergo a further 6-month audit period to determine suitability for ECGS in any future applications.

Figure 1 explains the process involved in the assessment and approval of a registered establishment for ECGS. Refer to the Reference: [Export Compliant Goods Storage](#) for further clarification and details.

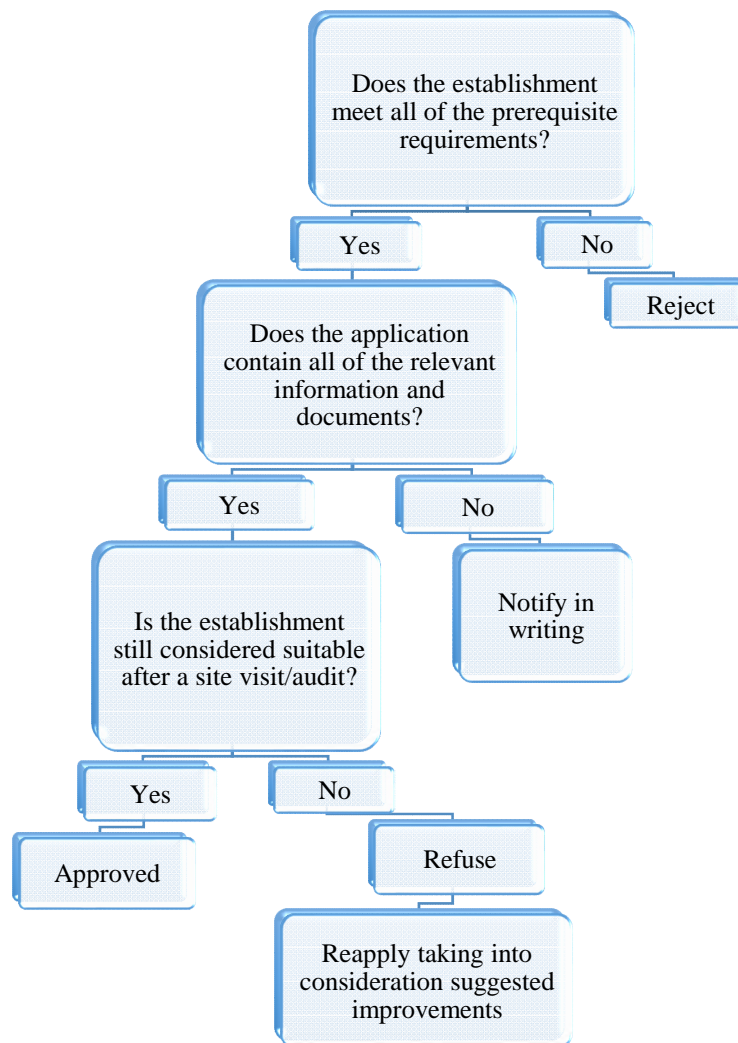


Figure 1: Processes involved in the assessment and approval of registered establishment for ECGS.

## Export Compliance

All ECGS sampling, inspection and storage must be carried out at a registered establishment.

The current inspection and sampling principles applied for prescribed goods are to be used for sampling and inspection of prescribed goods intended to be stored in an ECGS. Refer to relevant commodity Work Instructions for details. The following resources are useful for inspection and sampling criteria:

- Chapter 9 Part 2 Export Control (Plants and Plant Products) Rules 2021
- Plant Exports Operations Manual (PEOM) and relevant Work Instructions.

## Export validity period

Prescribed goods that are inspected and passed remain passed for 28 days from the date of inspection. As the loading of an ECGS receptacle cannot be filled in one day, the loading of ECG of the same species (commodity) may continue into the same ECGS for a few days as required to fill the storage, then it must be sealed. For example, it is expected that, depending on storage size, grain may continue to be loaded into an ECGS for a few days then sealed, ready for when outloading commences. However, the export validity period starts on (the date of) commencement of the inspection and storage of the first lot into the ECGS. In exceptional circumstances, the validity period can be extended beyond the 28 days.

