17 April 2006

Dear Plants Exports Team

Thank you for the opportunity to comment on the proposed phytosanitary export standards.

The following are the comments and suggestions from Independent Verification Services Limited.

**General comments**

Does BNZ mean to use the term ‘Plant Product’. Should it mean ‘Export Products’? This covers Forestry.

Could the IVAs be given access to administer PROASS. This way, it could be kept up to date immediately. It also reduces the administration costs.

**Standard – System Overview and Requirements**

1.1 – Give the link on the last paragraph for export certification standards.

4.3.2 – ADs requiring information on area pest freedom will need to have IVAs sharing that information immediately. This will allow ADs to be completed accurately.

4.5 – The link to the schedule of standard cost is not available

**Standard – IVA Requirements**

2.3 Table 1, Step 1 – Can IVAs have access to MOUs between accreditation body and BNZ. IVAs need to be aware of what the requirements of BNZ is of the accreditation bodies.

2.3 Table 1, Step 3 – Only one of the organizations should assess the application. As it reads both BNZ and accreditation body assess the application. This could cause delays. The accreditation body should be the leading agency.
2.3 Table 1, Step 5 – The IVA should only submit the procedures to the accreditation body. Not both BNZ and the accreditation. It is duplications.

2.6 (i) – This reads that any non compliance would warrant BNZ suspension. Some non compliance will be minor. It should be changed. It also reads that there is not leeway to allow an IVA to demonstrate address of a critical non conformance. If critical non conformance are raised, IVAs should be allowed to demonstrate address rather than automatic suspension.

2.10 The new IVA after transfer should be allowed to take over any outstanding non conformances (see point ii). Requiring the former IVA to manage close out CARs may not be viable as it could be a loss making exercise. The organisation may be moving because they are not paying accounts.

The third paragraph conflicts with 2.11. The former IVA may make a decision to withdraw services (for valid reasons) and this paragraph requires them to continue with services until the new IVA provides formal acceptance.

The former IVA needs to provide the new IVA a summary of history and any outstanding issues within 48 hours of transfer.

3.2 (iii) (c) – Specifying a lead auditors course and a brand (SG3). This should be changed to be more generic such as ‘audit training that is recognized for international auditor registration.

3.7.1, Table 4 – third row. Why not say all non conformances?

3.7.2 (iii) – Also include actions taken by the organisation.

3.7.4 – Reports could contain import information e.g. treatment suppliers performing import treatments (also). Is the Technical Support Officer Exports (Plants) the correct person to send reports. The import side should be covered here as well.

4.4 – Organisation requirements – (ii) (b) and (v) are the same.

4.4 – Certificate verification (iii) – communication pest surveys to other IVAs is a must. Due to the competitive environment, sharing of this information may be compromised by unnecessary delays. Pest survey results should be made available on the IVA www so that it is accessed by other IVAs. The onus is on the pest surveying IVA to make this information available immediately (by the close of business each day).

General Questions

Can an IVA provide verification overseas (if urgently requested by the organisation)

**Standard – Organization Requirements**
Table 1, Step 2 – should have a limit how long is acceptable for evaluation for a new organisation. It can drag on. Suggest 3 months.

Table 1, Step 9 – May advance to Step 12 if not corrective action required! There is a presumption here that there will be corrective actions.

Table 2, Step 2 – give a timeline, e.g. 1 month to conduct the assessment.

2.4 Suspension could also result if the organisation does not have an IVA.

2.5 MAF BNZ terminates an organisation. Formal advise of termination should be by MAF BNZ, not the IVA. BNZ advises when approved, therefore should advise when terminates.

2.6 MAF BNZ reinstates an organisation. Formal advise of reinstatement should be by MAF BNZ, not the IVA. BNZ advises when approved, therefore should advise when reinstates

2.7 (v) – Should state the contract of approval is pending, thus Clause 11 is pending

2.8.1 – This is unfair to the existing IVA if issue is a matter of payment of accounts. The onus should be on the new IVA to close out non compliance when notified of these by the existing IVA.

3.1 (iii) Remove ‘persons’ and replace with ‘positions’. That way the procedure is not out of date when somebody resigns.

3.5 – Should not the organisation identify the key competencies of each staff involved in critical steps for phytosanitary activity.

