

BIOSECURITY NEW ZEALAND EXPORT CERTIFICATION STANDARDS

Note: An Organisation = A company seeking to document and implement a system for approval to undertake specific phytosanitary certification activities as part of the companies normal operations.

1. Guide to the Revised Standards

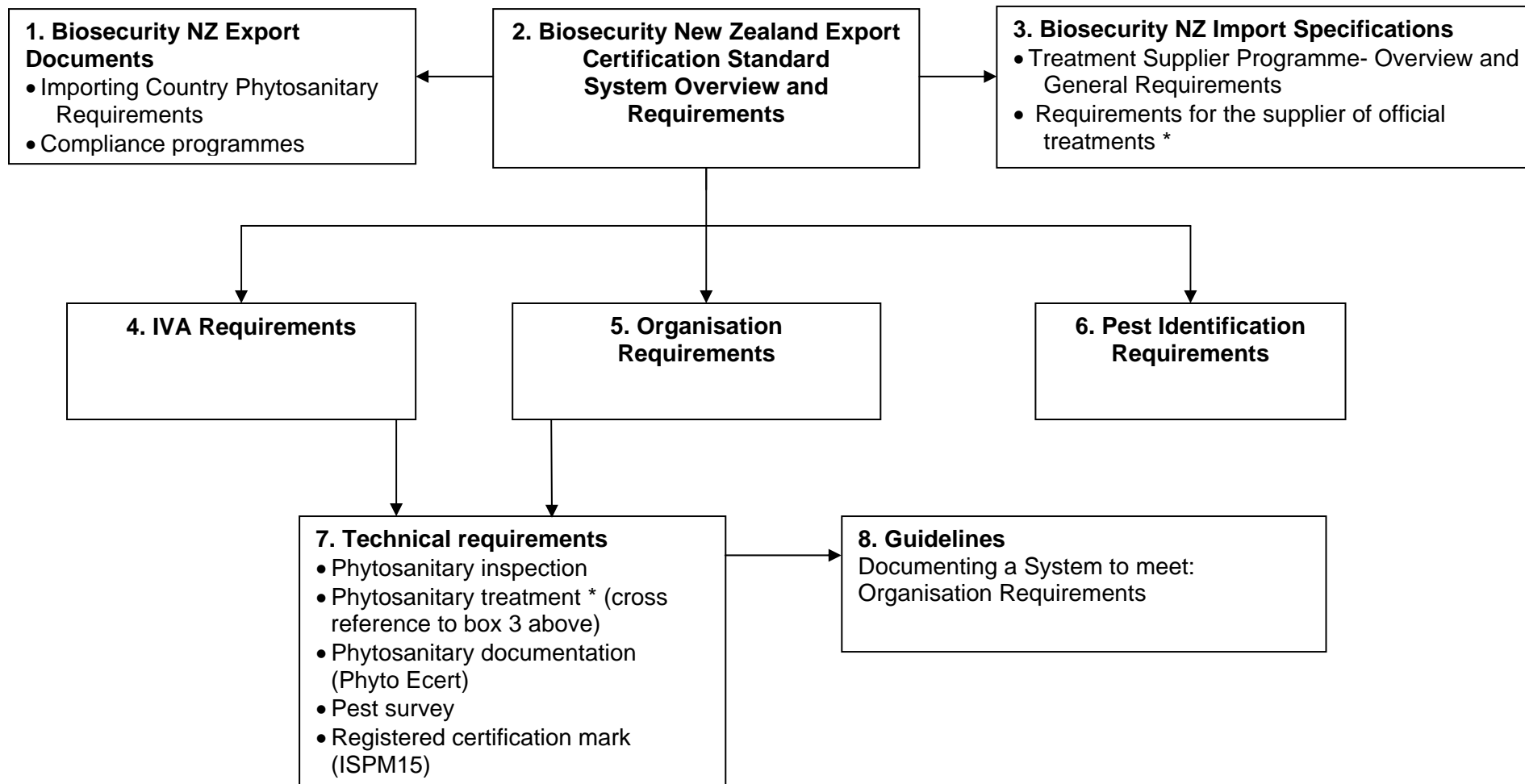
As a result of the recent review of Biosecurity New Zealand Phytosanitary certification system a new suite of standards has been developed (refer to Figure 1).

