## SUBMISSION FROM SGS NEW ZEALAND LTD

Comments related to Draft Biosecurity New Zealand Export Certification Standards.

### BNZ STANDARD: IVA REQUIREMENTS

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| Page 5, 2.2 Certification Options | A number of activities currently performed by IVAs on MAF’s behalf are not covered by the documented Certification service options (also not covered in existing Standards). These include IVA functions under Export Compliance Programmes (e.g. monitoring various activities performed by non-approved industry parties / registration processes of industry parties / administrative and reporting functions) and Product Pre-clearance Programmes (e.g. IVA technically performing USDA inspections).

We believe these IVA functions need to be satisfactorily accounted for in the IVA Requirements Standard. |
| Page 10, 3.2, iii c) Competency of IVA personnel | What is SG3 competence, specifically?

We have been unable to locate a specific set of criteria or skill requirements matching this indicator of competence. |
| Whole Standard, General | This Standard contains a significant number of references to the term “audit” and audit functions.

Given the absence of any audit function referenced in ISO 17020 (which contains the terms “inspection” and “examination”) is the IVA performing audits in its contracted role to MAF? |