



Australian Government

**Department of Agriculture,
Fisheries and Forestry**

Performance standards — Establishment continuation audits for log exports to China

Purpose of this document

This document outlines the performance standards that registered establishments must meet to be considered suitable to continue log exports (with and without bark) to China 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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Supporting material

This document must be read in line with the:

- Exports policy: [Management of plant export registered establishments](#)
- Exports process instruction: [Audit of plant export registered establishments](#)
- Exports process instruction: [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.](#)

Continuation audit

Purpose of the audit

The aim of ongoing or 'continuation' audits of establishment processes for the exports of logs with and without bark to China is to assess key establishment criteria, ensuring continuing compliance. 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 continue log exports to China.

Corrective actions

If a non-compliance is detected during audit, the auditor issues a corrective action request. Each corrective action request:

- 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 corrective action request.
 - A follow up onsite audit may be required to verify the non-compliance has been rectified.
 - If the non-compliance cannot be rectified, the establishment will be suspended from exporting logs to China until all non-compliances identified are rectified in consultation with GSEP.
- is issued in writing by the auditors immediately upon completing the audit
- is provided to GSEP along with the audit report.

All other registered establishment requirements apply as per the Exports process instruction: [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)
1.1 Registered Establishment (Treatment pad)	<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. <ul style="list-style-type: none"> • Establishments using compacted surfaces have gas proof tarps, which are available at audit. <p>Note: Establishments are responsible for providing gas proof sheet/tarps for the fumigation surface if surface is not impervious.</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. 	Critical	<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 (which 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 pad described in 1.1. • If the fumigation pad 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. 	Critical	<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>	Critical	<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. 	Critical	<ul style="list-style-type: none"> Online or manual accreditation notification
1.5 Fumigator approval	<ul style="list-style-type: none"> Fumigator(s) (including those providing bulk vessel in-hold fumigation) are listed on the Grain and Seeds Export Program (GSEP) approved fumigator list for logs to China. Fumigator(s) are listed on the GSEP list against the establishment specifically. This excludes fumigators who only perform bulk vessel in-hold fumigations. <p>Note: Fumigator(s) nominated for fumigating logs to China cannot perform fumigations for logs to China until after they have passed audit and are confirmed by GSEP as being approved.</p>	Critical	<ul style="list-style-type: none"> Check GSEP SharePoint list
1.6 Authorised Officer requirements	<ul style="list-style-type: none"> AO(s) performing inspections of logs to China are approved by GSEP for inspecting logs to China. AO(s) performing inspections of logs to China have the relevant forest products job function. Any new AO(s) not previously approved by GSEP for inspecting logs to China have been nominated to GSEP for audit by establishment occupiers. <p>Note: Newly appointed AO(s) with the forest products job function need to contact GSEP before performing inspections of logs to China.</p>	Critical	<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. 	Critical	<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)
	Note: Cleaning is mandatory for all logs set out for inspection on unsealed surfaces.		