The suite of standards operates under an overarching system standard. Within the suite, there are two primary standards which govern the delegation of authority to IVAs and to organisations. In addition there is a menu of technical requirements covering the scope of activities to be undertaken.

The standards are:

- Based upon international treaty and phytosanitary standard requirements for the trade in plants and plant products, including forestry.
- Designed to manage Biosecurity New Zealand's risks in delegating authority to third parties and organisation.
- Outcome focused to empower IVAs and organisations to develop innovative approaches and systems which recognise the unique operating characteristics of their business
- Structured so that material is not duplicated across multiple standards to improve clarity.

Figure 1: Biosecurity New Zealand Export Certification Standards



1.1 System Overview and Requirements Standard

This is a new standard that describes the International and New Zealand context for the export certification system

The standard contains:

- policies
- procedures
- specifications
- primary roles and responsibilities for participating parties involved in export certification
- outcomes required from the system

The standard clarifies the roles and responsibilities of Biosecurity New Zealand, IVAs and organisations.

This standard should be read by all IVAs and organisations prior to developing their system.

1.2 IVA Requirements Standard

This standard defines the requirements to be met by an Independent Verification Agency (IVA) to gain authorisation for the provision of export phytosanitary certification services on behalf of Biosecurity New Zealand.

A key change within the revised certification system is that IVAs must be accredited to ISO 17020

The IVA standard is structured as:

- Section 1 Introduction
- Section 2 Authorisation processes
- Section 3 System requirements for ISO 17020
 - Competency
 - Records
 - Reporting
- Section 4 Menu of service options

1.3 Organisation Requirements Standard

This standard defines the requirements to be met by horticultural, arable and forestry organisations to gain approval to undertake specific export phytosanitary activities.

Organisations meeting these requirements operate under formally delegated authority from MAF Biosecurity New Zealand.

Organisations are required to develop a HACCP based system which manages the phytosanitary risks appropriate to their product.

This shall be undertaken through a formal process of

- i. Identification of their product pathway(s);
- ii. Identification of hazards and risks within this pathway, and the Critical Control Points (CCP) where hazards and risks are managed;
- iii. Development of procedures for activities within each CCP to control, prevent, remove or reduce the identified hazards and risks.

These procedures form the core of the organisation's operating system and in turn form the basis for determining staff training and competency.

All organisation's systems, will be audited by the selected IVA to ensure compliance with organisations documented procedures and Biosecurity New Zealand standards and specifications

The standard is structured as:

Section 1 Introduction

Section 2 Approval process

Section 3 System requirements

- reporting
- records
- competency
- supplier audit
- certification service options
- operating procedures

Section 4 Audit frequency and scope for organisations

Some key differences for organisations under the revised standards are identified in Table 1. This list is not exhaustive.

1.4 Technical Requirements

The following technical standards are now stand alone documents. The development of this new series of technical standards allows organisations and IVAs to focus on documenting procedures for the specific phytosanitary activities unique to their scope of operation.

Key change within the revised technical standards:

- is the identification of unique competency requirements which are specific to the phytosanitary activity undertaken
- technical standards which are outcome focussed

1.4.1 *Phytosanitary Inspection*

This standard specifies the minimum technical requirements for completion of phytosanitary inspections on behalf of Biosecurity New Zealand.

1.4.2 Phytosanitary Treatment

The standard 'Requirements for the Supplier of Official Treatments' has been developed primarily for organisations whose main activity is the supply of official treatments for import and export to other organisations.

Organisations carrying out phytosanitary treatments need to refer to specific sections in this standard which contain requirements for how the treatments are to be carried out and validated. The specific sections are identified in the Organisation Requirements standard.

1.4.3 Phytosanitary Documentation (Phyto Ecert)

This standard specifies the minimum technical requirements for the participation in, operation and production of phytosanitary certificates on the Biosecurity New Zealand Phyto Ecert System.

There are no changes in requirements for organisations. IVA specifications have been transferred to the new IVA standard.

