

Grower & Packer 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 and crop monitors 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.

Farm activities

The activities for farms are:

- general requirements
- pest and disease control
- harvest requirements.

Crop activities

The activities for crop monitors are:

- training
- record keeping.

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.

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

Notes:

An alternative audit frequency policy is in place for New Zealand.

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.

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](#).

In-season audit

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.
- 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](#).

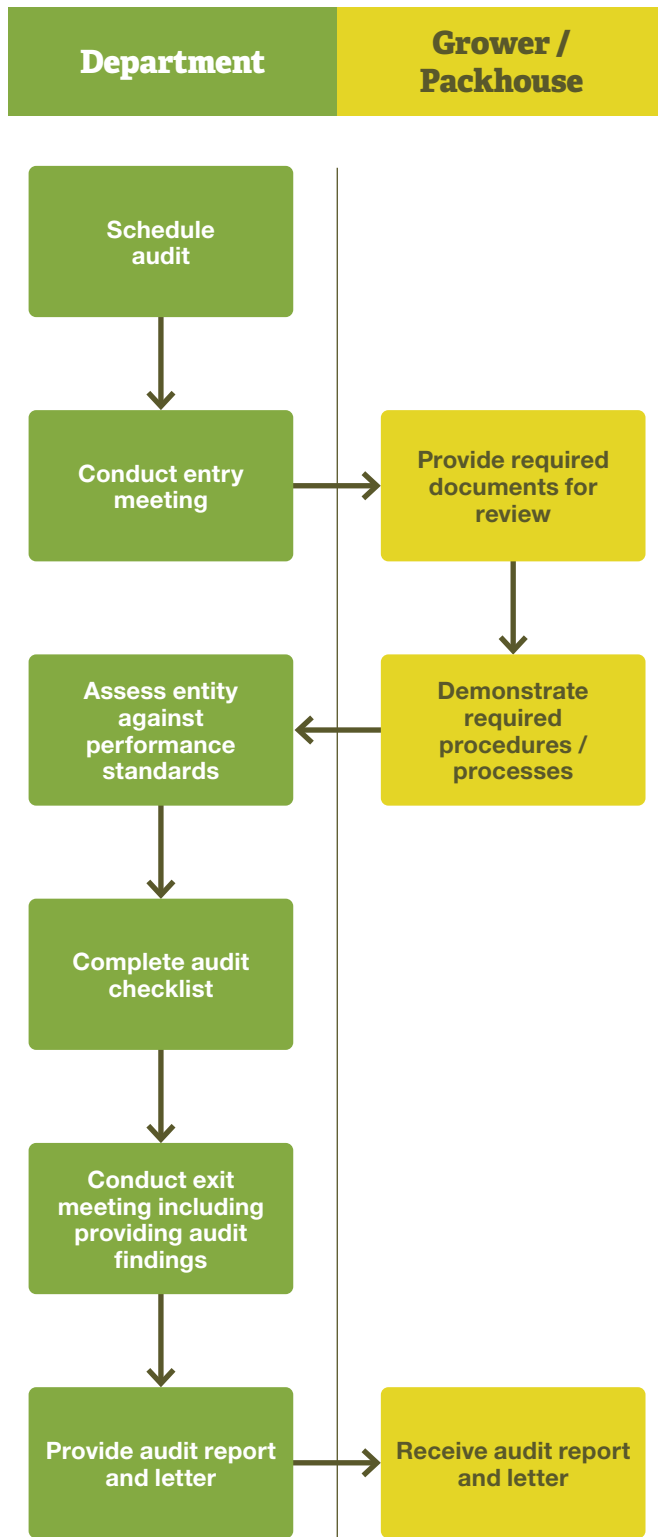
Audit report

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](#).

The audit process



Farm manager responsibilities

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

Farm managers must meet the below requirements (as outlined in **Guideline: Management of Horticulture Export Accredited Properties** – agriculture.gov.au/export/controlled-goods/plants-plant-products/plantexportsmanual#accredited-properties).

Training

- Staff, including pickers, must be trained and aware of the relevant importing country requirements as it relates to their role.
- Records of training must be maintained.

Note:

Training may be in the form of an induction program, a demonstration of procedures to follow or what to look for when picking or any other good agricultural practice.

Pest and disease control

- Preventative and protective measures against pests and diseases must be implemented.
- As part of the measures, records must be maintained and cover the growing season, including harvest.
- Records must be available for 2 years for the following:
 - farm hygiene practices (including pruning, weed control, management of abandoned blocks within the accredited farm)
 - crop monitoring by an approved crop monitor
 - chemical control
 - biological control (if applied)
 - other control methods.

Crop monitoring

Farm managers must:

- use a department approved crop monitor. Any person who has successfully completed the crop monitor training course is considered a 'department approved crop monitor'. Crop monitors will be audited for compliance at the relevant accredited property audit.
- Register your crop monitor on LearnHub. Email your first and last name, preferred email address and avocado as the commodity you wish to conduct training to horticulturetraining@aff.gov.au
- ensure any required trapping programs, fruit or field surveys are conducted by the approved crop monitor.
- undertake appropriate remedial action when a pest or disease of concern to the importing country is detected (as per the workplan, which can be accessed through MICOR at <https://micor.agriculture.gov.au>)
- ensure that follow-up checks by the approved crop monitor are undertaken to confirm the efficacy of the remedial action.
- Maintain records for the above activities for two years.

