

Australian Grain Industry – Code of Practice Technical Guideline Document

No. 6 GRAIN CERTIFICATION

Compiled on behalf of the Australian Grain Industry by: Grain Trade Australia

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Australian Grain Industry - Code of Practice

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Technical Guideline Document

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Version Control

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For more information contact Grain Trade Australia

www.graintrade.org.au Phone: 02 9235 2155 Email: admin@graintrade.org.au

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1. Application

Applies to the certification of any grain commodity.

2. Discussion on Certification

2.1 What is Certification

Certification is defined as provision of written evidence attesting to the nature of a parcel of grain.

2.2 Certification Types Required

Certification may be required for various reasons on any parcel of grain traded along the supply chain. The type of certification required will depend on a range of factors which may include:

- A simple statement such as the general description of the grain e.g. the commodity type and season produced.
- Inherent characteristic of the grain e.g. the grain is a particular variety.
- A statement advising of external influences on the grain e.g. specific details on chemical treatments applied to the grain.
- A detailed statement advising of the quality characteristics of the grain following on from a series of analytical tests e.g. the grain complies with a particular quality standard or contains particular chemical residues.

2.3 Sample Requirements

In many cases, certification will require that a representative sample of the grain is to be taken for laboratory assessment.

- Any such representative samples must be collected using appropriate methods, equipment and by suitably trained personnel and at regular intervals throughout the loading process or by taking a range of samples from a static bulk of grain.
- The sample for which the certification is provided must be representative of the entire grain parcel.
- National and international sampling guidelines, standards and methods must be used where required.
- Any sub-sampling of the representative samples must be done in a manner to ensure the subsequent sub-sample is representative of the original parcel of grain or grain sample.

2.4 Regulatory Controls

There are various controls on the provision of certification within the Australian grains industry.

2.4.1 Industry Control

There are generally two elements that apply, being:

- Recognised industry practices. For example, sampling guidelines as outlined in GTA Trading Standards for static sampling of truckloads of grain tendered for delivery, for subsequent grade classification.
- Industry bodies. For example, sampling and testing requirements for provision of certification where the
 certification provider is a member of a recognised industry body such as International Federation of
 Inspection Agencies (IFIA).

2.4.2 Government Control

This relates to regulations applying in a particular country that must be complied with when providing various forms of certification for grain exports. The government regulator may require various records to be kept as part of that regulatory process, in order for a certificate to be provided on that parcel of grain. Where required all relevant legislation and regulatory controls must be complied with, including all aspects of sampling and certification (e.g., sampling rate, sampling equipment to be used).

In Australia this includes regulatory bodies such as:

- The National Measurement Institute (NMI) which governs what type of equipment may be used for particular tests and commodities.
- The National Association of Testing Authorities (NATA) accredits organisations for technical competence in performing tests which an organisation may use as part of their subsequent certification of a product.
- The commonwealth Department of Agriculture and Water Resources (DAWR) which approves various certificates related to exported grain to certify compliance with importing country quarantine requirements. For example, a Phytosanitary certificate to certify that the Australian plants or plant products have been inspected according to appropriate procedures, and they are considered to be free from quarantine pests, practically free from other injurious pests, and conforms to the current phytosanitary regulations of the importing country for various pests and diseases, including weed seeds.
- State Departments of Agriculture are responsible for providing licenses or permits to individuals using various chemicals on grain. For example, an Agricultural Chemical User Permit or a Commercial Operator Licence.
- The Australian Pesticides and Veterinary Medicines Authority (APVMA) is a statutory authority which is responsible for the registration of all agricultural and veterinary chemical products into the Australian marketplace. For example, fumigation on-board a vessel may only be approved to be conducted by appropriately licensed fumigators.

2.5 Providers of Certification

There will be a range of providers of certification, this will include:

- Individual suppliers of the grain who are a party to the contract;
 - Third party commercial service providers such as:
 - o Independent Inspection Agencies; and
 - Analytical Testing Laboratories.

Where providers of certification belong to recognised national, international or industry certification bodies, or operate under regulatory controls, certificates must be provided according to those applicable requirements.

