Good afternoon

Re: IVA consultation verse auditor

The intention of all operator systems is to meet the requirements of PEO.OAR, so that our export products can successfully arrive at customer destinations globally, with correct documentation(s). In developing and maintaining T&G and other operations operator systems I have seen a diverse range of

1. Methods (wording) to achieve accreditation
2. Excessive methodology to achieve an individuals interpretation of the standard
3. Requirement for additional procedures to meet the standard
4. Requirement for protocols / accreditations where none is required

all off which take the focus away from the potential "risk" i.e. the product to a paper war, where non compliances are received for activities that have nothing to do with the product, and have forced organisations into focusing on excessive procedures than the product. While NZ has a limited resource of expertise in the horticultural / agricultural arena, those people we do have are highly skilled and normally cross a number of technical fields within the one roll.

With everyone now having to re write operator systems and have them accredited by the 1st September 2007, I propose that ....... the IVA can act as a consultant for an operator system they audit so that we can achieve the goal of correctly accredited product being exported to international markets........ to do this I would agree that

1. the IVA has different people responsible for the consultancy and the audit of the system
2. the IVA does not write the operators system

Previously where I have brought in another IVA to look at simplifying the system, I spent all my time training the person in our IT and system, where as our appointed IVA have been trained in the entire system.

This would clearly also apply to training, where some expertise is held by IVA's and they could be an excellent source of knowledge for upskilling a seasonal workforce.

Re: Drop dead date of 1st September 2007

I recognise that a stick in the sand has to be made. I would like to propose that where organisations have expansive systems covering multiple crops with different export seasons, or where the main export season finishes within close proximity to this date and doesn't start for a further 5 months: - that the organisation can submit a timeframe for re writing systems and achieving accreditation prior to the export season. This would be no different from an organisation submitting a completely new system just prior to export season commencing.

Re: Submission of re writes

Given that BNZ have implement this initiative, I assume existing systems that are on low audit frequency will maintain that status on the new system.
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Thanks
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