

Packhouse audit and record keeping requirements

Introduction

The overarching audit framework and principles of the Plant Export Operations branch are outlined in [Guideline: Audit of Plant Export Operations](#).

Information on audit processes can be found in [Guideline: Audit of Horticulture Export Accredited Properties](#).

Performance standards

Accredited properties must be audited for compliance against a set of performance standards derived from the standards outlined in the Guideline: Management of horticulture export accredited properties, relevant legislation and importing country requirements.

Performance standards are organised into groups known as activity categories. Each activity category has a number of checklist items that must be assessed for compliance.

Packhouse activities

The activities for packhouses are:

- general requirements
- traceability and security
- hygiene and pest control
- packaging and labelling.

Audit types

The table below lists audit types for accredited properties.

Pre-season audit

- New horticulture export properties applying for accreditation and previously accredited properties found non-compliant in the previous export season must be audited to assess their ability to comply with the performance standards and importing country requirements before accreditation is approved for the property.
- The manager of the property seeking accreditation, as well as any nominated individuals such as crop monitors, must be present at the audit.
- Accredited properties audited pre-season may be subject to a further audit once accredited in-season dependent on the outcome of the audit.

Notes:

- An alternative audit frequency policy is in place for New Zealand.
- Due to logistics an existing accredited property maybe audited pre-season at the discretion of AAG.

| Audit type | Conducted | Frequency | Announced/ unannounced |
|------------------|---------------------------------|--|--------------------------|
| Pre-season audit | After application | Once before export season | Announced |
| In-season audit | During the accreditation period | Once each export season Note: The frequency of audit may be higher, depending on noncompliance. | Announced or unannounced |

Advisory findings

- If a non-compliance is detected during a pre-season audit, the auditor must issue an advisory finding. Each advisory finding must:
 - describe the identified non-compliance
 - state the due date for rectification of the non-compliance, which is no more than seven calendar days from issue of the advisory finding
 - be issued in writing by auditors immediately upon completing the audit.

In-season audit

Process for pre-season audit

A table outlining the process for conducting a pre-season audit of a property can be found in [Guideline: Audit of horticulture export accredited properties](#).

Accredited properties who were found compliant in the previous export season will be subject to an audit in-season. Any evidence of non-compliance in the export supply chain may trigger an additional audit of the accredited property in the current export season or prior to the next export season.

Notes:

- An alternative audit frequency policy is in place for New Zealand (all commodities).
- Due to logistics an existing compliant property may be audited pre-season at the discretion of AAG.

Non-compliance ratings

Checklist items in the performance standards are assigned one or more potential non-compliance ratings including minor, major and critical. Where an accredited property is deemed non-compliant against a checklist item the auditor will select a non-compliance rating from those listed, taking into account the context and extent of the non-compliance and the definition of minor, major and critical.

Where an auditor believes the non-compliance should be rated a level that is not listed for that checklist item, they may assign an alternate non-compliance rating, for example, where an item states major and critical as the non-compliance rating options and the non-compliance identified fits with the definition of minor the auditor may list the non-compliance as minor.

Issuing Corrective Action Requests

- If a non-compliance is detected during an in-season audit, the auditor must issue a Corrective Action Request (CAR) per checklist item.
- A timeframe for closing out a CAR must be specified by the auditor and be no longer than:
 - 28 calendar days for minor CARs
 - 14 calendar days for major CARs
 - 7 calendar days for critical CARs.

- Prior to the 'deadline for rectification', and at the request of the manager, deadlines for rectification can be extended twice, each for a period equal to the original timeframe.

Important:

Requests for extension must be made in writing to AAG to the attention of the auditor who conducted the audit.

When a critical non-compliance is identified

When an auditor identifies a critical non-compliance, the audit result must be referred to PIAC, who will determine how to escalate the issue.

Further action to address the non-compliance and audit result is for decision by PIAC and may include:

- downgrading the CAR
- imposing a timeframe for a follow-up audit or increased audit schedule
- variation, suspension or revocation of accreditation
- referral to the department's Enforcement and Sanctions Branch.

Suspension or revocation of the accredited property by the department

Non-compliance may constitute grounds for the suspension or revocation of a property's accreditation without liability to the department as outlined in the [Guideline: Management of horticulture export accredited properties](#).

Audit report

The auditor must produce an audit report upon completion of the audit and issue this to the property within 10 working days of completion.