Where information is provided by other parties, the provider of the certification should ensure they are satisfied with the validity of that information. The source of the information may or may not need to be listed on the certification.

If the provider of the certification provides statements outside of their area of expertise, appropriate documentation must be available to confirm the statement made.

2.6 Format of Provision

Certificates may be provided in a range of formats but must always be written. The nature of the certification required will determine the content of the certificate

- For certification provided by individual suppliers of the grain:
 - o A simple format covering requirements may suffice e.g. wording to be used as listed in a commercial contract between the buyer and seller.
 - Using relevant documents such as listed in the contract or as commonly used by industry e.g., a GTA or Stockfeed commodity vendor declaration.
- For certification provided by commercial suppliers:
 - o The information required on the certification is generally determined by the supplier.
 - The format of information provided on each certificate will be as agreed. As applicable to the certificate type, it should contain relevant information such as:
 - Certification supplier contact details;
 - Certificate type e.g., Certificate of Chemical Residue Analysis;
 - Customer details;
 - Grain sample details e.g., sample obtained by certificate provider or results based on submitted sample;
 - Relevant dates e.g., sample receipt, analysis date;
 - Method of analysis; and
 - Relevant disclaimers, liability clauses etc.
- For certification provided/authorised by regulatory providers
 - o All certification must be in the format as stipulated by the regulator;
 - All supporting evidence accompanying the certificate must meet requirements of the regulator;
 and
 - All samples used for assessment for subsequent provision of results on the certificate must be taken according to agreed procedures and be representative of the grain parcel.

2.7 Supporting Material for Certification & Potential Wording

As outlined in the Code of Practice, certification is only to be provided where information contained in the certificate can be supported by records or other suitable means. This includes, but is not limited to:

- Records of sampling and testing of the grain;
- Historical information and records that is relevant to the grain in question;
- Information provided by other parties; and
- Using knowledge of relevant industry or Government experts.

The following section outlines relevant supporting material to be considered when supplying various types of certification. The list is not inclusive.

Certification Statement	Supporting Information		
Certification Statement	Considered Suitable	Not Considered Suitable	
Quality			
As per applicable grade e.g., GTA H2	Sample grain, conduct all tests as listed in grade standard e.g., H2.	Visual assessment of grain only.	
Minimum quality for specific parameter e.g., protein min. 12%	Sample grain, conduct analysis for all listed parameters e.g., protein analysis.	No sample of specific grain parcel taken or analysis conducted. Protein results of other sample used.	
Within the applicable grade, variety is declared e.g., Mace in H2	Sample grain, assessment for particular variety.	No varietal assessment conducted.	
Is of sound merchantable quality, suitable for milling	Sample grain, assess as per applicable grade/standard. Visual assessment of defects and contaminants. Odour and insect free.	No visual assessment conducted.	
Consignment free from soil, weed seeds and foreign material	Sample grain. Visual assessment as per standard and/or Export legislation limits and/or not found in the sample.	Reliance on DAWR inspection of grain at export.	
Product is malting grade barley	Sample grain. Assessment as per malting standards.	No sample taken or assessment against malting barley standards.	
Harmful seeds shall not exceed a specific limit	Sample grain. Assess as per applicable standard for weed seeds of concern.	No assessment conducted.	
Insect damage nil	Sample grain. Assess for insect damaged grain.	No assessment conducted and reliance on standards for that grade certified.	
Chemical Residue Stater	ment		
Grain conforms to national / international limits	Sample grain, assess for chemical residues e.g., all post-harvest treatments registered in Australia/importing country / Codex MRLs.	No analysis. Reliance on National Residue Survey testing results.	
Grain meets Codex limits	Sample grain, assess for chemical residues e.g., all post-harvest treatments with Codex MRLs	No analysis. Reliance on National Residue Survey testing results.	
Grain contains the following chemicals	Sample grain, analyse for all chemicals listed on certification.	No analysis.	
Fumigation Certificate stating what chemical grain was fumigated with	Provision of certificate by licensed fumigator who conducted fumigation, or from company that conducted the fumigation.	No certificate provided from licensed fumigator or company that conducted the fumigation.	

