

DRAFT August 2009

The United States Department of Agriculture

And the

New Zealand Ministry of Agriculture and Forestry

**TECHNICAL WORK PLAN FOR THE USDA
PRE-EXPORT INSPECTION
OF NEW ZEALAND**

PIPFruit

(Apples, European Pears & Nashi)

**EXPORTED TO THE
UNITED STATES OF AMERICA**

AMENDMENT RECORD

Amendments to this work plan will be given a consecutive number and will be dated.

Please ensure that all amendments are inserted, obsolete pages removed, and the record below is completed.

Amendment No:	Entered By:	Date:
1. Contents updated	RG	15/2/07
2 Section 2.2.4	RG	15/2/07
3 Section 2.2.5	RG/PJ	15/2/07
4 Section 2.4	RG/PJ	15/2/07
5. Section 5.3.2	PJ/RG	23/2/07
6 Section 5.3.4	PJ/RG	23/2/07
7. Section 9.3	RG	7/2/07
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Appendix 2: Timetable

Appendix 3: Example PPQ 203 form

REFERENCES

MAF Biosecurity New Zealand Standard System Overview and Requirements

MAF Biosecurity New Zealand Standard "Independent Verification Requirements": (BNZ.IVR)

Requirements for the authorisation of Independent Verification Agencies providing phytosanitary services for the delivery of Ministry of Agriculture and Forestry Phytosanitary Certification.

MAF Biosecurity New Zealand Standard "Organisation Requirements": (BNZ.OR)

Requirements for the approval of organisations providing phytosanitary inspection and/or export documentation activities within the Ministry of Agriculture and Forestry Phytosanitary Certification System.

Biosecurity New Zealand Export Certification Standard Technical Requirements: Phytosanitary Inspection (BNZ.TRPI)

Biosecurity New Zealand Export Certification Standard Technical Requirements: Phytosanitary Documentation (Ecert) (BNZ.TRPD)

MAF Biosecurity New Zealand Standard PEO.PPR:

Requirements for Pre-Export Inspection (pre-clearance) programmes.

The New Zealand List of Pipfruit Pest

An up to date list of pests pipfruit is host to in NZ with the pests quarantine status categorised by USDA.

USDA Technical Package

USDA Pre-clearance Programmes Administrative Manual

1.0 PURPOSE

The purpose of this Work Plan is to specify the generic requirements and working procedures to be met by the parties (i.e. the United States Department of Agriculture (USDA), New Zealand Ministry of Agriculture and Forestry, Biosecurity New Zealand - Exports (MAF-BNZ), the NZ Independent Verification Agency's (IVA's), packers, registered coolstores and exporters) participating in the New Zealand pipfruit pre-clearance programme.

When the requirements of this Work Plan are met, USDA inspected, passed and clearly identified pipfruit will receive early release on arrival in the United States of America.

2.0 SCOPE

This Work Plan covers the requirements for the USDA pre-export inspection of pipfruit (apples, pears and nashi) exported from New Zealand to the USA.

2.1 Technical Workplan Agreement

- i) This Technical Work Plan is the pre-export inspection agreement between the USDA and MAF-BNZ (on behalf of NZ Exporters) for the pre-clearance inspection of pipfruit from New Zealand by USDA.
- ii) Any deviations (e.g. trials) from this work plan may be considered, subject to the proposals being forwarded to MAF-BNZ during the year preceding the proposed implementation. All proposals will be reviewed by MAF-BNZ in the first instance and then discussed with USDA for their agreement prior to any trials being implemented.
- iii) The Co-operator Agreement and Financial Workplan are the responsibility of Pipfruit New Zealand (PNZ).

2.2 Participating Organisations

2.2.1 USDA-APHIS: United States Department of Agriculture - Animal and Plant Health Inspection Service (referred to hereafter as "USDA")

Contact: **Paul McGowan Director Pre-clearance Programmes**

USDA Animal Plant Health Inspection Service

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**2.2.2. New Zealand Ministry of Agriculture and Forestry,
Biosecurity New Zealand, Pre-Clearance**

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2.2.3 Independent Verification Agencies

AsureQuality New Zealand

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2.2.4. Pipfruit New Zealand (Fund Manager & Statistical Information Co-ordinator)

Contact: **Sonja Reid or Sylvie Sicard**
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Phone: 06 873 7080
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Sylvie.sicard@pipfruitnz.co.nz

2.2.5 MAF Web Site Information

<http://www.biosecurity.govt.nz/regs/exports/plants/pre-clearance>

- i) Register of approved exporters
- ii) Register of approved inspection facilities
- iii) Register of approved storage facilities.
- iv) The Pipfruit Pest list (An up to date list of pests pipfruit is host to in NZ with the

pests quarantine status categorised by USDA).

2.3 DEFINITION OF TERMS

Audit: Systematic examination to determine whether the specifications of the work plan, USDA and MAF are being complied with. Audit frequency, unless otherwise specified by USDA, shall be that determined by MAF in BNZ.IVR.

Exporter: A commercial organisation involved in the export of pipfruit.

Failed: Inspected by USDA (MAF/IVA) and rejected for export to the USA

ICS Abbreviation for in-line carton sampling

IQP Abbreviation for integrated quality programme

IVA: Independent verification agency, a third party service provider. Authorised in accordance with requirements specified in MAF Biosecurity Standard BNZ.IVR to carry out export Certification activities for plants or plant products on behalf of the MAF Biosecurity Director, Pre-Clearance.

USDA Lot number: A unique USDA lot identification code.

Monitor: Spot checks (frequency determined by USDA).