For a back-to-back loading of same species of the commodity (where there are residual passed goods in the ECGS), either:

- the leftover goods must be re-inspected by an Authorised Officer (AO) by taking representative samples (against the importing countries requirements for which an RFP has been lodged) before additional ECG are loaded into the ECGS. This will provide the full 28-day validity period for the ECG in the ECGS.
- or
- further loading of ECG of the same species can proceed into the ECGS however the validity period will be limited to that of the residual passed goods (and consequently will be less than 28 days).

To extend the validity period, the exporter will need to provide details supporting the request to the [Grain and Seed Exports Program](#) no later than one business day before expiry of the initial 28-day validity period. The exporter must supply details of the exceptional circumstances for which an extension is required, a justifiable period of extension, and information that gives assurance that the condition of the goods has not changed since inspection and that there has been no compromise of the phytosanitary status of the goods, including the security. Once a decision is made the [Grain and Seed Exports Program](#) will inform the exporter, in writing, of the decision.

## Inspection requirements

A notice of intention/RFP must be lodged with the department prior to inspection of goods intended to be stored in an ECGS. The inspection must be conducted against the most stringent import conditions of all the potential markets the exporter may be intending to export the goods. A separate RFP has to be raised by the exporter if the ECG stored in an ECGS are to be exported to a market other than the one against which the goods were inspected and originally passed.

AOs must ensure that the registered establishment is approved for ECGS before conducting inspection of goods for export compliance.

## Post inspection

### Compliance

If the goods are passed after a phytosanitary inspection, the AOs must assess the required documentation prior to forwarding export documentation to the department.

### Storage

The ECGS receptacle(s) must be secured after filling and constructed in a way that will not undermine the pest, disease and passed status of the prescribed product during the storage period.

## Traceability

Traceability of the goods intended for export must be maintained and it is the responsibility of the export registered establishment to maintain accurate records.

## Audit

Any follow up annual audits after initial approval for ECGS registration will be conducted in conjunction with registered establishment audits in accordance with the Guideline: [Audit of plant export registered establishments](#). Audits will be comprised of a complete review of ECGS facility operations and procedures to verify that the registered establishment continues to meet the requirements of ECGS.

## Frequency

The standard regime for ECGS is an annual audit conducted in conjunction with the registered establishment audit (periodic audit). In addition, the export establishment may be subject to surveillance and desk audits at a frequency determined by Plant Export Operations. The frequency of audits is primarily based on performance and can be scaled up for establishments with marginal performance since approvals were granted for ECGS.

## Audit Types

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

## Non-Compliances

Major and critical non-compliance may result in the suspension, revocation or variation of ECGS.

Refer to the Guidelines: [Audit of plant export registered establishments](#) and [Management of plant export registered establishments](#) for further details.

## Changing and Maintaining ECGS facilities

The department must be notified in writing of changes in circumstance, including a change in ownership, of the registered establishment as outlined in the Guideline: [Management of plant export registered establishments](#).

An application to vary the ECGS registered establishment must be made to the department for changes to the scope of the approved ECGS, as per the Guideline: [Management of plant export registered establishments](#). Some examples of major changes to the scope of ECGS may include:

- relocation of the establishment
- change in the location of an ECGS storage
- change of ownership and new owner no longer wants to continue with ECGS operation
- change in the operational parameters such as adding another component to the existing structure such as addition of hay and straw and/or forest products to a grain and seed export registered establishment.

## Related Material

- *Export Control Act 2020*
- *Export Control (Plants and Plant Products) Rules 2021*
- [Plant Exports Operations Manual](#)
  - *Guideline: Management of plant export registered establishments*
  - *Guideline: Audit of plant export registered establishments*
  - *Reference: Export Compliant Goods Storage*
  - *Reference: Export compliant goods storage (ECGS) hazard identification and mitigation survey*
  - *Work Instructions*

## Contact Information

- Authorised Officer Hotline: 1800 851 305
- Authorised Officer Program: PlantExportTraining@awe.gov.au
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## Document information

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## Version history

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

| Version | Date       | Amendment details   |
|---------|------------|---|
| 1       | 29/09/2014 | Updated the reflect revised requirements.   |
| 2       | 20/12/2016 | First publication of this guideline   |
| 3       | 28/03/2021 | Amendments for commencement of the <i>Export Control Act 2020</i> and associated Plant Rules. |