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Certification Statement	Considered Suitable	Not Considered Suitable
Fumigation Certificate stating "fumigated as per national/ international protocols"	Provision of certificate by licensed fumigator who conducted fumigation or from company who conducted the fumigation. Records show fumigation occurred pre-shipment within DAWR/industry acceptable timelines and acceptable low risk of infestation.	No certificate provided from licensed fumigator or company who conducted the fumigation). Fumigation conducted outside of acceptable timeline pre-shipment and movement through supply chain unknown or creates unacceptable infestation risk.
Pesticide Residue Free	Full treatment history reviewed and/or sample grain and analyse for all post-harvest grain treatments.	Treatment history unknown and no sampling and assessment for residues conducted.
Other		
Fit for human and/or animal consumption	Visual assessment of defects and contaminants. Chemical residue, mycotoxin tests as per membership organisation guidelines. *	No visual assessment conducted. No analysis as per membership organisation guidelines. *
Grain is "considered" insect free	Sample grain, visual assessment of representative sample, treatment history of grain reviewed and considered based on voyage time to market.	Reliance on DAWR inspection of grain at export. Reliance on visual inspection at grain receival. No consideration of grain treatment history.
Grain meets the quarantine requirements of the importing country	Review quarantine requirements listed in MICoR. Sample and assess for parameters to meet "fit for human consumption"	No endpoint inspection for objects of quarantine or for parameters to meet "fit for human consumption".
Grain is of the current season / latest crop	Production, receival and storage history of grain is known.	No review of or knowledge of grain history.
Grain complies with contract specifications	Sample grain. Assess as per all specifications listed in contract.	No sample obtained. Analysis not conducted for all specifications.
Grain meets specific mycotoxin and/or heavy metal limits	Sample grain. Assess as per listed mycotoxins and/or heavy metals.	No sample obtained. Analysis not conducted for all listed mycotoxins and/or heavy metals.
Grain meets international mycotoxin and/or heavy metal limits (i.e., these are not listed)	Sample grain. Assess for main mycotoxins and/or heavy metals prevalent in Australian grain or internationally under Codex for grain commodities.	No sample obtained. Analysis not conducted for all relevant mycotoxins and/or heavy metals.
Free from odour, retains natural smell	Sample grain. Visual and odour assessment.	No assessment undertaken.
Testing methodology as per GTA/FOSFA	Sample grain. Assess each specification as per listed method. If no listed method, as per industry accepted methods.	No assessment undertaken, or method used is not an accepted method by industry or internationally recognised.
Weight Certificate	Weigher and/or weighbridge calibration records held and available as required. Review records from loading.	No records reviewed.
Empty vessel/container Cleanliness Certificate	Vessel/container inspected by approved authority prior to loading.	No inspection occurred.

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Certification Statement	Supporting Information		
Certification Statement	Considered Suitable	Not Considered Suitable	
Microbiological limits within specific levels e.g., salmonella	Sample grain. Assess for specific parameter.	No assessment conducted.	
Nil for specific parameters e.g., dioxin, parasites, smut, rodent and excreta	Sample grain. Visual inspection for defects/contaminants and analysis for specific parameters not able to be visually determined e.g. dioxins	Appropriate analysis not conducted.	
Free from statements e.g., sprouted	Sample grain. Assess visually or analyse as appropriate.	Appropriate analysis not conducted. Analysis conducted, and parameter found at levels above permitted levels.	
GM Certificate e.g., grain has not been genetically modified	Grain storage history known and/or sample grain and assess.	Grain storage history not known, or assessment not undertaken.	

Note:

- * NATA, IFIA, GAFTA etc. For example, in reference to IFIA, testing required varies by commodity and nature of Certification description. For example, "fit for human consumption" statements for wheat require analysis of various pesticides, heavy metals, mycotoxins, poisonous seeds, ergot, odour, visual appearance and radioactivity (if grain is originating from certain origins).
- 1. The examples of certification wording above are a guide only. Industry should consider the commercial implications of providing the requested certification and the specific wording on that certification.
- 2. The supporting information listing is not exhaustive and additional analysis may be necessary. Individual contractual requirements and statutory regulations, provided they are made known, take precedence over the minimum analyses proposed in the table.