On-hold: Pending determination of pest identification.

Orchard-Block: A pre-defined area of land within an orchard from where the pipfruit was harvested.

Passed: Inspected by USDA (MAF authorised IVA) and pre-cleared for export to the USA.

Pipfruit: Refers to apples, pears and nashi. (*Malus domestica*, *Pyrus communis* and *Pyrus pyranica*).

PPQ-203: A USDA certificate that certifies a consignment of pipfruit has been USDA inspected and passed (i.e. is pre-cleared).

PNZ: Pipfruit New Zealand.Incorporated.

Supervise: Continuous visual overview of an activity

TCE: An abbreviation for the standard pipfruit industry 18 Kg pack weight “tray carton equivalent”.

USDA: United States of America Department of Agriculture

USDA-Lot: A definite quantity (i.e. number of export packages) of pipfruit (apples and/or pears and/or nashi identified by one unique “Lot” number.

2.4 Pests and Organisms of Concern

- i) The primary pests of concern as identified by USDA are “Lightbrown apple moth” (*Epiphyas postvittana*) and “Wheat bug” (*Nysius huttoni*).
- ii) All pests that pipfruit in New Zealand are **associated with** have been categorised as 'Actionable' (i.e. quarantine) and 'Non-actionable' (i.e. non-quarantine) by USDA. Refer MAF BNZ Website for USA Importing Country Phytosanitary requirements (ICPR) for an updated pipfruit quarantine pest list.

2.4.1 Mealybugs

Quarantine actions are not to be taken on any life stages of mealybug intercepted. Where adult mealy bugs are found during preclearance inspection one adult female per week per district (Hastings/Nelson) is to be identified by a MAF accredited plant pest identification facility.

2.4.2 Apple leaf curling midge (ALCM) - *Dasyneura mali*

- i) ALCM is considered an actionable pest in California.
- ii) For lots found with ALCM during the USDA pre-clearance inspections, the sighting of ALCM is to be indicated on the PPQ 203 form.

The wording on the PPQ 203 form is to read:

“ALCM, *Dasyneura mali* present. Not suitable for California”

- iii) This will facilitate the un-impeded entry for marketing the fruit in all States except California. These lots may transit California to other US States providing the consignment leaves the port of arrival in California within (3) days of having gained USDA documentation clearance.
- iv) Lots inspected and found free of ALCM during USDA pre-clearance inspections may enter all US States including California subject to this “ALCM free” status being indicated on the PPQ 203 form with the following wording:

“Shipment inspected and no ALCM, *Dasyneura mali* found”

2.4.3 Pear leaf curling midge (PLCM) - *Dasyneura pyri*

- i) The conditions out lined above for ALCM also apply for PLCM.
- ii) For lots of pears or Nashi found with PLCM the wording to read:

“PLCM, *Dasyneura pyri* present. Not suitable for California”

- iii) The wording on the PPQ 203 form to read for lots of pears and Nashi inspected and found free of PLCM to read:

“Shipment inspected and no PLCM, *Dasyneura pyri* found”

3.0 USDA CONDITIONS GOVERNING THE ENTRY OF PIPFRUIT FROM NEW ZEALAND

3.1 US Code of Federal Regulation

- i) This regulation requires that a biometrically designed statistical sample will be taken by a USDA/APHIS inspector, for inspection for freedom from actionable quarantine pests, from each shipment. Should actionable quarantine pests be detected within the shipment, USDA will require the shipment to be subjected to “*approved fumigation*” with methyl bromide, or re-shipped or destroyed.
- ii) A shipment is defined as all of a type (genus) of fruit from the same country of origin offered at a U.S. port and from a single carrier, regardless of marks and numbers, grower’s lots, Customs entries, or numbers of importers involved.
- iii) Unless pipfruit is inspected and passed by an agreed USDA/APHIS pre-clearance programme, all product will be subject to inspection on arrival in the United States as described above.

3.2 Conditions for the Pre-clearance Programme

3.2.1 This pre-clearance inspection programme is designed to meet USDA/APHIS entry requirements into USA commerce. USDA reserves the right, to monitor pre-cleared shipments upon arrival to ensure compliance.

3.2.2 The normal daily work schedule for USDA inspectors in New Zealand will be 0800 - 1700, Monday through Friday. Hours outside of this will be reimbursed at rates specified by USDA regulations.

3.2.3 Officers may commence two hours prior to 0800 and finish two hours later than 1700 if previously arranged and considered by the officer to be necessary. Twelve hours maximum per day and/or no more than 60 hours per week is allowed.

3.2.4 Fruit shipped in a consignment from a PASSED USDA Lot will be only permitted entry when accompanied by a USDA PPQ-203 certificate. Copies of these may be obtained from the NZ IVAs.

Note: A New Zealand MAF Phytosanitary Certificate may be applied for to facilitate interstate travel within the USA.

3.2.5 Pipfruit transiting the USA for Canada are permitted into USA under special conditions, (refer section 11.6 for full details).

3.2.6 No more than 2 USDA inspection sites may operate concurrently in each of the primary pre-clearance inspection districts of Hastings and Nelson.

3.2.7 When scheduling USDA inspections at approved inspection facilities within a district the IVA’s are to ensure the USDA inspector has the opportunity to participate in some part of each lot being inspected. Refer to section 3.2.8 for when the USDA inspector is working outside the districts of Hawkes Bay and/or Nelson.

3.2.8 On an ad hoc basis the USDA inspector may travel to another region (outside of Hawkes Bay

and/or Nelson) to inspect pipfruit. In circumstances where inspections are required in another region, the appropriate IVA Programme Co-ordinator must ensure there are at least 3 IVA inspectors available to assist the USDA inspector in the “other region”.