3.6.3 – Does this mean an internal audit as well as supplier audits are conducted three yearly. This should really only be annually?

3.8.3.2 - Refer to comments on plant products at the beginning of this correspondence.
Standard – Technical Requirements: Pest Surveys

Nil comments.

Can an Exporter Organisation conduct this process?

Standard – Technical Requirements: Phytosanitary Documentation (Phyto Ecert)

2.1(b) – What Registration Form. Where is it?

2.2 (i) – give the www link

3.2 (Note) – give the www link

Standard – Technical Requirements: Registered Certification Mark (ISPM 15)

Table 1, #4 – Where is the Contract of Approval?

Table 1, #9 – Allow for if nil non compliances to move to Step 12.

2.3 – How much is the fee?

2.4 (ii) – An IVA cannot suspend, only BNZ can.

3.1 – Allow for stamping pre-pretreatment. Organisations may have the following set up:

- segregated product that will be treated, thus to expedite the process, if control is in place, product could be stamped before treatment
- for health and safety, mobile fumigators should be allowed to stamp timber before fumigating.

7.2 – Timber may be treated on site by a mobile Treatment Supplier (e.g. Methyl Bromide). If the requirement of 7.1 are met, then this should be accommodated. This could cover the cases for break bulk at freight forwarders.

Appendix 1 – Name of Auditor, Signature of Auditor should be replaced with ‘Name of IVA’ and ‘Contact IVA Person’. Auditors can change.

Standard – Technical Inspection: Phytosanitary Inspection

Does BNZ mean to use the term ‘Plant Product’. Should it mean ‘Export Products’. This covers Forestry.

2.4 (ii) Should this read <5.0% and <25g respectively?

Provide the www.
2.7 – Expand this section to include the scope of the ‘end of the pathway’ rather than the ‘point of export’.

**Standard – Requirements for the Supplier of Official Treatments**

Page 4, third paragraph – this should read ‘based upon the principles of ISO 9000’

Page 4, last paragraph – this should read ‘for any hazardous substance being used and follow recognized Health and Safety’.

4.1.4 – the standard should allow the IVA to act as the internal auditor. For treatment suppliers in one location, the need for internal audits would be redundant if IVAs are conducting regular verification audits.

4.1.5 – Define ‘regular’ internal audit. Suggest at least annual.

The requirements for internal audits should only be for suppliers with multiple offices.

4.1.6 – Management reviews should be removed. This is overkill on the quality management system. It may not be done properly. IVAs conducting regular verification could replace this requirement.

4.2.1 (a), fourth bullet point – ‘records management’, what does this mean.

Include Corrective Action Requests in this list.

ISPM 15 bullet points – the tracking requirement for treated timber including sales, transfers etc, cannot be conducted by mobile fumigators. The onus is on the exporter (or freight handler). Fumigators could mark the timber with the cert stamp and that is all.

4.2.1 (c), second paragraph – replace ‘your’ with ‘the’.

4.4, Contract Review – this may be part of normal processes in booking a job. The standard makes it sound very formal and add significant time to each fumigation.

4.5 (e) (ii) – This should read Open Polytechnic of NZ Unit Standards

4.5 (e) (iii) – This should read ERMA approved handler course.

4.7 (a) – This statement should specify that gas sight glass dispensers are included.

5.3, Second paragraph – This statement should state that the requirement for approved transitional facility is only applicable for import related treatments.

5.6 (b) Not allowing treatment suppliers to use max/min thermometers is a big call. These are simple devices, cost effective and consumable. The minimum temperature is the important monitoring. Treatment suppliers will not be happy to use data loggers as they are expensive and can be eroded by Methyl Bromide (with time). Secondly,
mobile Treatment Suppliers may not be comfortable leaving an expensive data logger during a treatment.

5.10 – Treatment Suppliers should be allowed to use the word MAF. It is understood and makes claims less wordy. Not the logo, only the word MAF.

5.10.2 – Suggest the standard specifically indicates here that 2 different types of certs are needed. One for official treatments, one for client requests.

Appendix II, 1.0 (x) – Replace ‘a full approved handler’ with ‘an approved handler’.
Replace ‘true certifier’ with ‘test certifier’.