1.4.4 Pest Survey

This standard specifies the technical requirements for the design, implementation, and verification of pest surveys for the provision of production site or pest free additional declarations where the organism is known to occur in New Zealand.

1.4.5 Registered Certification Mark (ISPM15)

This is a new standard that specifies the minimum technical requirements to facilitate the application of a MAF registered certification mark as per ISPM 15 to meet importing country requirements.

1.5 A Guide to Forestry Company Implementation

This section outlines how Biosecurity New Zealand perceives the revised standards will be adopted by the forest product export industry. This outline has been prepared on the basis of 3 broad organisational groupings within the forestry sector, and accordingly, there is a degree of repetitiveness as some aspects such as inspection are dealt with in each group.

1.5.1 Log Exporters

Phytosanitary Inspection

Currently log exporters obtain an IVA End Point Consignment Inspection (EPCI) rather than becoming Biosecurity New Zealand approved to inspect the logs prior to export. Accredited IVAs carry out these EPCI at the port of export. This current operating process provides the basis for any declarations that are required on the Phytosanitary Certificate.

In future, log exporters may seek approval to undertake these phytosanitary inspection activities, or continue to operate as at present.

Treatment

Where logs require fumigation to meet importing country requirements, the official treatment must be carried out by either a Biosecurity New Zealand approved treatment supplier or by a treatment supplier who is under direct supervision from an accredited IVA.

Documentation (Phyto Ecert)

Log exporters may wish to be approved by Biosecurity New Zealand for phytosanitary documentation as is currently the case for many log exporters. Ultimately, log exporters who become approved organisations with recognition for providing export documentation services, will become eligible to print the phytosanitary certificate at an approved location. Log exporters who are not approved for phytosanitary documentation services must have their phytosanitary certificates printed by the verifying IVA.

Please note; Biosecurity have imposed a hold on approving any further print locations while print security concerns remain unsolved, but organisations may still register to participate on Phyto Ecert.

1.5.2 Timber/Manufactured Board Product Exporters

As organisations in this group have very detailed procedures in place for the production of their product, it is envisaged that these organisations are the most likely to establish systems under the revised standards.

Treatments

Where an importing country requires a treatment that is carried out during processing, such as heat treatment or kiln sterilisation, the processing company completing the treatment must become approved by Biosecurity New Zealand to apply the official treatment. Approval must be sought under the 'Organisation Requirements' standard or under the 'Requirements for the Supplier of Official Treatments' standard. 100 percent supervision of official treatments by an accredited IVA will remain as an option for companies who do not wish to become Biosecurity New Zealand approved.

Companies who seek approval under the 'Organisation Requirements' standard must also address specific requirements set in the 'Requirements for the Supplier of Official Treatments' standard. The sections to be addressed are identified within the 'Organisation Requirements' standard.

Exercising this option allows the organisation to seek approval from Biosecurity New Zealand to undertake additional specified phytosanitary activities covered within the technical requirements.

Note: External treatments, such as methyl bromide fumigation, will need to be carried out by a Biosecurity New Zealand approved treatment supplier or by a treatment supplier who is under 100 percent supervision from an accredited IVA.

Phytosanitary Inspection

Approval under the 'Organisation Requirement' standard would allow the organisation to seek approval to the Phytosanitary Inspection Technical Requirements. This approval would allow an organisation to inspect export product for phytosanitary concerns throughout the production process.

The organisation would need to document and implement a system that meets the requirements of the standard and that addresses the company's individual operating needs and critical control points. This could remove accredited IVA inspection requirements prior to export. However, IVA inspection may remain as part of the company's system for Post Inspection Product Security (PIPS).

Documentation (Phyto Ecert)

A company approved under the 'Organisation Requirement' standard will have the option of approval to carry out Phyto Ecert documentation activities (printing Phyto Ecerts at the production site).

Ultimately, approved organisations with recognition for providing export documentation services, will become eligible to print the phytosanitary certificate at an approved location. Organisations who are not approved for phytosanitary documentation services must have their phytosanitary certificates printed by the verifying IVA.