Note:

1. This process will minimise the time the USDA inspector will have to spend outside of Hawkes Bay and/or Nelson.
2. IVA inspections may continue in Hawkes Bay and/or Nelson in the USDA inspector’s absence.

4.0 RESPONSIBILITIES

4.1 United States Department of Agriculture

4.1.1 USDA Classification of Pests

MAF is to provide USDA with an up to date list of pests associated with pipfruit in New Zealand. USDA is to categorise this list into actionable or non-actionable pests (refer MAF BNZ website for USA Importing country phytosanitary requirement).

4.1.2 USDA Plant Quarantine Officers Responsibilities/Activities:

- i) USDA will monitor and/or conduct (in conjunction with the IVA inspectors) the following:
 - Inspections of pipfruit samples.
 - Check USDA lots in registered coolstorage for:
 - identification (includes marking of pallets),
 - separation, and
 - removal of failed lots.
 - Verifying the quantities of USDA inspected and passed lots remaining in storage prior to the USDA inspectors departing New Zealand.
 - Supervise the loading of pallets of USDA pre-cleared pipfruit into sea containers and apply the appropriate seals, monitor the loading of trucks and vessels carrying pre-cleared fruit being exported to the USA.
- ii) On receipt of a pest diagnostic reply, enter the information on the lot status form and sign it off as “passed” or “failed”.
- iii) Validate the accuracy of the exporter information entered onto the PPQ 203 and sign the form as appropriate.
- iv) Upon completion of the pre-clearance programme for the year, the final USDA inspector is to issue a "Master PPQ-203" separately for each exporter and region. There may be more than one "Master PPQ 203" because of USDA-Lots "on-hold" pending pest determination. Multiple "Master PPQ-203" forms may be tallied on the Final Balances Form.

4.2 MAF BIOSECURITY NEW ZEALAND - EXPORTS

4.2.1 General Responsibility

MAF-BNZ is responsible for converting government policy, international standards and bilateral agreements into service and certification standards and work-plans to be met by all New Zealand organisations participating in this program.

To facilitate this pipfruit pre-clearance programme MAF-BNZ, in consultation with PNZ, as a means of ensuring a workplan and programme is in place and managed as requested, undertakes the following specific activities:

- i) Determines the USDA requirements and, through consultation with PNZ, question and clarify the requirements where necessary.
- ii) Authorises IVAs for the delivery of services pertaining to the USDA pre-clearance work plan and participate in agreed strategies for the implementation of corrective actions when required.
- iii) Updates the annual work plan in consultation with IVAs and PNZ, submit any updates/modifications for USDA approval, make available to registered exporters (via the MAF-BNZ web site) the finalised technical work plan for the current season.
- iv) Provides the MAF-BNZ accredited pest identifier (via the MAF-BNZ web site) the current pipfruit pest list for the USDA Programme.
- v) Maintains on the MAF-BNZ Web site the registers associated with the programme as listed within section 2.2.5.
- vi) Formally advises the USDA that a pre-clearance programme is required and request notification that the USDA is willing to participate in such a programme.
- vii) Undertakes a formal evaluation of the Work Plan in accordance with MAF Standard PEO.PPR to determine whether the requirements are met.
- viii) Forwards the evaluated and MAF-BNZ approved Work Plan to the USDA.
- ix) Communicates the USDA results to the IVAs and PNZ.
- x) On request, provides USDA the current information regarding the scope and status (including trapping records if requested) of MAF-BNZ's fruit fly surveillance programme.
- xi) Facilitates the categorisation of new pest finds findings with USDA in Washington D.C.
- xii) Recovers the costs of these activities from PNZ.
- xiii) Co-ordinates the provision of the programmes statistical information on:
 - Pest interceptions.
 - USA lot status regards acceptance/rejection.
 - Quantities of passed volumes in storage and it's location.
 - Weekly summary reports on USDA lot pass/fail events,
 - The end of season report to USDA (Canberra) on pest interception data and other programme information.
 - Other programme statistics as requested.

4.3 PNZ

Within this pre-clearance programme PNZ is responsible for:

- i) Arranging an annual contract (by 30 November in any year) with the USDA for the provision of a pre-clearance programme.
- ii) Make appropriate arrangements for the collection, management and payment of funds to meet the USDA (includes MAF) costs.
- iii) Establish the requirements for exporters to become participants in the programme.
- iv) In consultation with MAF-BNZ, IVAs and operators, participate in the annual review process for updating the work plan.
- v) Submit any new proposals for modification of the programme to MAF-BNZ for their consideration and presentation to USDA for approval.
- vi) Notify MAF-BNZ of the following:
 - By 30 October in any year if a USDA pre-export inspection programme is required for the following harvest/export season.
 - Confirm funding arrangements for MAF-BNZ activities.
 - Dates of when USDA inspectors will be required.
 - Exporters eligible to participate in the programme.
 - Any exporter who ceases to be eligible to participate in the programme.

4.4 INDEPENDENT VERIFICATION AGENCIES

Assist the USDA with or undertake on their request:

- Sampling & inspection.

- Monitor or audit of any aspect of this Work Plan as determined in consultation with the USDA Inspector.

Note: Accredited operators participating in IQP and/or ICS are to be audited as per their MAF accreditation audit risk status.

- Evaluate the suitability of inspection facilities for approval for use to undertake USDA pre-clearance inspections.

- Forward any pests requiring identification (as determined by the USDA Inspector) to a MAF-BNZ accredited pest identifier.

