

# Member Update

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**TOPIC: Meeting Import Country Quarantine Requirements**

*DISTRIBUTION: GTA Members – primary contact list. Please circulate to all appropriate internal parties.*

## 1. Key Points

To provide information to Grain Trade Australia Ltd (GTA) members and to remind them of the importance of continued **compliance of export cargo consignments meeting the quarantine phytosanitary requirements of the importing country.**

Meeting market quarantine requirements, and any Australian regulations, is mandatory for all prescribed grain exports. A “prescribed grain export” requires a Department of Agriculture, Fisheries and Forestry (DAFF) issued phytosanitary certificate for it to be legally exported.

As outlined in the grain industry Code of Practice “No grain can be loaded unless the quality/quarantine status is known”. Failure to comply with the importing country requirements as listed in the DAFF Manual of Importing Country Requirements ([Micor](#)) can have dire consequences for the exporter and can impact Australia’s reputation as a trusted trading nation. It is **important grain exporters understand the certification process and the role of Micor** and refer to it whenever considering export sales to ensure it is possible to comply with the importing country requirements.

Similarly, it is important for GTA members to support the Authorised Officer (AO) role and the unique status they have as a representative of DAFF. GTA members that export grain are reminded that the exporter and the Export Registered Establishment (ERE) are responsible to ensure the commodity being exported meets all the requirements prior to presenting to the AO for inspection. The AO inspection is not a quality assurance process for exporters.

## 2. Background

Australia exports grain to over 90 countries. Each import country’s government **establishes its own quarantine requirements** that all imports must meet. DAFF has regulations for exports to ensure those import requirements are met for every prescribed grain consignment.

Importing country requirements regularly differ from GTA Trading Standards and bulk handling receival standards.

As outlined in the industry Code of Practice for the management of grain along the supply chain, the Australian grain industry implements a range of systems and processes prior to outturn to assist this export task:

- As market quarantine requirements vary, in most cases, as grain is generally traded as a bulk commodity, it is not practical for grain to be received from grain producers and segregated based on an individual import country or the customers’ specific contractual requirements.
- Australia has developed a system of Grain Trading Standards that reflect the quality and quarantine specifications of the majority of our export markets. **It is not practical to reflect all market requirements in these Trading Standards**, given the breadth and variations in market requirements that apply. The Trading Standards are often applied at receipt of grower’s grain, creating segregations for each commodity based on the grade. In general, these grades are considered suitable for many markets.

- Each customer's quality requirements vary. The quarantine requirements of each export country likewise vary. As markets may change, or the market may not be known at the point of receipt, key to meeting market specifications is knowledge of those contractual and quarantine requirements prior to grain movement. A number of sources are utilised to understand those quarantine requirements, with the main system being the DAFF Micor.
- Data on the quality and quarantine status of grain received and segregated is obtained. Where additional information is needed to meet a market's requirement, further sampling and testing post-receipt, often involving a laboratory analysis, may need to occur. Key to this task is obtaining and the analysis of a representative sample from that storage.

When grain is sold to an export destination **the commercial contract will outline the contract quality specifications**. In addition, in many instances, the import country government quarantine requirements may be documented or listed on an Import Permit and listed in the DAFF Micor system. These items often include prohibited pests and weed seeds, or specific chemical treatments required for that consignment. These requirements may not be specified on the commercial contract.

### 3. The Export Certification Process

The export task involves a mix of commercial and regulatory activities, following the above activities being undertaken.

As outlined in the Export Control Act 2020, Australia utilises a three staged process as part of its regulatory system to ensure exports comply with Australian and overseas regulatory requirements:

- Exports may only occur at approved premises, being referred to as Export Registered Establishments (ERE). An ERE must comply with a range of requirements, key issues being maintaining hygiene of the premises and ensuring the integrity of the product to be loaded is maintained.
- Prior to loading, the empty vessel to be loaded (bag, container, bulk vessel) must be inspected to ensure cleanliness and it is fit to load, and freedom from a range of contaminants that may impact on the product loaded.
- It is **the exporter and the ERE responsibility to ensure grain is presented to the AO that meets importing country requirements**. During loading, grain is inspected at a regulated rate (2.5 litres per 33 tonnes of grain) to ensure it meets all those quarantine regulations.

These three tasks are undertaken by DAFF trained and approved AOs. AOs are appointed as Australian Government officials (public officials) under the Export Control Act 2020. An AO can perform a range of export functions on behalf of DAFF and on occasions may be an employee of an ERE or an employee of the exporter. In all cases, they are responsible to DAFF, not the ERE or exporter (ie., Deeded to the Australian Commonwealth government).

Upon completion of loading and confirmation that the grain loaded complies with plant export laws & regulations, various documents are submitted as confirmation the commodity exported meets the importing country requirements. Only then can DAFF provide a Phytosanitary (plant health) certificate as evidence that the grain loaded:

- Has passed a phytosanitary inspection by a DAFF representative – normally an AO.
- Complies with importing country requirements and with the Export Control Act 2020, and subordinate legislation.

The AO role is critical to the performance of the export grain industry as they play an important role in ensuring the biosecurity free risk, safe and trusted export of grain from Australia, helping to maintain the reputation as a trusted exporter of quality goods. The AO, the exporter and the ERE that loads the grain all have a role to play in this task to ensure the consignment is compliant.

It is important to understand the quarantine requirements may differ based on the importing country:

- Micor is a guide only, with the exporter responsible for obtaining the final quarantine requirements of that country.
- An Import Permit must be obtained where required. The Import Permit overrides any other requirements.
- Protocols with some markets for particular commodities stipulate further requirements, such as limits on specific pests such as weed seeds and insects.
- Different end-uses of grain may require different quarantine rules to be applied at export.

Where stipulated in Micor, industry must ensure any supporting documents provided to an AO prior to or during loading are available and accurately reflect that cargo:

- Any samples obtained and used for further analysis must be representative of the cargo. They must be obtained using approved sampling procedures.
- Subsequent testing of samples and certification must be done by an approved or certified laboratory.
- Where specific stock selection has been required, or other export certification is needed, exporters and the ERE as relevant, must only provide such documentation based on supporting evidence and compliance with those requirements.
- An AO must only then sign off that the consignment meets those regulations. This may include the AO recording any contaminants on the assessment documentation.

#### **4. Further Information**

For further information please contact GTA at [admin@graintrade.org.au](mailto:admin@graintrade.org.au)