While many forestry companies are already approved for export documentation services and certificate printing, these companies must seek and be re-approved to the revised standards to maintain this print approval

Please note; Biosecurity have imposed a hold on approving any further print locations while print security concerns remain unsolved, but organisations may still register to participate on Phyto Ecert.

Wooden Packaging

Processing companies who create, treat and/or mark wood packaging material in accordance with ISPM 15 will now do so with approval to the MAF Registered Certification Mark (ISPM 15) Technical Requirements and the Organisation Requirements Standard. See 1.5.3 below for more detail.

Audit

All of the activities for which an organisation becomes approved for under the Organisation Requirements Standards will be audited on the same IVA audit regime. Combining all phytosanitary activities within an organisations system has the potential to influence the efficiency of the IVA auditing process.

1.5.3 Wood Packaging Manufacturers

Organisations within this group seeking Biosecurity New Zealand approval to apply the MAF Registered Certification Mark (ISPM 15) must meet the requirements as follows:

Treatment Suppliers

All treatment suppliers applying an official treatment to wood packaging that is intended to be marked with the MAF Registered Certification Mark (ISPM 15) must be approved under the Biosecurity New Zealand Standard “Requirements for the Supplier of Official Treatments”.

If the treatment supplier is also seeking Biosecurity New Zealand approval to apply the MAF Registered Certification Mark, the treatment supplier must also document within their system procedures meeting the requirements of the Biosecurity New Zealand Standard ‘Technical Requirements: Registered Certification Mark (ISPM 15)’.

A Biosecurity New Zealand approved treatment supplier is able to on sell treated wood packaging material to approved Registered Certification Mark applicators (without the treatment supplier having applied their Registered Certification Mark) as long as the wood packaging is traceable to the treatment suppliers official treatment. The Biosecurity New Zealand approved mark applicator receiving the treated wood packaging could then apply their Biosecurity New Zealand Registered Certification Mark to the treated wood packaging.

Wood Packaging Manufacturers Undertaking Official Treatment (e.g. a sawmill)

This section involves those organisations undertaking treatments of wood packaging material who may be seeking Biosecurity New Zealand approval to apply the Registered Certification Mark.

Organisations in this category must gain Biosecurity New Zealand approval under the standard “Organisation Requirements” and in addition address specific requirements in the following standards:

- Requirements for the Supplier of Official Treatments (the sections to be addressed are identified within the standard “Organisation Requirements”), and
- Technical Requirements: MAF Registered Certification Mark (ISPM 15).

This will allow the organisation to run their wood packaging system in conjunction with the company’s additional approved phytosanitary activities.

Wood Packaging Manufacturers not Undertaking Official Treatments

Organisation in this group seeking Biosecurity New Zealand approval to apply the Registered Certification Mark, but who do not wish to become approved treatment suppliers, must be approved under the standard ‘Organisation Requirements’ and the ‘Technical Requirements: Registered Certification Mark (ISPM 15)’.

These organisations must source their timber supplies (treated according to ISPM 15) from a Biosecurity New Zealand approved treatment supplier/organisation.

Both the supplier and receiver of the wood packaging material must provide traceability for the timber to the appropriate official treatment.

1.6 Areas of Interest for Forestry Organisations

Some key areas of interest and clarification for forestry organisations seeking approval from Biosecurity New Zealand.

Table 1 Key areas of interest for forestry organisations

Revised Standard	Clarification/Interest Areas
<i>Operating Procedures</i>	
Three step HACCP based approach to develop documented systems	Will allow an organisation to document procedures to manage the phytosanitary risks associated with export product. This could cut or reduce the current requirements for some external IVA product inspections and monitoring.
Official treatments will be regulated under the Biosecurity New Zealand standard 'Requirements for the Supplier of Official Treatments'.	<p>Provides the opportunity for the use of any Biosecurity New Zealand approved treatment supplier.</p> <p>If the treatment supplier being used is approved by Biosecurity New Zealand, 100 percent supervision of the treatment by an accredited IVA will not be required.</p> <p>Greater regulation of official treatments that occur within the product production process. E.g. kiln sterilisation. Unless supervised by an accredited IVA, all treatment suppliers must meet the relevant requirements set in the standard 'Requirements for the Supplier of Official Treatments'.</p>
Registered Certification Mark (ISPM15)	<p>Timber used in wood packaging must be treated by a Biosecurity New Zealand approved treatment supplier.</p> <p>Wood packaging may have the Registered Certification Mark applied by a Biosecurity New Zealand approved mark applicator. The mark applicator must be able to prove through documentation and records that the wood packaging material has been treated according to ISPM 15 by a Biosecurity New Zealand approved treatment supplier. This does not need to be the company applying the registered certification mark.</p>
Phytosanitary Inspection	<p>Allows organisations to become officially recognised to undertake phytosanitary inspection of their own product, and receive MAF phytosanitary certification based on these inspections.</p> <p>Approval could remove the need for</p>

