



Performance standard—Establishment start-up audits for log exports to China

Purpose of this document

This document outlines the performance standards that registered establishments must meet to gain approval for log exports to China (logs with and without bark) including mandatory:

- establishment site requirements
- establishment fumigator responsibilities for the mandatory importing country treatment
- fumigation of logs for export to China outlined as per the [Manual of Importing Country Requirements \(Micor\)](#)
- Authorised Officer (AO) requirements.

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Start up audit

Purpose of the audit

Initial or 'startup' audits of establishment processes for the exports of logs with and without bark to China aim to assess key establishment criteria. The focus of the audit is to ensure the establishment has appropriate facilities, that the fumigator meets and understands the requirements and that the AO is aware of, understands and can follow the required sampling and inspection requirements.

As outlined under section 266 of the *Export Control Act 2020* (the Act), the Secretary may require audits of export operations carried out at a registered establishment.

Audits may focus on various aspects (ss 266(2)), including whether a kind of export operations or a kind of goods comply, have complied, or will comply with a requirement of the Act that relates to the export operations or the goods.

In the context of this performance standard, the establishment will be assessed at audit as either 'meeting' or 'not meeting' requirements.

All requirements must be met for an establishment to 'pass' and be considered suitable to commence log exports to China.

Supporting material

This document must be read in line with the:

- Departmental Policy: [Management of plant export registered establishments](#)
- Guideline: [Administering applications for plant export registered establishments](#)
- Guideline: [Audit of plant export registered establishments](#)
- Guideline: [Supporting documents for plant exports](#)
- Exports process instruction: [Inspection of forest products for export](#)
- Exports work instruction: [Inspecting forest products for export](#)
- [Methyl bromide fumigation methodology](#)
- [Sulfuryl fluoride fumigation methodology](#)
- [Guide to performing QPS fumigations with methyl bromide](#)
- [Micor case for all logs to China.](#)

Advisory findings

If a non-compliance is detected during audit, the auditor issues an advisory finding. Each advisory finding:

- describes the identified non-compliance
 - If the non-compliance can be rectified, the due date for rectification of the non-compliance is stated, which is no more than 7 calendar days from the date of issue of the advisory finding.
 - A follow up onsite audit may be required to verify the non-compliance has been rectified. If the non-compliance relates to a minor (documentation) non-compliance then the [Grain and Seed Exports Program](#) (GSEP) is consulted before determining if rectification will require a follow up audit.
 - If the non-compliance cannot be rectified, the establishment will not be approved to export logs to China until all non-compliances identified are rectified in consultation with GSEP.
- are issued in writing by the auditors immediately upon completing the audit
- are provided to GSEP along with the audit report

All other registered establishments requirements apply as per the Guideline: [Audit of plant export registered establishments](#).

Performance standards

Establishment requirements

The following table describes the performance standards and compliance ratings for establishment requirements.

Checklist items	Performance standards – establishment site requirements	Compliance rating	Examples of evidence (guide only)
<p>1.1 Registered Establishment (Treatment facility)</p>	<ul style="list-style-type: none"> • Establishments undertaking fumigation have either a: <ul style="list-style-type: none"> ○ flat, level, hard, sealed surface, such as concrete or bitumen that is impervious to fumigants or ○ flat, level, compacted surface that is tarped to make it impervious. • Establishments using compacted surfaces have gas proof tarps, which are made available at audit. <p>Note: Establishments are responsible for providing gas proof sheets/tarps for the fumigation surface if required.</p> <ul style="list-style-type: none"> • Surfaces are free of debris that might prevent a gas-tight seal or damage tarps. • Hard, sealed surfaces have any cracks sealed. • Large sized gravel that will likely puncture a tarp/sheet or soft surfaces are not suitable. • Compacted surfaces are compacted to the extent that they are not damaged by heavy vehicle traffic or in all weather situations. • Compacted surfaces are compacted to the extent that they do not become soft after rain. • any other site requirements outlined in the relevant Methyl bromide or Sulfuryl fluoride fumigation methodology (adequate space, allow for safe ventilation etc.) are met. 	<p>Pass/fail</p>	<ul style="list-style-type: none"> • Visual inspection