Standard – Treatment Supplier, Overview and General Requirements

Page 7 – Statement about MAF Quarantine Service. It was indicated that MAF QS will no longer function as an IVA. If it is an IVA, it should be approved to the IVA requirements and gain ISO 17020 accreditation for this function. This will ensure consistency in verification approach.

Ditto comments for 4.1.2.

4.1.2 (c) – Recommendations for suspension are also relevant?

4.1.3 (b) – An allowance should be made for a ‘rationalised supervision’ during the evaluation process. Also after an IVA makes a recommendation for approval. This is implied under 6.2. This should recognises the effort being made. There should be time limit for ‘the evaluation’ e.g. 3 months.

6.1 (c) – This should state that three consecutive compliant on-site audits are required. Does it have to be for each location e.g. a treatment supplier may have offices nationally?

6.2 – Typo, replace ‘they’ with ‘the’.

6.4 (b)(ii) – this frequency is too high for mobile treatment suppliers. It will add to compliance costs and may hinder the industry. Options for schedules for mobile treatment suppliers are offered in Attachment 1.

6.4 (b)(iii) – Should this read ‘a further five full’ and not ‘a further four full’.

8.0 to 8.6 – Non conformances grades should be with the new suite of standards i.e. critical or other. Having three grades may confuse. Having only two grades will enhance the process focus on outcomes/CCPs.

8.1 (viii) – The requirement for segregation for mobile fumigators only applies when the product is being fumigated. Other than that the onus should be on the exporter or freight handler.

8.1 (x) – Should allow for supervision by an approved treatment technician.
8.2 (i) – Unfair to issue a major non conformance if there is a point of difference between the IVA and the treatment supplier. The Treatment Supplier may be correct! Should remove this clause as BNZ will be the referee in most cases if it is not resolved.

10.1 If a TS leaves transfers to another IVA, the former IVA is not a baby sitter for one month. The new IVA should take full responsibility. Transfer may be because former IVA will not provide services due to lack of payment for services. The former IVA would be forced to continue a loss making service for one month. Compliance to this requirement be a loss making exercise to the former IVA. Secondly the former IVA should not be responsible for continued non compliance after transfer.

I trust the above comments assist BNZ in the consultative round. Thank you for the opportunity.

Regards

Stephen Mansfield
General Manager IVS
Attachment 1

Proposed audit schedule for verification audits under new Treatment Supplier, Overview and General Requirements.

2 options to consider – time bound or frequency bound.

Option A – Time bound

<table>
<thead>
<tr>
<th>Frequency Level (All Treatment Types)</th>
<th>High</th>
<th>Medium</th>
<th>Low</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verification Audits</td>
<td>2/fortnight</td>
<td>1/fortnight</td>
<td>1/month</td>
</tr>
<tr>
<td>Type of Audit</td>
<td>Partial or whole</td>
<td>Partial or whole</td>
<td>Partial or whole</td>
</tr>
<tr>
<td>Time scale</td>
<td>4 months</td>
<td>4 months</td>
<td>Ongoing</td>
</tr>
</tbody>
</table>

Option B – frequency bound

<table>
<thead>
<tr>
<th>Frequency Level (All Treatment Types)</th>
<th>High</th>
<th>Medium</th>
<th>Low</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verification Audits</td>
<td>1(n) per fortnight</td>
<td>0.5(n) per fortnight</td>
<td>0.25(n) per fortnight</td>
</tr>
<tr>
<td>Type of Audit</td>
<td>Partial or whole</td>
<td>Partial or whole</td>
<td>Partial or whole</td>
</tr>
<tr>
<td>Time scale</td>
<td>4 months</td>
<td>4 months</td>
<td>Ongoing</td>
</tr>
</tbody>
</table>

Where \(n\) = number of treatments forecast per week.

Criteria for both options
- Fixed or mobile operators
- Mix of each region
- All regions must be audited at least 4 times per year
- IVA decides partial or whole audit will be conducted depending on performance or risk areas. E.g. if visiting Invercargill, it could be audited fully 4 times per year.
- Current promotion or demotion specs i.e. move back if non resolved major in 48 hrs, immediate demotion or suspension if critical issues raised etc.

A whole audit means the entire treatment is audited as well as records and certifications
A partial audit means any part of the process can be audited, commencement, completion, records, surveillance check on the consignment post treatment, security checks, register of treatment etc.