Revised Standard	Clarification/Interest Areas
	accredited IVA inspection of product at the port, unless the organisation decides to continue to operate with IVA inspection (e.g. IVA phytosanitary inspections may still be used, particularly where product has been stored at the port for some time).
Phytosanitary Documentation (Phyto Ecert)	Approval to the Phytosanitary Documentation Technical Requirements will enable organisations to be considered for printing phytosanitary certificates at their nominated print location.
<i>Audit frequency and scope</i>	
For a new organisation to be approved:	Initial system audit which includes an assessment of each phytosanitary inspection activity location.
<p>Audit frequency is dependent on product type. Two risk categories created:</p> <p>Risk category 1: Relates to organisations operating treatments &/or processing processes that render pests non-viable as per the confidence levels that would otherwise be gained through phytosanitary inspection.</p> <p>One annual system audit, and 3 surveillance audits per year.</p> <p>Risk category 2: Relates to organisation undertaking phytosanitary inspection activities (includes preparation of phytosanitary certificate requests).</p> <p>One annual system audit and 6 surveillance audits per year</p>	<p>Approved organisations will operate under an IVA audit process rather than direct supervision by an accredited IVA.</p> <p>One year without a critical non compliance makes the organisation eligible for a reduced audit frequency of 1 system audit and 1 surveillance audit per year.</p> <p>One year without a critical non compliance makes the organisation eligible for a reduced audit frequency of 1 system audit and 3 surveillance audits per year.</p>
<i>Non compliance (NC)</i>	
<p>Two categories of NC</p> <ul style="list-style-type: none"> • Critical • Other 	These non-conformances vary from the current QA scheme.
Other non-compliance	Addressed through a negotiated corrective action process with an IVA
Critical non-compliance	Can be handled by daily audits or End Point

Revised Standard	Clarification/Interest Areas
Two or more critical NC within any 12 month period.	<p>Consignment Inspection (EPCI) for 3 days</p> <p>Revert to EPCI revert to EPCI following Biosecurity New Zealand's termination of the organisations authorisation until the organisation initiates and completes the full approval process again.</p>
<i>Staff training and competency assessment</i>	
Approval of an organisations system of staff competency assessment	<p>The organisation seeking approval can document and specify a system to assess staff competency for approval by Biosecurity New Zealand.</p> <p>Allows the organisation flexibility in training and for determining the competence of staff.</p>
<p>Organisation to document:</p> <ul style="list-style-type: none"> ○ methods to assess personnel competency ○ How competencies shall be maintained <p>How records of competency assessment for personnel will be maintained</p>	This will allow the organisation some flexibility to match training with current systems and procedures.

2. Guideline to the Standards

The Forest Product Export Committee and Biosecurity New Zealand are looking to develop a guideline for assisting organisations to develop and document their systems for approval under the revised standards.

Note: *These guidelines would be advisory, not mandatory.*

3. Examples of using the standards

Organisations will need to select the standards applicable to the scope of their activities. Examples are illustrated for a selection of industry sectors. (Table2).

Table 2 Examples of how the system may be applied

Standard	Log Exporter	Board Manufacturer	Sawmill
System overview and requirements	✓	✓	✓
IVA requirements			
Organisation requirements	✓	✓	✓
Phytosanitary Inspection		✓	✓
Requirements for the supplier of official treatments			✓
Phytosanitary documentation (Phyto Ecert)	✓	✓	✓
Pest survey			
Registered certification mark (ISPM15)		✓	✓