



**Australian Government**  
**Department of Agriculture,  
Fisheries and Forestry**

# Performance standards – Packing product post-treatment or Pest Free Area (PFA) product outside of the PFA

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## Purpose of this document

This document:

- outlines the performance standards facility managers or responsible staff must meet to gain and maintain registration for the packing of product after a phytosanitary treatment has occurred, or where product was grown in a Pest Free Area (PFA) and is being packed outside of the PFA.
- sets the non-compliance ratings for those performance standards

**Note:** Where more than one non-compliance rating is provided, the auditor can choose the rating depending on the severity of the non-compliance.

- does not replace the base performance standards for a registered establishment
- must be read in conjunction with the following documents on the [Plant Export Operations Manual](#)
  - Exports Policy: [Management of plant export registered establishments](#)
  - Guideline: [Audit of plant export registered establishments](#)
  - Guideline: [Maintenance of phytosanitary security for horticulture exports](#)
  - relevant treatment standards.

**Note:** These performance standards do not cover re-packing PFA product outside a PFA. Re-packing product refers to the re-packing of sorted and graded product from one carton into another. For requirements for re-packed PFA product, or for deconsolidating, inspecting and/or treating PFA product outside of a PFA, please refer to the Reference: Performance standards for handling fruit fly PFA product outside of a PFA.

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## Performance standards

### General requirements

The following table describes the performance standards and non-compliance ratings for the general requirements when packing PFA or treated product.

Checklist items	Performance standards	Non-compliance rating
1.1 General	Packing facilities may only utilize this function where: <ul style="list-style-type: none"> <li>its use is permitted by the pathway and/or protocol AND</li> <li>the facility is a registered establishment and has been approved for this function by the department.</li> </ul>	Critical
1.2 Pest Free Area (PFA)	<ul style="list-style-type: none"> <li>Product from a PFA must be secured at the carton or pallet level prior to leaving the PFA unless specifically approved otherwise.</li> </ul> <p><b>Note:</b> fruit bins may be secured as a pallet if they are fully sealed, including the top and the bottom of the bin.</p> <ul style="list-style-type: none"> <li>Product must remain secured until it is within an insect-proof space that has no other untreated product in it.</li> </ul>	Critical
1.3 Treatment	<ul style="list-style-type: none"> <li>All product must use secure packaging (carton or pallet level) or isolation by physical barriers (such as Pantech trucks or shipping containers) prior to transport from the treatment facility to the packing area</li> <li>Product must remain secured until it is within an insect-proof space that has no other untreated product in it.</li> </ul>	Critical
1.4 Treatment facility	The treatment facility manager or responsible staff must meet the applicable requirements in the relevant treatment standards, protocol (if applicable) and the performance standards of the treatment.	Critical

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Checklist items	Performance standards	Non-compliance rating
1.5 Packing facility	<ul style="list-style-type: none"> <li>• Where the protocol mandates accredited properties for packhouses, the packing facility manager or responsible staff must meet accredited property requirements outlined in the Exports Policy: <a href="#">Management of Horticulture Export Accredited Properties.</a></li> <li>• Packing facility managers or responsible staff must nominate personnel who will oversee packing of treated/PFA product and ensure               <ul style="list-style-type: none"> <li>○ the insect-proof status of the packing area is in-place prior to packing</li> <li>○ the packing area remains insect-proof for the duration of packing</li> <li>○ no other product is unsecured in the packing area during packing</li> <li>○ the packing area and packing line are clean and free from pests and contaminants prior to packing. All host material (discarded fruit, leaves and the like) must be removed from the insect proof space prior to packing.</li> </ul> </li> </ul>	Critical

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## Structural requirements

The following table describes the performance standards and non-compliance ratings for the structural requirements for packing product post-treatment or PFA product outside of the PFA.

Checklist items	Performance standards	Non-compliance rating
2.1 PFA equipment	Cartons or bins used to transport PFA product outside of the PFA must be capable of maintaining phytosanitary security of the product during transit.	Critical
2.2 Treatment chamber security	Treatment chambers must be an insect-proof space capable of maintaining phytosanitary security of goods post-treatment.	Major
2.3 Packing facility security	<ul style="list-style-type: none"> <li>• The packing area must be a fully secure insect-proof space.</li> <li>• All doors, entrances and exits of the packing facility must be suitably designed to prevent the entry of pests.</li> <li>• An establishment may use one or more of the following to help prevent the entry of pests               <ul style="list-style-type: none"> <li>○ an antechamber</li> <li>○ knockdown area</li> <li>○ airlock</li> <li>○ double doors</li> <li>○ automatic doors</li> <li>○ rubber/plastic curtains</li> <li>○ air curtains, or</li> <li>○ other mechanism approved by the department.</li> </ul> </li> </ul> <p><b>Important:</b> Insect-proof spaces must have insect-proof mesh covering all openings greater than 1.6 mm (including doors, windows, vents or ducts).</p>	Critical

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## Processes

The following table describes the performance standards and non-compliance ratings for the processes for packing product post-treatment or PFA product outside of the PFA.