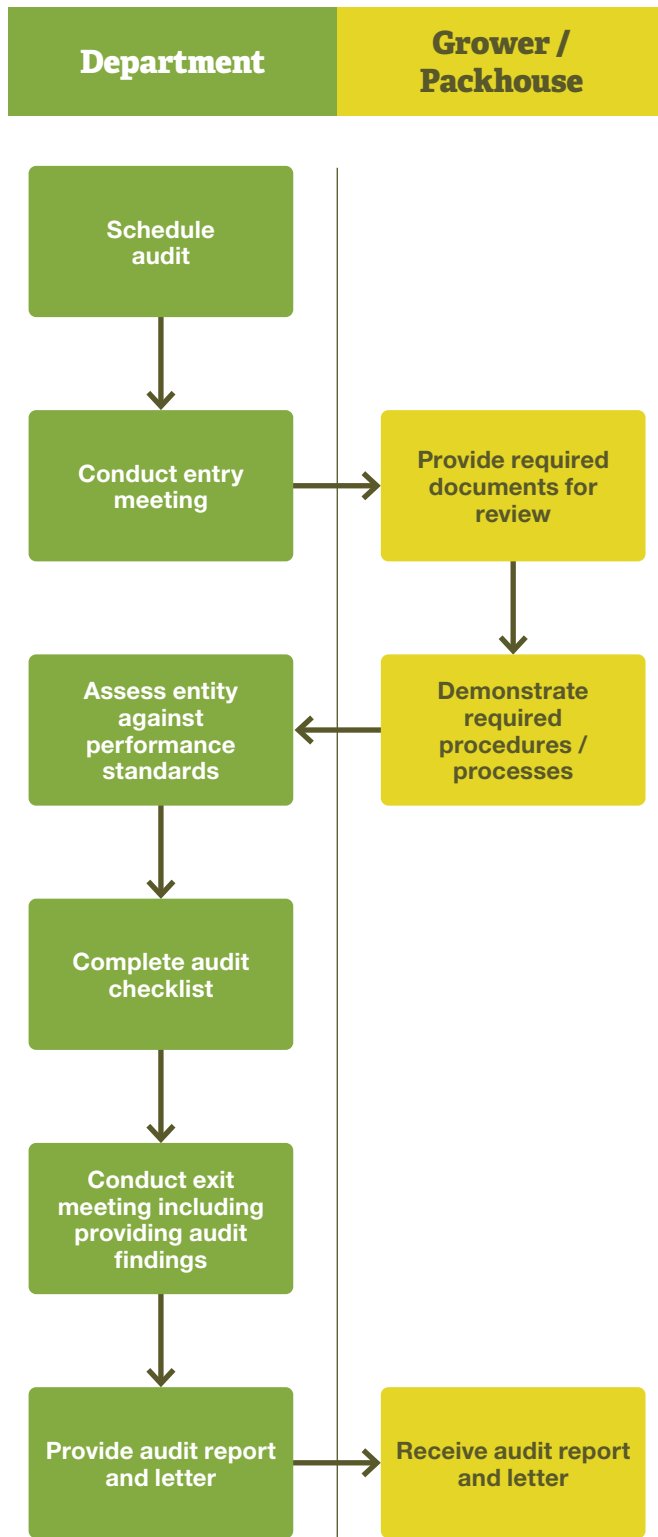
Process for in-season audit

A table outlining the process for conducting an in-season audit of a property can be found in [Guideline: Audit of horticulture export accredited properties](#).

Record keeping

Accredited properties, AAG and HEP must retain documentation in relation to audits, accreditation and export certification for a period of at least two years.

The audit process



Packhouse responsibilities

Packhouse managers must maintain evidence of the property's accreditation and comply with all managers responsibilities under the Export Control (Plants and Plant Products) Rule 2021.

Packhouses must meet the below requirements (as outlined in [Guideline: Management of Horticulture Export Accredited Properties](#)).