- Obtain a copy of technical reference sheet for any new pest found during USDA pre-clearance inspection from the accredited laboratory and give this to the USDA inspector for forwarding to USA to assist in the determination of the new pest's quarantine status.

- Monitoring the post USDA inspection safeguarding security measures of precleared pipfruit stored in NZ and the verification of USDA certification of this pipfruit when exported after the final USDA Inspector has left NZ for the season.
- Complete quarantine pest interception investigation(s) and provide a report on each as per section 9.3 within four (4) working days of being notified of the confirmed interception.

4.5 EXPORTERS

Exporters intending to participate in the USDA pipfruit pre-clearance programme must register their intent with PNZ by the 1st December each year.

To facilitate this pipfruit pre-clearance work plan, each participating exporter must provide their contracted IVA by 20th January each year, the name, contact and location details of the coolstorage facilities they will be using for storing USDA lots,.

5.0 SAMPLING

5.1 Approval of Sampling Operations

The operator and the operators staff competency procedures are to be MAF-BNZ approved and audited by an IVA.

The standard carton and bin sampling operations listed in section 5.3 must be undertaken within a pest free environment.

The audit frequency applied will depend on the confidence MAF-BNZ, through the IVA; have in that operators (e.g. packhouses) ability to operate their accredited sampling system effectively.

5.2 Samples From Remote Production Areas (other than H. Bay & Nelson)

The USDA inspection Sample may be forwarded to an approved inspection facility providing the appropriate arrangements have been confirmed with the IVA and the security requirements as per section 5.4 have been complied with.

5.3 Sample Options

There are a range of sample sizes depending on the size and sampling option available for the lot

Lot Sampling Options	Lot Size	Minimum sample size
Standard package sampling	≤ 1176 packages	183 packages
	> 1177 packages	200 packages
Standard bin sampling	60 bins	12 bins

IQP sampling	≤ 20 000 TCEs	3000 fruit
In-line carton sampling (ICS)	Any	200 packages

TCE = Tray Carton Equivalent @ 100 fruit per carton

5.3.1 Standard Package Sampling

In this option, sample fruit are manually sampled by MAF-BNZ recognised USDA samplers.

The minimum sample sizes (183 or 200 packages) must be manually selected evenly across all pallets within the lot, the sample packages may come from the top layer(s) of the pallet.

Note:

- i) If the lot is 200 or less pallets sample packages must be selected from each pallet.
- ii) If the lot contains more than 200 pallets, 200 pallets within the lot must be sampled.
- iii) If the lot is less than 183 packages, sample 100% of the packages.

5.3.2 Standard Bin Sampling

A bin must only contain one grower.

The Lot must not contain fruit from more than three growers.

The packhouse manager must provide the IVA with a full list of pallet cards and grower numbers associated with the Lot.

The IVA / USDA will then randomly choose 12 bins to form the Lots USDA inspection sample bins ensuring a minimum of 1 bin from each grower is selected.

5.3.3 Integrated Quality Programme (IQP)

In this option, fruit from low risk production sites are processed through MAFBNZ approved packhouses operating high volume water washers and

sampled using computer controlled random auto drop equipment.

The operator must document in their MAF-BNZ approved system their method of:

- i) Selecting low risk registered production sites for inclusion in the IQP lot.
- ii) Operating a high volume washing system.
- iii) Sampling a minimum 3000 fruit per lot using a computer controlled random auto drop.

Where the MAFBNZ approved operator elects to select the USDA sample from one size count (i.e. To use the modified IQP sampling regime), in addition to the above requirements the operator must:

- a) Place the IQP sampling station in a location that avoids/minimises chance of confusion with ‘normal’ packing stations.
- b) The complete IQP sample packing station must be sectioned off from other carton filling stations with barriers such as "rope, posts, signage & hazard tape" that is sufficiently high enough to prevent fruit being removed or added from outside the USDA sample area:
 - between sample packing station and other packing stations
 - between sample packing station and sizer lanes
 - between sample packing station and reject/return lanes
- c) Designated staff¹ only are to work within the enclosed IQP sample area to:
 - correct placement of fruit in fibre tray cups if automatic tray filler results in multiple layers of fruit
 - place filled trays in cartons designated for USDA inspection samples
 - label sample cartons with correct carton end label
 - Identify sample carton as a USDA sample carton
 - Place filled cartons for inspection in the designated area for USDA sample collection
 - Confirm number of fruit collected & packaged into cartons with the number fruit in the RAD print out to confirm the number of fruit dropped has been collected into the sample.

¹ “Designated staff” are those listed on the MAF approved Organisation’s register of competent phytosanitary staff and may be registered as phytosanitary inspectors.

Note: Training in these activities and risk mitigation measures/requirements will be required prior to a designated staff members “competence” being validated.

- d) The automatic tray dispenser area is to be modified such that fruit cannot be placed on trays before trays move through to automatic tray filling sample packing station.
- e) The prescribed IQP sample fruit size to be a size near the sizes normally destined for the USA and near the average fruit size to be expected for the variety being packed.

5.3.4 In-line Carton Sampling (ICS)

In this option sample cartons are electronically selected and automatically labelled as a USDA inspection sample carton by computer controlled carton-labelling equipment.

The operator must document in their MAF-BNZ approved system their method of:

- i) Selecting sample cartons randomly and symmetrically throughout the lot (i.e. select every nth carton), or the sample cartons throughout the lot may come from the one USDA size,
- ii) Sequentially numbering cartons in line using automatic labelling equipment.
- iii) Labelling USDA sample cartons with the allocated USDA lot number.
- iv) Uniquely identifying each USDA sample carton (i.e. 1-200).
- v) Notifying their IVA where the lots and associated USDA sample are being stored.
- vi) Securing lots from substitution and pest contamination.
- vii) Segregating lots for USA from other non-USA fruit after sampling.

