10 April 2006

Plant Exports Exports Group
Biosecurity New Zealand
Ministry of Agriculture and Forestry
PO Box 2526
Wellington

Attention: Technical Support Officer - Plants

**Biosecurity New Zealand Export Certification Standards**

**IVA Authorisations**

**Section 3.2**
The requirement for IVA staff when performing certification activities to wear photographic identification may be contrary to some health and safety programmes. It is suggested that they be required to carry the photographic identification.

**Section 3.7.1**
Under Systems and Surveillance audits there is a requirement to detail the Organisation and personnel identified within the organisation. The ability to provide personnel information is dependent on decision as to whether organisations have to supply their registers to the IVA and/or MAF. I would therefore seem that if this information is required that the IVA provides a copy of their operators register current at date of report.

There is no reporting requirement for Certificates that have been intercepted overseas.

The requirement for critical and other non-compliances is covered by the requirement 2.5 ii Completion of internal audit and report to Biosecurity NZ within 21 days. Suggest retain the critical as an event and remainder covered by audit report and corrective actions.

It is noted that there is no requirement to notify critical non-compliances identified outside of the audit.

Recommend that the IVA reporting requirements for Surveys be included. Can be dependent on that option being undertaken.

Also recommend that there be a statement relating to reports required by other MAF.
programmes.

This would mean that all IVA reporting requirements are in one place.

Section 3.7.2

The section on Quarterly and Annual reports does not specify form that these should take and it would appear that they could be repetitive or provide raw data

Organisation Requirements

It is noted that there is no reference to organisations that export product but contract other organisations to carry out inspection, Product Security and Certificate preparation and printing. In the past the organisations have requested accreditation to facilitate them obtaining Phytosanitary certificates. There is therefore no part of the organisations system where product can be confirmed as meeting requirements. This confirmation is carried out under their suppliers’ systems.

The new MAF Requirements unlike the old do not require the approved operators to maintain a register of non-accredited operators that they supply with product (PEO.OAR 4.2.1 ix)

Provided that the exporter can demonstrate to the Verification Officer that the product has been inspected and that the Post Inspection security has been maintained through an approved organisations system there seems no reason for them to be approved.

If it was felt that to facilitate trade there is a need for these exporters to have some form of acknowledgement then this might be handled through some form of registration with the IVAs

Should there be guidance to organisations dealing with changes of names or of ownership. Recently a number of companies have changed hands. In the past the requirement has been for an exchange of letters

Also guidance on how long can organisations maintain their accreditation when they are inactive. Presuming they continue to pay their fees

Section 4.3.1

Under xii approved procedures are required to be available to appropriate personnel but it does not seem to be a non-compliance not to follow them

Treatment Approval Programme

Section 6.4

The value of “n” for a new operator is hard to forecast. In other programmes where this formula is
applied it relates to a fixed site. Rather than forecasting I recommend that it would be best to take recent history say last month. Alternatively utilise the principle that has previously been applied in Plants that the person doing the treatment is considered to be a site. A Mobile operator with two personnel would start at 11 audits per person per year.

Regards

[Signature]

John Reeve
IVA National Manager