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Checklist items	Performance standards – establishment site requirements	Compliance rating	Examples of evidence (guide only)
	<p>Note: Where mandatory fumigation will be performed in a bulk vessel hold, the initial inspection establishment (if pass audit, they will only have the registered function GLGCN—inspection of logs for China) does not need to meet the hardstand requirement.</p>		
<p>1.2 Registered establishment (log stockpile storage)</p>	<ul style="list-style-type: none"> • Log stockpiles are placed on at least 2 bearers that prevent the logs from directly touching the ground, unless the ground is a sealed surface (bitumen or concrete). • Log stockpiles are spaced apart by at least 1.5 metres so that AOs can safely and adequately inspect all sides of each stockpile. • Log stockpiles to be fumigated are placed on the fumigation facility described in 1.1. • If the fumigation facility is on an unsealed surface, stockpiles being fumigated have a gas-proof tarp placed underneath the stockpile (as well as over the top) to ensure an effective fumigation. 	<p>Pass/fail</p>	<ul style="list-style-type: none"> • Visual inspection
<p>1.3 Establishment maintenance</p>	<ul style="list-style-type: none"> • The site has adequate drainage to prevent buildup of mud and pooling of water. • The establishment occupiers have a site management plan that includes: <ul style="list-style-type: none"> ○ a process for regular checks of site conditions following rain ○ rectification actions when there is water pooling and/or mud. • All log storage areas are level and free of ruts left by machinery and logs. <p>Note: If large ruts are present on the surface of log storage areas, the surface material is unsuitable. Inform RE management that the surface is unsuitable and must be overlaid/replaced with compacted gravel or similar material.</p>	<p>Pass/fail</p>	<ul style="list-style-type: none"> • Visual inspection

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Checklist items	Performance standards – establishment site requirements	Compliance rating	Examples of evidence (guide only)
1.4 Fumigator accreditation	<ul style="list-style-type: none"> The establishment occupier has engaged a fumigator who holds the relevant state fumigation licence. Evidence is provided to the auditor to demonstrate that the fumigator holds the relevant state fumigation licence. 	Pass/fail	<ul style="list-style-type: none"> Online or manual accreditation notification
1.5 Fumigator approval	<ul style="list-style-type: none"> Fumigators (including those providing bulk vessel in-hold fumigation) are listed on the Grain and Seeds Export Program (GSEP) approved fumigator list. <p>Note: Fumigator applicants must have completed department-approved training for the application of methyl bromide or the sulfuryl fluoride stewardship program. Evidence attesting to completion must be provided as part of the initial application.</p> <p>Fumigators registered as a Biosecurity approved arrangement Class 12.1 and 12.2 are considered to have met the training requirements.</p>	Pass/fail	<ul style="list-style-type: none"> Check GSEP Sharepoint list Department on-line list of 12.1/12.2 arrangements
1.6 Authorised Officer requirements	<ul style="list-style-type: none"> The establishment has on site AO(s) with the relevant forest products job function. Alternatively, the establishment has identified AO(s) to provide services. AOs performing inspections of logs to China have been nominated by the establishment and approved by GSEP. 	Pass/fail	<ul style="list-style-type: none"> Establishment to provide AO details Check GSEP Sharepoint list
1.7 Log cleaning - sampled logs in stockpiles	<p>The establishment occupier demonstrates:</p> <ul style="list-style-type: none"> the facilities and the equipment that is used for cleaning logs that are set out on the ground for inspection by the AO where required. log cleaning method/procedure. <p>Note: Cleaning is mandatory for all logs set out for inspection on unsealed surfaces.</p>	Pass/fail	<ul style="list-style-type: none"> Visual inspection

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Fumigator requirements

The following table describes the performance standards and compliance rating for procedures for fumigation treatment providers

Checklist items	Performance standards – fumigators equipment and procedures	Compliance rating	Examples of evidence (guide only)
2.1 Fumigation set up	<p>Fumigator demonstrates via mock demonstration they have appropriate equipment and can explain its use for undertaking:</p> <ul style="list-style-type: none"> • gas dosage monitoring • leak testing, and/or pressure testing, if applicable • drills and equipment for commodity and ambient temperature measurement • snakes to minimise air flow under containers • any other equipment required to undertake fumigations as per appropriate fumigation methodology. 	Pass/fail	<ul style="list-style-type: none"> • Visual assessment • Methyl bromide methodology • Sulfuryl fluoride methodology • Exports process instruction: Inspection of forest products for export
2.2 Fumigation process	<p>Fumigator demonstrates via mock demonstration:</p> <ul style="list-style-type: none"> • the process for determining container suitability, by checking for visible holes or damage • the process for determining if a gas-proof tarp is required under the fumigation enclosure • covering unsealed fumigation areas with a tarp under the target of fumigation • pressure testing if required (demonstration without gas is acceptable) • leak testing of fumigation enclosures when fumigating under tarp (demonstration without gas is acceptable) • the method for placement of monitoring lines (at least 3 monitoring lines per fumigation in all circumstances) and use of fans 	Pass/fail	<ul style="list-style-type: none"> • Visual assessment • Exports process instruction: Inspection of forest products for export