Note: If sampling from one fruit size, the sample fruit size is to be a size near the sizes normally destined for the USA and near the average fruit size to be expected for the variety being packed.

5.4 Removal of Fruit from the USDA Lot after Sampling

- i) The operator may elect to remove some packages/pallets associated with a production site from a USDA lot while it is being built and after the sample has been taken. If this action is taken, all the associated fruit already within the sample **MUST REMAIN IN THE USDA INSPECTION SAMPLE**.
- ii) The operator is to inform the USDA inspector the identification of the fruit and the reason the fruit has been removed from the lot. When the USDA inspector is satisfied that there is none of the identified fruit in the USDA lot, they will remove the associated samples from the USDA inspection

sample.

- iii) This option is only available where the fruit from each production site within the sample are clearly segregated and labelled.
- iv) The operator must ensure the sample will still contain at least the minimum number of fruit **after** the fruit from the affected production site is removed.

6.0 USDA Lot and sample Identification

6.1 USDA lot identification

- i) Each pallet within a USDA lot must have a pallet card which:
 - has a unique number,
 - is permanently affixed using adhesive,
 - is clearly marked with the appropriate USDA lot number and the accredited sampler's unique identification code/number (standard package sampling only).
 - contains the packer identification (unless this information is already contained on export packages).

- ii) The unique USDA lot number must either be
 - hand stamped (using red ink) with lettering not less than 10mm in height
 - or
 - printed by a packing line printer (black ink may be used).

- iii) The USDA lot identification number must consist of:
 - a unique two letter prefix allocated by an IVA to each exporter, and
 - a combination of four alpha/numerical numbers allocated by the exporter for combining with the 2 letter prefix codes to create a unique alpha/numeric identification code for each lot.

iv) Identification of Grower Production Site Code on Export Packages

Each package must be identified with at least the growers registered production site code.

6.2 USDA Sample Package Identification

Each package in the USDA Inspection sample must be identified with the:

- USDA lot number
- Sampler identification (standard package sampling only).
- Registered production site.
- Package sample number i.e. 1-200 (In-line carton sampling only).

As soon as a sample pallet is complete, or when a lot is complete, each sample pallet / part pallet must be:

- Secured to prevent substitution (e.g. strapped, shrink wrapped, shrouded etc).
- Labeled with the lot number and clearly state:
“USDA Sample Cartons”.

7.0 USDA/MAF INSPECTION FACILITIES

7.1 Facility Approval & Operations

- i) The IVA must approve the USDA/MAF-BNZ inspection facilities, and equipment at each USDA pre-clearance inspection location pre-season as the specifications in section 7.2. Once an inspection site is approved, it will be listed in the register on the MAF-BNZ Website.
- ii) The facility operator must provide the USDA and the IVA with assistance required for obtaining the samples, preparation of the samples for inspection and repacking.

iii) The entire USDA inspection sample for a Lot must be within easy (walking) access to the USDA inspector and stored at one location.

7.2 Inspection Facility Specifications and Equipment

- i) The inspection facility needs to provide an office area containing:
 - Desk
 - Telephone (or easy access to).
 - Fax machine (or easy access to).
 - Photocopier (or easy access to).
- ii) The fruit inspection work area must be:
 - Away from traffic areas,
 - Have ample room for at least four inspectors and at least four support staff.
 - An entry for pallets of fruit.
 - The inspection facility must be capable of containing at least two pallets on the floor within the inspection area (i.e. one containing packages of fruit for inspection and the other to place inspected

packages on).

Note: The pallet containing the USDA inspection packages being examined must be visible to the USDA inspector at all times during the inspection process.

- Stools for inspectors seating while inspecting.
- Lighting at 1000 lux over the entire inspection area of each table.

- A minimum of 2 inspection tables with white tops, approximately 2.5 metres x 1.2 metres to accommodate a minimum of 4 inspectors.
- Binocular Microscope 10 X 21. With a 3.5 X enlarger.
- Tabletop heat lamp (for warming samples).
- Rubber Mats for standing on.
- The inspection area is to be kept clean and free from other material.

Note: Inspection tables and their overhead lighting systems are to be in compliance with OSH requirements and need to be adjustable to accommodate the various heights of Inspectors

8.0 USDA Inspection Technique

The USDA/MAF-BNZ inspection techniques to be adopted are defined below:

- 1) Set trays out in the order of inspection. The fruit in each tray is to be inspected for the presence of pest and disease in a systematic manner.
- 2) Examine the cheek of each fruit and carefully examine the calyx and stem areas for any visible pests or signs and symptoms of pests.
- 3) Where a pest is clearly visible it should be collected in the appropriate manner for the pest found. This must ensure that no damage will be caused to the pest.
- 4) Ensure all live pests are presented to the USDA Inspector for a decision as to the actionable status or not.
- 5) Where symptoms or signs such as, frass, webbing, puncture marks, chewing's, sooty mould, mealy or partially concealed insects are visible, then the fruit must be carefully cut open for viewing and verification of the pests presence.
- 6) Packaging is to be inspected for pests by carefully examining the interior surfaces of the container and fruit trays.
- 7) Determine the viability of the pest. Only live pests are to be actioned. Where doubt exists as to the pest's viability place the pest concerned under a heat lamp for a period of 5-10 minutes to activity (e.g. movement

of mouthparts)

8) Place any live pests found into a specimen bottle, (one specimen per bottle/vial, unless the specimens are found on the same unit) and label with the following: Lot Number, Grower Number, Variety, Pack Date and Count.