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 Approval requirements	<ul style="list-style-type: none"> Fumigator is recorded as approved by GSEP for conducting fumigation of logs to China on the GSEP list. Fumigator (unless they are only performing bulk vessel in-hold fumigation) are listed against the establishment specifically. 	Critical	<ul style="list-style-type: none"> Check GSEP SharePoint list
2.2 Fumigation set up	<p>Fumigator shows via demonstration fumigation they have appropriate equipment and 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 tarped containers and tarped stockpiles any other equipment required to undertake fumigations as per appropriate fumigation methodology. 	Critical	<ul style="list-style-type: none"> Visual assessment Methyl bromide methodology Sulfuryl fluoride methodology Exports process instruction: Inspection of forest products for export
2.3 Fumigation process	<p>Fumigator demonstrates:</p> <ul style="list-style-type: none"> the process for determining container and/or tarp suitability, by checking for visible holes or damage 	Critical	<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"> • 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 • method and equipment (e.g. snakes) for sealing fumigation enclosures • pressure testing if required (demonstration without gas is acceptable) • leak testing of fumigation enclosures when fumigating under tarp • the method for placement of monitoring lines (at least 3 monitoring lines per fumigation in all circumstances) and use of fans • fumigation monitoring line requirements as per below <table border="1" data-bbox="600 826 1402 1217"> <thead> <tr> <th data-bbox="600 826 1010 922">Fumigation Set-Up</th> <th data-bbox="1010 826 1402 922">Minimum monitoring lines per stockpile</th> </tr> </thead> <tbody> <tr> <td data-bbox="600 922 1010 1023">Logs in stockpiles under tarp</td> <td data-bbox="1010 922 1402 1023">3 per stockpile plus 1 per 12 metres of stockpile length</td> </tr> <tr> <td data-bbox="600 1023 1010 1158">Logs in containers (with doors opened) under tarp</td> <td data-bbox="1010 1023 1402 1158">1 per container with a minimum of 3 lines per fumigation enclosure</td> </tr> <tr> <td data-bbox="600 1158 1010 1217">Logs in fumigation chambers</td> <td data-bbox="1010 1158 1402 1217">3 lines per enclosure</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • barrier creation to reduce airflow under containers and log stockpiles 	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		
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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"> 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="600 408 1402 983"> <thead> <tr> <th data-bbox="607 413 1016 509">Treatment Set-Up Type</th> <th data-bbox="1016 413 1395 509">Minimum Logs Required for Temperature Measurement</th> </tr> </thead> <tbody> <tr> <td data-bbox="607 509 1016 568">Tarped log stockpiles</td> <td data-bbox="1016 509 1395 568">5 per stockpile</td> </tr> <tr> <td data-bbox="607 568 1016 627">1 container under tarp</td> <td data-bbox="1016 568 1395 627">3</td> </tr> <tr> <td data-bbox="607 627 1016 727">2 containers under tarp</td> <td data-bbox="1016 627 1395 727">4 (with at least 2 per container)</td> </tr> <tr> <td data-bbox="607 727 1016 828">3-5 containers under tarp</td> <td data-bbox="1016 727 1395 828">5 (with at least 1 per container)</td> </tr> <tr> <td data-bbox="607 828 1016 924">6 or more containers fumigated under tarp</td> <td data-bbox="1016 828 1395 924">At least 1 per container</td> </tr> <tr> <td data-bbox="607 924 1016 983">logs in fumigation chamber</td> <td data-bbox="1016 924 1395 983">3 per enclosure</td> </tr> </tbody> </table> <ul style="list-style-type: none"> the taking of ambient temperature measurements equipment and process for maintaining enclosure temperature above minimum allowable. 	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)	6 or more containers fumigated under tarp	At least 1 per container	logs in fumigation chamber	3 per enclosure		
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Tarped log stockpiles	5 per stockpile																
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2.4 Fumigation knowledge	Fumigator demonstrates awareness of fumigation monitoring requirements, including recording times.	Critical	<ul style="list-style-type: none"> Exports process instruction: Inspection of forest products for export Micor 														
2.5 Applying the fumigant	<ul style="list-style-type: none"> Supply pipes are free of leaks and sealed once the fumigant is applied. 	Critical	<ul style="list-style-type: none"> Methyl bromide fumigation methodology 														