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Checklist items	Performance standards – fumigators equipment and procedures	Compliance rating	Examples of evidence (guide only)																		
	<ul style="list-style-type: none"> fumigation monitoring line requirements as per below <table border="1" data-bbox="602 336 1400 727"> <thead> <tr> <th data-bbox="602 336 1010 432">Fumigation Set-Up</th> <th data-bbox="1010 336 1400 432">Minimum monitoring lines per stockpile</th> </tr> </thead> <tbody> <tr> <td data-bbox="602 432 1010 528">Logs in stockpiles under tarp</td> <td data-bbox="1010 432 1400 528">3 per stockpile plus 1 per 12 metres of stockpile length</td> </tr> <tr> <td data-bbox="602 528 1010 663">Logs in containers (with doors opened) under tarp</td> <td data-bbox="1010 528 1400 663">1 per container with a minimum of 3 lines per fumigation enclosure</td> </tr> <tr> <td data-bbox="602 663 1010 727">Logs in fumigation chambers</td> <td data-bbox="1010 663 1400 727">3 lines per enclosure</td> </tr> </tbody> </table> barrier creation to reduce airflow under containers and log stockpiles the taking of log temperature measurements - sampling rate below (logs of different sizes must be drilled for temperature measurement in all cases) <table border="1" data-bbox="602 935 1400 1350"> <thead> <tr> <th data-bbox="602 935 1010 1031">Treatment Set-Up Type</th> <th data-bbox="1010 935 1400 1031">Minimum Logs Required for Temperature Measurement</th> </tr> </thead> <tbody> <tr> <td data-bbox="602 1031 1010 1094">Tarped log stockpiles</td> <td data-bbox="1010 1031 1400 1094">5 per stockpile</td> </tr> <tr> <td data-bbox="602 1094 1010 1158">1 container under tarp</td> <td data-bbox="1010 1094 1400 1158">3</td> </tr> <tr> <td data-bbox="602 1158 1010 1254">2 containers under tarp</td> <td data-bbox="1010 1158 1400 1254">4 (with at least 2 per container)</td> </tr> <tr> <td data-bbox="602 1254 1010 1350">3-5 containers under tarp</td> <td data-bbox="1010 1254 1400 1350">5 (with at least 1 per container)</td> </tr> </tbody> </table> 	Fumigation Set-Up	Minimum monitoring lines per stockpile	Logs in stockpiles under tarp	3 per stockpile plus 1 per 12 metres of stockpile length	Logs in containers (with doors opened) under tarp	1 per container with a minimum of 3 lines per fumigation enclosure	Logs in fumigation chambers	3 lines per enclosure	Treatment Set-Up Type	Minimum Logs Required for Temperature Measurement	Tarped log stockpiles	5 per stockpile	1 container under tarp	3	2 containers under tarp	4 (with at least 2 per container)	3-5 containers under tarp	5 (with at least 1 per container)		
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Checklist items	Performance standards – fumigators equipment and procedures		Compliance rating	Examples of evidence (guide only)
	6 or more containers fumigated under tarp	At least 1 per container		
	logs in fumigation chamber	3 per enclosure		
	<ul style="list-style-type: none"> the taking of ambient temperature measurements equipment and process for maintaining enclosure temperature above minimum allowable. 			
2.3 Fumigation knowledge	Fumigator demonstrates awareness of fumigation monitoring requirements, including recording times.		Pass/fail	<ul style="list-style-type: none"> Exports process instruction: Inspection of forest products for export Micor

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Authorised Officer requirements

The following table describes the Authorised Officer compliance ratings.