9) Send pest for identification to a MAF accredited pest identifier if required by the USDA inspector.

10) The pest must be packaged in the appropriate manner so that it does not deteriorate in transit to the Diagnostic Laboratory.

11) Update appropriate records e.g. Lot Status Form.

9.0 PROCESSING LOTS AFTER USDA INSPECTION

9.1 Processing a Passed Lot

Once a lot has been inspected and passed by a USDA inspector, the USDA inspector completes and signs the lot status form (refer section 10.1).

Should an exporter decide to intervene and process a passed Lot, the appropriate IVA is to be notified of the intended action at least 3 days prior to the Lot being actioned.

9.2 Processing a Failed Lot

If a lot fails USDA inspection, the USDA inspector records the reason for the lot failure and signs the lot status form.

9.3 Investigation and Reporting on USDA Failed Lot

The IVA is to coordinate a traceback for each failed lot to determine the cause of the interception and identify corrective actions to minimise the chance of any further interceptions occurring through that particular supply pathway.

Where there is more than one interception of an actionable quarantine pest from the same source (i.e. production site), the IVA is to suspend that source of supply from the USDA pre-clearance programme in consultation with the USDA Inspector, until agreed corrective actions have been implemented and verified by the IVA.

10.0 DOCUMENTATION

10.1 The Lot Status Form

A “Lot Status Form” is to be completed for every USDA/IVA inspection.

The minimum details to be recorded on the “Lot status form” include:

- USDA Lot number
- Date of sampling
- Number of pallets (and attach a list of pallet card numbers making up the lot) and number of cartons/bins
- Number of USDA samples
- The Samplers names, number and signature
- Exporter contact details.
- Inspection date
- Lot status
- Pest diagnostic details: diagnostic number, pest description, registered production site, packer, pest identification, identifier, date received and USA quarantine status (i.e. Actionable or Non actionable).

At the completion of each USDA inspection, the form is to be signed and dated by the USDA inspector.

10.2 Exporter Inventory Control System

- 1) The exporter must implement an inventory control system which provides USDA/MAF-BNZ trace ability of the volumes of packages (e.g. cartons, trays, bins or pallets) to a USDA Lot number at all times.
 - 2) Within forty-eight hours of loading a vessel(s) and/or sea/air containers, exporters are to provide the USDA inspector with a copy of their inventory control report for their USDA inspected and passed Lots that displays:
 - a) **Inwards:** by passed Lot number, number of packages and their place of storage,
 - b) **Outwards:** for each PPQ 203, the number of packages and the number of USDA inspected and passed packages exported to “Other Markets”.
 - c) Remaining Stock - the number of USDA inspected and passed packages by variety remaining in storage and their place of storage within New Zealand.

Note: The Exporter Inventory Control System is a backup to the visual Lot numbers on Pallet cards.

10.3 PPQ 203 Forms

Exporters are to complete PPQ 203's forms (Foreign Site Certificates of Inspection and/or Treatment) for each export consignment and each USA port of discharge. On completion of each form, the exporter is to forward an electronic copy of the PPQ 203 Form to their IVA by attaching the Form to an Email along with a copy of the "Exporters Inventory Control".

Note:

- i) An electronic template of the PPQ 203 form is available from the IVAs (refer Appendix 3 for an example).

- ii) IVAs are to print out the PPQ 203 forms and updated "Exporters Inventory Control" and present both documents to the USDA Officer for verification and signing. The original PPQ 203 form must be printed on pale yellow paper and accompanied by at least two white copies (this to retain the same colour sequence as per the forms provided by the USDA). Additional copies, if required by the exporter, can be taken from a signed copy.

- iii) Exporters are to allocate/add a unique number for the PPQ 203. The number must start with the two letter exporter prefix allocated by PNZ, followed by the year code, then a unique number (e.g. AB051234).

- iv) The USDA Inspectors are responsible for verifying the information on the PPQ 203 form and signing the form as true and correct.

10.4 Master PPQ 203

- 1) This document is actioned by the USDA Officers at the completion of the USDA Inspection phase of the pre-clearance programme in New Zealand.

- 2) Refer to 4.1.2 (iv) for information on the preparation of the Master PPQ 203.

10.5 Details of Loading Form

Exporters must provide a completed "Details of Loading Form" for each consignment to be shipped once the USDA officer is no longer in the country.

An electronic copy of the "Details of Loading Form" is available from the

IVAs.

Exporters preparing the “Details of Loading Form” are to enter into the area designated for “USDA Certificate Number” the PPQ 203 number of the Master PPQ 203 completed by the USDA Inspector.

The “Details of Loading Form” must be presented to the IVA for checking and signing at the same time as the “Master PPQ 203” and the “Exporter Inventory Control” documents are presented. The “Details of Loading Form”, once verified and signed by the IVA, must accompany a copy of the appropriate Master USDA PPQ 203 form to the USA. These forms are to be couriered or posted to the Officer in Charge at the Port of Arrival for the fruit in the USA to ensure the time of arrival is well in advance of the shipment arriving at the port.

11.0 SAFEGUARD MEASURES

Any USDA lot, or part thereof, rejected by the USDA shall not be re-presented for export to the US market.

11.1 Storage Facility Requirements

All storage facilities being utilised for the storage of USDA lots must:

- be registered with MAF via one of the IVAs ,
- provide an insect proof storage environment
- **Provide an insect proofed load out facility.**

Registered storage facility operators must advise their IVA whenever a USDA pre-cleared lot is transferred to another registered storage facility.