Checklist items	Performance standards	Non-compliance rating
3.1 PFA	<ul style="list-style-type: none"> <li>PFA product must not be exposed or deconsolidated in any way that may result in risk of infestation.</li> <li>Facility managers or responsible staff must have a documented system in place to manage the phytosanitary risk when bringing PFA product into a non-PFA area.</li> <li>Where PFA product is stored inside the insect-proof room in the treatment facility, the establishment must demonstrate how the product is protected from infestation and the insect-proof status of the room is maintained.</li> </ul>	Critical
3.2 Treatment	<ul style="list-style-type: none"> <li>Facility managers or responsible staff must maintain a documented system in place to manage the phytosanitary risk post-treatment. For example, product remains in the treatment chamber/cool room post-treatment until packing commences.</li> <li>Where treated product is stored inside the insect-proof room in the treatment facility, the establishment manager or responsible staff must demonstrate how the product is protected from infestation and the insect-proof status of the room is maintained.</li> </ul> <p><b>Note:</b> Isolation by distance is <b>not</b> a permitted method of phytosanitary security under this policy.</p>	Major
3.3 Transport	<p>When produce is transported from the PFA or treatment facility to the packing facility, product must be secure by an approved means of phytosanitary security.</p> <p><b>Note:</b> For further information on approved security methods, refer to the Guideline: <a href="#">Maintenance of phytosanitary security for horticulture exports</a>.</p>	Critical

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Checklist items	Performance standards	Non-compliance rating
3.4 Packing	<p>Facility managers or responsible staff must have a process in place when packing PFA or treated product to ensure:</p> <ul style="list-style-type: none"> <li>• the insect-proof status of the packing area is in-place prior to packing</li> <li>• the packing area and packing line are clean and free from pests and contaminants prior to packing. All host material (discarded fruit, leaves and the like) has been removed from the insect proof space prior to packing.</li> <li>• the packing area remains insect-proof for the duration of packing</li> <li>• no other product is unsecured in the packing area during packing</li> </ul> <p><b>Note:</b> This may include a form completed by nominated personnel for each packing run.</p>	Critical or major
3.5 Packing materials	<ul style="list-style-type: none"> <li>• All cartons or other packaging material used to store and transport treated product are <ul style="list-style-type: none"> <li>○ checked for pests and contaminants</li> <li>○ cleaned/discarded if required.</li> </ul> </li> <li>• All packaging cartons for export must be clean and new.</li> </ul>	Major or minor
3.6 Packing	<p>All product must be secured by an approved method of phytosanitary security before the insect-proof status within the packing area can be compromised.</p> <p><b>Note:</b> For further information on approved security methods, refer to the Guideline: <a href="#">Maintenance of phytosanitary security for horticulture exports</a>.</p>	Critical

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## Phytosanitary security

The following table describes the performance standards and non-compliance ratings for phytosanitary security of product packed post-treatment or from a PFA, outside of the PFA.

Checklist items	Performance standards	Non-compliance rating
4.1 General	<ul style="list-style-type: none"> <li>• Establishment managers or responsible staff must demonstrate how phytosanitary security is maintained during               <ul style="list-style-type: none"> <li>○ treatment (if relevant)</li> <li>○ transport to packhouse</li> <li>○ packing</li> <li>○ storage.</li> </ul> </li> <li>• The method of maintaining security meets the requirements in the Guideline: <a href="#">Maintenance of phytosanitary security for horticulture exports</a> <ul style="list-style-type: none"> <li>○ Product which has been irradiated or PFA product must be secured at carton or pallet level from the time it leaves the treatment facility or PFA, until it arrives in the insect-proof space at the packing facility. After packing, product must again be secured at carton or pallet level prior to moving.</li> <li>○ Product which has undergone phytosanitary treatment (excluding irradiation) and is being stored prior to packing, must use either secure packaging, isolation by physical barriers, or isolation by insect-proof space.</li> <li>○ Product which has undergone phytosanitary treatment (excluding irradiation) and is being transported from the treatment facility to the insect proof space at the packing facility must use either secure packaging or isolation by physical barriers, such as Pantech trucks or shipping containers.</li> <li>○ Product which has undergone phytosanitary treatment (excluding irradiation) and has been packed under this pathway must be secured using either secure packaging, isolation by physical barriers or isolation by insect proof space.</li> </ul> </li> </ul> <p><b>Note:</b> Isolation by distance is <b>not</b> permitted under this policy.</p>	Critical

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Checklist items	Performance standards	Non-compliance rating
4.2 Segregation of goods	PFA and treated product must be: <ul style="list-style-type: none"> <li>• identified</li> <li>• segregated from other goods and secured in line with Exports Policy: <a href="#">Management of plant export registered establishments</a> and Guideline: <a href="#">Maintenance of phytosanitary security for horticulture exports</a>.</li> </ul>	Major
4.3 Traceability	<ul style="list-style-type: none"> <li>• Facility manager or responsible staff can demonstrate traceability of the goods back to the grower (if required).</li> <li>• Transfer records must be utilized for each movement of goods and demonstrated at audit.</li> </ul>	Major or critical
4.4 Post-treatment security	Facility manager or responsible staff have procedures in place to ensure the post-treatment pathway, including during transport at packhouse and in storage, prevents insect infestation and is maintained free from regulated pests.	Major

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## Documentation

The following table describes the performance standards and non-compliance ratings for documentation when packing product post-treatment or PFA product outside of the PFA.

