

Australian Government

Department of Agriculture, Fisheries and Forestry

Low-risk Framework trial

Responsibilities of Live Fish Establishments

The department is making a number of significant changes to the way that we regulate and audit low-risk dairy, eggs and fish export establishments, moving to a data driven and riskbased regulatory model. This includes storage facilities, fishing vessels, and live fish establishments (excluding establishments who export bivalve molluscs). The trial of the low-risk framework has commenced, utilising Artificial Intelligence as an assessment and verification tool, and will provide a reduction in audit and regulatory burden. Those taking part in the trial are required to submit documentation to the department via a single online digital portal, which will utilise artificial intelligence to assist in analysis of establishment compliance.

The establishments subject to the new alternative audit approach are required to submit documentation and be engaged in sector level verification activities. The following data will be required by the department:



Establishment questionnaire



Declaration of conformity



Photo and video for Artificial Intelligence (AI) verification



Other approved arrangement documents or records as requested

Sector level verification/assurance

Employees in an establishments management and control will have access to the portal and are responsible for final submission of files and declarations. The department may reach out to establishments for further information or action following submissions of files and declarations. As a part of completing the new annual requirements, establishments will be required to declare that they:

- Understand their requirements
- Have documented evidence of staff training and competency
- Have completed verification activities including internal audits as scheduled
- Have actioned all non-compliances identified in the last

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For more information visit the 'Low-risk audit trials' webpage. Communication will be ongoing but if you have questions in the meantime, please dairyeggsfish@aff.gov.au

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Examples of quality images for AI verification







AI verification inputs

You will be required to upload video and photos of your establishment of the below elements:

- Packaging and labelling process
- Product packaged in containers with labels and transfer documentation
- General cleanliness of packaging area
- General cleanliness of live fish storage tanks
- Establishment location Google maps (screenshot) including address

Files uploaded for AI verification must:

- Be uploaded in the correct file type
 - Photos (e.g. png, jpeg)
 - Videos (e.g. mp4)
- Clear image or video
 - Not pixelated of blurry
 - Object of image or video not obstructed
 - Space well lit
- Clearly show required element

Live fish

1	Please confirm details of primary and secondary contacts at your establishment	Complete table provided, noting name, email and phone for primary and secondary contacts
2	Please confirm your establishments current address of operations.	Write establishment address
3	Please confirm your company's business address (if different)	Write companies business dress
4	Please confirm your company's Australian Business Number(s) (ABN) and Australian Company Number (ACN).	Write ABN and ACN
5	Are there any activities at this establishment other than those that relate to packing of live seafood for export?	Select yes or no box, if yes provide additional details
6	Where do you source water for use in your live fish tanks from? Please provide specific details of location (ie. sea water from harbour, river water, rainwater, manufactured water) If sourcing from certain areas, may need to do more filtering, UV treatment	List where water for live fish tanks is sourced from
7	How do you determine that the water is suitable for use?	List how water is determined to be suitable
8	How do you treat fish in poor condition? (For example; do not export, isolate (hospital area), antibiotics/vet treatment with withholding periods).	List how fish in poor condition are treated
9	Do you sedate or chill live seafood for transport?	Select yes or no box, if yes provide additional details of method used
10	Is product loaded direct for export from the establishments, or on sold and transferred to another establishment before export?	Select yes, no or N/A box
11	How many fulltime and part time staff are currently on site?	Provide number of staff on vessel
12	Have there been any changes to key management personnel in the last 12 months, including persons in control of daily operations?	Select yes or no box, if yes, Select additional yes or no box to confirm if the department has been notified of changes
13	What percentage (approximately by last financial year) of live fish you receive is exported?	List percentage of product exported and any additional information is optional)
14	Has your establishment been subject to any product recalls or withdrawals in the last 12 months?	Select yes or no box, if yes provide additional details
15	Has any product loaded out of your establishment been subject to any notification by overseas authorities, including detained consignments and errors on certification	Select yes or no box, if yes provide additional details
16	Is this vessel audited under any third party food safety certification schemes? (For example, SGS or SAI Global, HACCP)	Select yes or no box, if yes provide additional details