11.1.1 Identification of USDA lots in Storage

All USDA lots assembled for the USDA inspection and/or passed lots shall be clearly identified as follows:

- A strip of coloured plastic tape is to be placed around the entire USDA-lot, and
- A RED CARD at least 20 cms by 30 cms (i.e. A4) is to be placed (at eye level) in front of the USDA lot giving USDA lot details including USDA lot number.

11.1.2 Spacing of Product in Storage

- i) Non-pre-cleared USDA-lots must be stacked at least 4 foot (1.2m) apart on all sides (other than against a wall).

ii) A spacing of 850mm between USDA passed lots and non pre-cleared USDA lots (or non pre-cleared pallets from different Lots) is allowable within vertical coolstore racking systems if the fruit has reached storage temperature prior to being placed in the racking system.

iii) Passed USDA-Lots may be amalgamated within a coolstore.

iv) Fruit for other markets may be stored in the same coolstore room as a USDA-lot but must be stacked at least 4 foot (1.2m) apart from pre-cleared and non pre-cleared USDA lots.

11.1.3 Product on Hold

Where an unidentified or unclassified pest is found, the lot shall be placed on hold until the pest has been identified and classified by USDA, at which time it will either pass or fail.

Note: An exporter may chose to withdraw a lot that is on hold from the USDA programme and arrange for this lot to be exported to another market.

Product placed on “Hold” must be clearly identified with the plastic hazard tape remaining in place and HOLD signs are to be placed on the first pallet of each row.

11.1.4. Failed Product

Any Lot, or part thereof, that has failed USDA pre-clearance inspection must:

- Not be re-presented for USDA pre-clearance inspection.
- Have the USDA lot identification immediately removed, and
- Be removed from the cool storage room (i.e. the storage room containing USDA-lots passed by the USDA or being built/awaiting inspection) within 48 hours (or by agreement with the USDA inspector and IVA) of being notified of the failure.

11.2 Safeguards for Transporting Pre-cleared Lots for Vessel, Sea and Air Container Loading

Documentation for shipments of passed fruit will be completed as outlined in Appendix 1.

All pre-cleared fruit must only be transported within NZ on fully covered vehicle(s) and be segregated from non-pre-cleared fruit by a gap of at least 1.2 metres at all times.

The USDA and/or the IVA will:

- a) Monitor loading of product onto USA destined vessels to verify only passed USDA Lots are loaded,
- b) Check the container and loading area are free from hitch hiking and flying pests.
- c) Supervise the loading of USA destined containers to verify only passed USDA Lots are loaded.

For any pallet that is returned from the port for not meeting USDA requirements, the pallet number is to be:

- noted on arrival within the storage facility records,
- placed into non-USDA stock, and
- all USA identification defaced.

Note:

Pre-cleared fruit in sea or air containers, will lose its pre-clearance status if the container's seal is broken in the absence of either USDA or the IVA.

USDA or IVA staff **must** supervise any transfer of fruit from one container to another. A transfer requires a new container seal and a new PPQ203 form to be issued with the new container numbers.

11.3 USDA and/or IVA Monitoring of Safeguarding Measures

11.3.1 Sea freight

USDA inspectors are to monitor part of a vessel loading early in their assignment. Preference is for this monitoring to be during a night loading to assess the risk of pest contamination at this time of loading.

The USDA inspectors (or IVA staff) are to monitor all vessel loadings, with each monitoring visit not to exceed 2 hours.

11.3.2 Air Freight

The USDA and or the IVA are required to supervise the loading of pre-cleared packages of pipfruit into USA destined air-freight containers.

Note: The fruit must be safeguarded against infestation by either the air-freight container or the individual packages within the air-freight consignment being insect proof.

11.3.3 Coolstores

The USDA, or an IVA representative will monitor maintenance of the cool storage segregation and security requirements.

Each cool storage facility is to be visited a minimum of at least once for each tour by a USDA Officer. The visit will be to confirm export product associated with the USDA Pre-clearance programme is correctly labelled, packaged and segregated from non-complying product. Subsequent visits may be needed if discrepancies are noted or if the USDA Officer determines the need.

12.0 TRANSIT OF FRUIT TO CANADA

Pipfruit destined for Canada may be transported on the same vessel as USA pre-cleared fruit as long as the integrity and separation of the fruit is maintained.

To avoid any confusion at the US port of entry, fruit for Canada must be loaded in to separate decks/containers from US fruit.

In an emergency situation where the vessel is intended to be fully loaded, authorisation may be obtained to load Canada and US fruit in the same deck provided there is at least a three foot barrier between the Lots (lots) of fruit.

It is extremely important that the fruit not be co-mingled during loading and discharging.

Note:

Transit permits are now issued by **USDA-APHIS Riverdale (includes permits for transiting California)**. Fruit will be required to be placed in approved areas and get to Canada under US Customs bond. APHIS will seal the transporting vehicle. Because of manpower constraints at USA major ports of entry, exporters are to have their importers in the US contact the local offices for permits, conditions and guidance on certification requirements. Pipfruit must be inspected and certified as meeting the phytosanitary requirements of Canada)

13.0 PROGRAMME VIOLATIONS

13.1 Investigation & Corrective Action

Failure on the part of an exporter, packhouse, coolstore or grower to comply with this Workplan, will result in MAF-BNZ requiring an IVA to:

- Investigate the non-compliance with the appropriate operator(s).
- Identify and agree on appropriate corrective action(s).
- Verify the agreed corrective actions have been implemented.
- Report verification findings to MAF-BNZ.