Checklist items	Performance standards	Non-compliance rating
5.1 Documented procedures	<p>The following procedures must be documented, current and being followed by the relevant staff:</p> <ul style="list-style-type: none"> <li>• receipt at treatment facility</li> <li>• storage</li> <li>• treatment procedures</li> <li>• transport to packing facility</li> <li>• packing, including               <ul style="list-style-type: none"> <li>○ cleaning processes</li> <li>○ procedures to ensure the space is maintained as pest free (including staff and product movement to avoid opening of doors)</li> </ul> </li> <li>• load-out</li> <li>• phytosanitary security procedure as per Exports Process Instruction: <a href="#">Maintenance of phytosanitary security for horticulture exports</a></li> <li>• traceability procedures.</li> </ul>	Critical
5.2 Records	Records for receipts, treatment, packing, inspection and load-out must be maintained for a minimum of 2 years.	Minor or major
5.3 Records	<p>The following traceability records must be kept</p> <ul style="list-style-type: none"> <li>• receipts</li> <li>• storage</li> <li>• dispatch.</li> </ul> <p><b>Important:</b> Records must be kept for a minimum of 2 years.</p>	Major

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Checklist items	Performance standards	Non-compliance rating
5.4 Training records	<ul style="list-style-type: none"> <li>• Training records must be kept for staff undertaking the following tasks               <ul style="list-style-type: none"> <li>○ activities relating to relevant treatment standards and any protocol requirements</li> <li>○ handling of PFA and treated goods, including transport of fruit from PFA or treatment facility to packhouse</li> <li>○ oversight of packing PFA and treated product and ensuring the integrity of the insect-proof space prior to packing.</li> </ul> </li> <li>• Training records must record               <ul style="list-style-type: none"> <li>○ details of the training undertaken</li> <li>○ date the training was completed</li> <li>○ name of the individual that was trained</li> <li>○ evidence of competence.</li> </ul> </li> <li>• If the training was conducted internally all training material must be made available on request.</li> </ul> <p><b>Important:</b> Records must be kept for a minimum of 2 years.</p>	Minor or Major

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## Related material

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

- Exports Policy: *Management of plant export registered establishments*
- Guideline: *Audit of plant export registered establishments*
- Guideline: *Maintenance of phytosanitary security for horticulture exports.*
- relevant phytosanitary treatment standards.

Version	Date published	Date last approved	Review type	Summary of review
1	01/05/2024	01/05/2024	New document	First publication of this reference.

## Appendix A: Definitions

The following table defines terms (and their abbreviations) used in this document.

Term	Definition
Activity categories	Requirements from the Exports Policy: <a href="#">Management of plant export registered establishments</a> grouped by activity.
Checklist item	Requirements under the activity category that have been grouped by function and assigned a non-compliance rating/s.
Documented system	A written process or procedure that defines the steps in a process and who is responsible for those steps. This includes the records used to confirm the process is being followed.
Goods	Goods declared by the regulations to be prescribed goods for the purposes of the <i>Export Control Act (2020)</i> .
Insect-proof space	A space that prevents the entry of insect pests, with a permanent structure having a rigid framework, such as a container, cool room, or truck.  <b>Important:</b> Insect-proof spaces must have insect-proof mesh covering all openings greater than 1.6 mm (including doors, windows, vents or ducts).
Non-compliance rating	Ratings of minor, major and critical applied to a non-compliance to indicate the degree of seriousness.
Packing	Packing refers to the process where product from the farm is prepared for export and packed into cartons at a packhouse. The process may include: <ul style="list-style-type: none"> <li>• washing, brushing or other physical cleaning</li> <li>• removal of debris</li> <li>• culling fruit</li> <li>• packing into export cartons</li> <li>• any relevant quality assurance processes</li> </ul>
Performance standards	A benchmark derived from legislation and departmental requirements against which actual performance is measured.
Pest Free Area	An area in which a specific pest does not occur as demonstrated by scientific evidence and in which, where appropriate, this condition is being officially maintained.
Protocol	A government-to-government document that specifies import requirements and is bilaterally agreed to by Australia and the importing country authority.
Protocol market	Countries with which Australia has an agreed protocol. For a list of protocol markets see the Reference: <a href="#">Table of plant export protocol markets</a> .

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