Training

- Packhouses must have a documented system to ensure staff receiving, inspecting, storing or moving export horticulture commodities are trained. The training should cover the protocol/workplan requirements applicable to their role.
- As part of the system, the packhouse must have a training program in place and includes:
 - training material covered
 - frequency of training
- Training records must be retained for two years and contain the following information:
 - details of the training undertaken
 - date the training was completed
 - name of the individual that was trained

Hygiene

- Packhouses must have documented systems for pest control, waste removal and cleaning programs to minimize the risk of contaminating product. As part of the system the packhouse must have documented programs in place and include:
 - frequency of cleaning, pest control and waste removal activities
 - methods used in cleaning, pest control and waste removal activities
 - areas and equipment to be cleaned
 - location of pest control stations (rodent bait station map)
- maintain records of pest control, waste removal and cleaning activities for two years
- ensure any rotted, damaged, or infested product is regularly removed from the packhouse
- clean their premises regularly, including a start and end of season clean, to ensure they are maintained in a hygienic manner
- clean and inspect equipment and machinery used in handling the product to manage the risk of cross contamination to export product.

Traceability

- Packhouses must have a documented system to ensure traceability and movement of goods from an accredited block through to the packhouse and to the next establishment receiving product. As part of the system, the packhouse must have a traceability program in place

and includes how the packhouse tracks movement of product:

- from an accredited block to receipt and through storage and loadout
- to the next receiving establishment for inspection and/or treatment in accordance with the Guideline: Maintenance of phytosanitary security for export horticulture exports.

Maintaining integrity

- Ensure the integrity of goods being prepared at the packhouse through measures:
 - in place to minimize the risk of infestation or contamination. For example, effective hygiene, waste removal and pest control measures, security measures for goods being prepared for export, such as physical barriers and isolation by distance.
 - to keep export goods that have acquired a phytosanitary status separate from goods that haven't. For example, physical barriers (packaging, separate storage areas), isolation by distance and effective traceability systems.
 - in place to minimize the risk of substitution (switching goods). For example, effective traceability systems and secure packaging/labelling of goods.
 - to maintain phytosanitary status to meet the phytosanitary security requirements as per the [Guideline: Maintenance of phytosanitary security for export horticulture exports](#).

Trade description

- When a trade description is applied at the packhouse an adequate and accurate trade description must be applied to all horticulture consignments. The trade description may be applied as pallet labels where it is clear that single types of product are unitized.
- Trade description requirements may be met through the application of one or more trade descriptions to a consignment. The information in these trade descriptions must not be inconsistent or false.
- It must:
 - be accurate and adequate, by containing enough information to enable an AO and the importing country to correctly and readily identify the goods
 - not be ambiguous or unclear
 - be set out in prominent and legible characters
 - be securely attached to the consignment
 - satisfy any importing country requirements

Packaging requirements

- Packages and/or pallets must be labelled (as a minimum) with the name of the product, accredited block number and accredited packhouse number.
- Packages must be labelled with any other additional information as required by the protocol
- Materials used in the final packaging of horticulture export product, such as cartons, must be:

- new (or, if used, must be reconditioned for each subsequent use to ensure it meets all other packaging requirements)
- clean
- appropriate for the plant or plant product that have been or will be packed in them
- sufficiently strong to withstand the handling ordinarily incurred by the materials during transit to maintain the phytosanitary security of the consignment
- free from pests and contaminants
- compliant with any specific importing country requirements
- compliant with the [International Standards for Phytosanitary Measures \(ISPM\) 15 – for wood packaging material](#)

Note:

Packaging requirements do not apply to bins/lugs used for the movement of product from the farm to the packhouse.

Performance standards for Packhouses

The manager of the packhouse must ensure the following performance standards are met. The performance standards are outlined in [Reference: Performance Standards for Packhouses](#).

Further Assistance

Any questions regarding audit Performance Standards should be directed to Horticulture Exports Program (HEP). HEP can be contacted at horticultureexports@agriculture.gov.au.

Packhouse Application Details

For a new packhouse application, the following supporting documentation must also be supplied:

- a general floor plan
- a floor plan of processing areas, showing all permanent fixtures and the layout of equipment
- a product flow chart and main features of the product flow
- documented hygiene and waste removal program
- documented pest control program
- documented traceability program
- documented training program.

Note:

The records associated with each of the above listed programs are not required at the time of application. Refer to the packhouse performance standards within [Guideline: Maintenance of phytosanitary security for horticulture exports](#) for what is required to be included in the relevant documented program.

Any questions regarding audit Performance Standards should be directed to Horticulture Exports Program (HEP). HEP can be contacted at HorticultureExports@agriculture.gov.au.



Avocados Australia

Unit 13, Level 1, Fresh Centre,
385 Sherwood Road, Rocklea, Q 4106
PO Box 134, Brisbane Market Q 4106

Ph: +61 7 3846 6566

Email: admin2@avocado.org.au

Web: www.avocado.org.au



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