Failure to resolve issues identified or repeated non-compliance detections may lead to MAF-BNZ suspending the appropriate parties participation in the programme.

14.0 PROGRAMME REVIEW AND EVALUATION

14.1 Annual Review

MAF-BNZ will undertake a review and evaluation of the programme in conjunction with IVAs and PNZ at the end of each season. A timetable for action for key events will be reviewed and agreed (refer Appendix 2).

USDA Inspector reports provided to USDA/APHIS will be copied to MAF-BNZ for consultation with NZ parties to ensure understanding of issues raised.

14.2 Programme Suspension/Termination

If any operational year the programme is suspended or terminated for biological reasons, MAF-BNZ (for the host country) must provide, in writing, details of proposed corrective actions prior to USDA-APHIS agreeing to reactivation.

Appendix 1: GUIDE AS TO WHO INITIATES VARIOUS FORMS & THE FORMS DISTRIBUTION

USDA Inspector	FORM	Initiated by	Distributed to
Prior to inspection of a Lot	Lot status form	Prepared by the Exporter, their packer or coolstore facility operator	The IVA & the USDA inspector
Shipping			
USDA Inspector Present in New Zealand	PPQ 203 (annotated with ETA) Exporter Inventory control Form. NZ MAF Phytosanitary Certificate (Optional)	Initiated by Exporter & Emailed to their IVA. Prepared by Exporter & Emailed to their IVA. Prepared by the exporter, verified by the IVA & issued by MAF	IVA who: 1. Emails to USDA destinations as per USDA Inspector request. 2. Prints out original yellow copy for signing by USDA inspector & then forwarded to USDA port of arrival. 3. Copied to: - USDA inspector, - IVA, - Exporter Head Office, Original to USDA port of arrival, copy to exporter USDA inspector and copy held in MAF Phyto Ecert.
USDA Inspector - Not present in New Zealand	Master PPQ 203 Details of loading Exporter Inventory Control record NZ MAF Phytosanitary Certificate (optional)	Initiated by Exporter Prepared by the Exporter (verified & signed by The IVA) Maintained by the Exporter The exporter, verified by the IVA and issued by MAF	USDA Inspector who verifies data & signs as appropriate. USDA port of arrival (yellow copy) Copied to: -Local Pre-clearance IVA, -Exporter Head Office, Accompany PPQ 203 IVA Original to USDA port of arrival Copy to exporter and electronic copy held in MAF Phyto Ecert

Note: i) PPQ203 Consignee Address: Needs to show central US address for US-bound product (Vancouver address for US fruit that is going into bond in the USA)

ii)*For consignments of apples and pears that are transhipped from the USA to Canada, the additional declaration required by Ag Canada for freedom from light brown apple moth may be included on the phytosanitary certificate issued for the USA.

Appendix 2: TIMETABLE.

Time	Responsibility	Action
September M	AF-BNZ, PNZ & IVAs	Review work plan.
By 31 October	USDA MAF-BNZ	Advise MAF-BNZ of any changes to its quarantine and inspection specifications including any updated pest categorisations to the list of pests “Pest and Diseases occurring on NZ Pip fruit”. MAF-BNZ to advise the USDA of any changes to its plant health export certification requirements and procedures.
November	USDA & MAF-BNZ in consultation with PNZ	Confirm the annual Work Plan for next year’s pre-clearance program.
By 30 November	PNZ	Notify USDA (cc MAF-BNZ) their intent to participate in the pre-clearance program for the next season.
By the 1st December	Exporter	Register with PNZ their intention to participate in pre-clearance programme the following season
By December	PNZ	Initiates funding arrangements and completes “Co-operators” contract for pre-clearance programme with USDA
By 20 January	PNZ	Confirm the pre-clearance program start and likely finish date with USDA. Complete arrangements for visiting USDA staff and a copy sent to MAF-BNZ.
By 10 February	PNZ	Confirm USDA accommodation, induction and internal travel arrangements (cc to MAF-BNZ).

Appendix 3. EXAMPLE USDA PPQ 203 FORM

U.S DEPARTMENT OF AGRICULTURE ANIMAL AND PLANT HEALTH INSPECTION SERVICE PLANT PROTECTION AND QUARANTINE FOREIGN SITE CERTIFICATE OF INSPECTION AND/OR TREATMENT	1. CERTIFICATE No.	2. COUNTRY OF ORIGIN UPPER CASE
	3. DATE LOADED <i>e.g .15 Mar 2007</i>	4. FOREIGN PORT OF EXPORT
5. CARRIER IDENTIFICATION	6. U.S PORT OF ENTRY	
7. SHIPPER (<i>Name & Address</i>)	8. CONSIGNEE (<i>Name & Address - Include Zip Code</i>)	
9. COMMODITY <i>e.g Apples (no variety or other details required)</i>	10. NO.OF CONTAINERS (Identify as box, sack, ½ Bruce box, flat, cardboard box etc)	11. CONTAINER IDENTIFICATION MARKS
ALCM, Dasyneura mali present, Not suitable for California.		
Or Shipment inspected and no ALCM, Dasyneura mali found.		
12. LOCATION OF INSPECTION AND/OR TREATMENT <i>Inspection Site Hastings/Nelson</i>	13. DATE <i>e.g .15 March 2007</i>	
This certifies that the shipment described above has been inspected and/or treated in accordance with agricultural requirements for entry into the United States.		
14. SIGNATURE OF PLANT PROTECTION AND QUARANTINE OFFICER	15. DATE ISSUED <i>e.g .15 Mar 2007</i>	

PPQ FORM 203 (AUG 78)