Note:

Remedial action can range from increased monitoring to the application of a chemical treatment depending on the importing country's requirements for that pest.

Chemical control

- Chemical treatments must be registered with the Australian Pesticides and Veterinary Medicines Authority (APVMA) for the pest or disease being targeted, or used under a minor use or emergency use permit.
- Chemical applications must comply with any state and Commonwealth legislation and be in keeping with the import country requirements. Please download the FREE AAL MRL App to keep up to date with the import country MRL requirements. Visit the BPR go to "Export" then "Maximum residue limits": <https://avocado.org.au/best-practice-resource/export/maximum-residue-limits/>
- A spray diary and records must be kept and include:
 - application date
 - name of product
 - concentration/application rate
 - accreditation number of the farm or blocks treated or a system to link the identified treatment area to the accredited block numbers
 - name of person who conducted the treatment.

Detection of pests of concern

As required by the protocol, if a pest of concern to the importing country is found, the grower must notify the Horticulture Exports Program (HEP) immediately. HEP can be contacted at horticultureexports@agriculture.gov.au.

Harvest requirements

Farm managers must:

- maintain pest and disease controls and records during harvest.
- Record the commencement and completion of harvest for the accredited property.
- have a documented system that demonstrates the traceability of product from accredited blocks whilst on farm and during transport to the packhouse
- provide traceability information to the packhouse on delivery
- not comingle product from accredited blocks with product from non-accredited blocks
- maintain all equipment, including bins, in a hygienic manner
- maintain the phytosanitary security of goods, where required. In line with the work plan you must segregate exports for Japan and maintain phytosanitary security of the product. Guidance can be found in [Maintenance of phytosanitary security for horticulture exports at agriculture.gov.au/export/controlled-goods/plants-plant-products/plantexportsmanual#phytosanitary-security](https://agriculture.gov.au/export/controlled-goods/plants-plant-products/plantexportsmanual#phytosanitary-security)

Performance Standards for farms

The manager of the farm must ensure that the performance standards are met. The performance standards are outlined in [Performance Standards for Farms – agriculture.gov.au/export/controlled-goods/plants-plant-products/plantexportsmanual#accredited-properties](https://agriculture.gov.au/export/controlled-goods/plants-plant-products/plantexportsmanual#accredited-properties)).

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.

Crop Monitor responsibilities

Crop monitors must meet the below requirements as outlined in [Guideline: Management of Horticulture Export Accredited Properties – agriculture.gov.au/export/controlled-goods/plants-plant-products/plantexportsmanual#accredited-properties](https://agriculture.gov.au/export/controlled-goods/plants-plant-products/plantexportsmanual#accredited-properties)). Crop monitors must:

- know the pests of concern to the relevant importing countries and how to identify them in-field.
- report the results of their monitoring activities to the farm manager.
- provide recommendations to the grower on a suggested course of action should pests be found during monitoring.

Training

Crop monitors must complete online training specific to the commodities they are monitoring each year prior to the accredited property submitting an application.

Crop monitoring

Crop monitors must conduct crop monitoring:

- during the entire growing season
- on every accredited block
- monthly, unless otherwise specified by the protocol or work plan.

Crop Monitors must maintain records of their crop monitoring including:

- date the monitoring was conducted
- block identifying name or numbers for those that were monitored.
- target pests
- results of the monitoring.

Note:

Crop monitoring may be required to start before property accreditation has been given.

Trapping

As required by the protocol, growers must demonstrate they have methods for monitoring pest freedom or low pest prevalence. The most effective method for monitoring fruit fly is trapping, so it is highly recommended that crop monitors install and maintain traps as evidence of compliance with this requirement.

The traps must:

- be deployed for the entire growing season unless otherwise specified by the importing country
- be placed in the blocks as outlined in the protocol
- be set at least one metre from the ground
- be checked and maintained fortnightly unless otherwise specified by the importing country or manufacturer's label
- contain the appropriate lure for the target pest and be changed in accordance with the importing country requirement or where the importing country doesn't specify, the manufacturer's label
- be replaced if they become damaged, ineffective or reach the suggested replacement period on the label.

Crop monitors must maintain a record of any trapping programs including:

- location of each trap, referencing the export accredited block number
- date deployed
- results of trap checks
- any required maintenance.

Performance Standards for Crop Monitors

The manager of the farm must ensure that the following performance standards are met, although if the crop monitoring is done by another individual (either within or outside the business) then this person may assist during the audit process. The performance standards are outlined in Reference: <https://www.awe.gov.au/sites/default/files/sitecollectiondocuments/biosecurity/export/plants-plant-products/plant-exports-manual/performance-crop-monitors.pdf>.

Further Assistance

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