Checklist items	Performance standards – Authorised Officer requirements	Compliance rating	Examples of evidence (guide only)
3.1 Approval requirements	<ul style="list-style-type: none"> AO is listed in the establishment application and recorded against the establishment by GSEP for inspecting logs to China against the establishment. AO met requirements at item 1.6. 	Pass/fail	<ul style="list-style-type: none"> Check GSEP sharepoint list
3.2 Inspection requirements	AO locates and identifies log sampling and inspection requirements.	Pass/fail	<ul style="list-style-type: none"> Exports process instruction: Inspection of forest products for export Exports work instruction: Inspecting forest products for export
3.3 Inspection requirements	AO demonstrates understanding of the different sampling and inspection requirements in relation to level 1 and level 2 inspections.	Pass/fail	<ul style="list-style-type: none"> Exports process instruction: Inspection of forest products for export Exports work instruction: Inspecting forest products for export
3.4 Sampling and inspection	<p>AO demonstrates via mock demonstration sampling and inspection requirements for logs to China, including demonstration of how they:</p> <ul style="list-style-type: none"> inspect and sample logs in stockpiles sample containers for inspection for level 1 and level 2 determine 20% surface of the log apply the 20% inspection requirement (the 20% minimum surface area inspected is representative and spread across each log) 	Pass/fail	<ul style="list-style-type: none"> Exports process instruction: Inspection of forest products for export Exports work instruction: Inspecting forest products for export – (relevant parts of document)

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Checklist items	Performance standards – Authorised Officer requirements	Compliance rating	Examples of evidence (guide only)
	<ul style="list-style-type: none"> ○ inspecting 20% of the surface area in a single area of each log is not sufficient. 		
3.5 Supporting documentation	<p>AO demonstrates understanding of requirements for checking fumigation certificates to ensure they meet instructional material requirements and Micor. For example:</p> <ul style="list-style-type: none"> • recording/monitoring requirements • requirement to include fumigator name and company • requirement to include establishment name or vessel name and IMO number where fumigation was performed • requirement to record every fumigant level reading and temperature reading, not an average of those readings. 	Pass/fail	<ul style="list-style-type: none"> • Exports process instruction: Inspection of forest products for export • Exports work instruction: Inspecting forest products for export Micor
3.6 Inspection requirements	<p>AO demonstrates knowledge that:</p> <ul style="list-style-type: none"> • any log(s) touching unsealed surfaces fail inspection. • logs stockpiles on unsealed surfaces must be placed on at least 2 bearers. • logs stockpiles on 2 bearers that are still touching unsealed ground must fail inspection—establishment needs to take appropriate action to prevent logs from directly touching the ground or not use such areas to store log stockpiles. • compacted soil or gravel are considered unsealed surfaces. 	Pass/fail	<ul style="list-style-type: none"> • Exports work instruction: Inspecting forest products for export

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Related material

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

- Methyl bromide fumigation methodology
- Sulfuryl fluoride fumigation methodology
- Guide to performing QPS fumigations with methyl bromide
- Departmental Policy: *Management of plant export registered establishments*
- Guideline: *Administering applications for plant export registered establishments*
- Guideline: *Audit of plant export registered establishments*
- Guideline: *Supporting documents for plant exports*
- Exports process instruction: *Inspection of forest products for export*
- Exports work instruction: *Inspecting forest products for export*

The following related material is available on the department's [website](#):

- Manual of Importing Country Requirements (Micor) – Logs to China

Contact information

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Document information

The following table contains administrative metadata.

Instructional Material Library document ID	IMLS-9-9366
Instructional material owner	Director, Grain and Seed Exports
Risk rating	Medium
Review period	Due for review within 3 years of the most recent approved date.

Version history

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

Version	Date published	Date last approved	Review type	Summary of review
1.0	04/06/2024	04/06/2024	New document	First publication of this reference for commencement of policy for export of logs to China.
2.0	13/08/2024	13/08/2024	Major change	Updated the fumigator requirements.

Appendix A: Definitions

The following table defines terms used in this document.

Term	Definition
Activity categories	Requirements from the Methyl bromide fumigation methodology that have been grouped by activity.
Checklist item	Requirements under each activity category that have been grouped by function and assigned a non-compliance rating/s.
Corrective action request (CAR)	A formal notification from the department requesting the cause of non-conformance with requirements to be eliminated, with the objective of preventing reoccurrence.
Documented system	A written process or procedure that defines the steps in a process and who is responsible for those steps. This may also include records that are used to confirm the process is being followed.
Hardstand	A hard, impervious surface that eliminates risk of contamination from soil and termite infestation. Impervious surfaces improve effectiveness of fumigation treatment.
Non-compliance rating	Ratings of minor, major and critical applied to a non-compliance to indicate the degree of seriousness.
Performance standards	A benchmark derived from legislation and departmental requirements against which actual performance is measured.