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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"> • The fumigant (if using methyl bromide) is vaporised in line with Section 6.1 of the Methyl bromide fumigation methodology. • The circulation system is operating during the application of the fumigant <ul style="list-style-type: none"> ○ heaters available if required to ensure ambient does not go below minimum allowable temperature. • Scales used to measure the dose applied have been calibrated at least annually and have an accuracy of +/-0.1kg. 		<ul style="list-style-type: none"> • Sulfuryl fluoride fumigation methodology
2.6 Treatment	Fumigator: <ul style="list-style-type: none"> • ensures the correct treatment schedule is applied as per Micor. • has records that demonstrate prescribed fumigant starting concentration, retention rates and time periods have been met. 	Critical	<ul style="list-style-type: none"> • Methyl bromide fumigation methodology • Sulfuryl fluoride fumigation methodology
2.7 Treatment	Fumigator understands the fumigation exposure period has only started when: <ul style="list-style-type: none"> • all concentration readings are equal to, or above, the standard concentration • equilibrium has been reached (equilibrium is shown to be correctly calculated). 	Critical	<ul style="list-style-type: none"> • Methyl bromide fumigation methodology • Sulfuryl fluoride fumigation methodology
2.8 Equipment maintenance	<ul style="list-style-type: none"> • Instruments used for measuring fumigant concentrations are fit for purpose and in good working order. • Instruments for measuring fumigant concentrations are calibrated and/or serviced according to manufacturers' instructions. • Instruments are fitted with any filters required by the manufacturer. <ul style="list-style-type: none"> ○ Filters are replaced as per manufacturer instructions. 	Critical	<ul style="list-style-type: none"> • Methyl bromide fumigation methodology • Sulfuryl fluoride fumigation methodology

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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">• Copy of the user manual for all instruments is available and instruments are used according to them.		

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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 recorded as approved by GSEP for inspecting logs to China. AO met requirements at item 1.6. <p>Note: Newly appointed AO(s) with the forest products job function need to contact GSEP before performing inspections of logs to China.</p>	Critical	<ul style="list-style-type: none"> Check GSEP SharePoint list
3.2 Inspection requirements (logs bulk into containers)	<p>For empty container inspections, AO:</p> <ul style="list-style-type: none"> confirms all containers being loaded with logs have passed empty container inspection at the non-consumable level beforehand understands to look for damage to containers that may reduce fumigation efficacy/allow product reinfestation. 	Critical	<ul style="list-style-type: none"> Exports process instruction: Inspection of forest products for export
3.3 Inspection requirements	AO locates and identifies log sampling and inspection requirements.	Critical	<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 Inspection requirements	AO demonstrates understanding of the different sampling and inspection requirements in relation to level 1 and level 2 inspections.	Critical	<ul style="list-style-type: none"> Exports process instruction: Inspection of forest products for export Exports work instruction: Inspecting forest products for export

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Checklist items	Performance standards – Authorised Officer requirements	Compliance rating	Examples of evidence (guide only)
3.5 Sampling and inspection	AO demonstrates sampling and inspection requirements for logs to China, including demonstration of how they: <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) <ul style="list-style-type: none"> ○ inspecting 20% of the surface area in a single area of each log is not sufficient. 	Critical	<ul style="list-style-type: none"> • Exports process instruction: Inspection of forest products for export • Exports work instruction: Inspecting forest products for export
3.6 Supporting documentation	AO demonstrates understanding of requirements for checking fumigation certificates to ensure they meet instructional material requirements and Micor. For example: <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. 		<ul style="list-style-type: none"> • Exports process instruction: Supporting documents for plant exports • Exports work instruction: Inspecting forest products for export • Micor
3.7 Inspection requirements	AO demonstrates knowledge that: <ul style="list-style-type: none"> • any log(s) touching unsealed surfaces must fail inspection. • logs on unsealed surfaces must be placed on at least 2 bearers. • logs 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. 	Critical	<ul style="list-style-type: none"> • Exports work instruction: Inspecting forest products for export

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Checklist items	Performance standards – Authorised Officer requirements	Compliance rating	Examples of evidence (guide only)
	<ul style="list-style-type: none"> • compacted soil or gravel are considered unsealed surfaces. 		

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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
- Exports policy: *Management of plant export registered establishments*
- Exports process instruction: *Audit of plant export registered establishments*
- Exports process instruction: *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

Grain and Seed Exports Program: grain.export@aff.gov.au

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	20/11/2024	20/11/2024	New document	First publication of this reference for commencement of policy for export of logs to China.

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.