Ministry for Primary Industries
Manatū Ahu Matua

Certification review project - frequently asked questions (FAQs)

Approval process

Q   What fees are payable to MPI for approval of my system?

A   If you are submitting an updated system the amendment fee ($62.50 inc. GST) applies, plus any applicable IVA costs. If your organisation is terminated and then reapplies, the new application fee will apply.

Q   How long before the deadline for approval should I submit my updated system to my IVA?

A   MPI strongly recommends you submit your updated system to your IVA at least six weeks before the start of your export season or your system audit date.

Q   Can I submit my existing MAO system to my IVA for approval by MPI?

A   The revised standards contain new requirements that require all MAOs to amend their systems. You will need to invest some time reviewing and updating your system to ensure it complies with the revised standards.

Q   What happens if I submit my system on time, but my approval is delayed during the IVA evaluation and MPI review process?

A   Decisions will be made on a case by case basis. An MAO whose system has been evaluated and recommended for approval by their IVA will be able to operate under a provisional approval while their system is undergoing review as advised by MPI.

Q   What happens if I don't submit my updated system in time?

A   Failure to update your system and submit it on time will result in automatic suspension of your MPI approval. If you anticipate a difficulty in meeting the deadline for approval, you should advise your IVA at the earliest opportunity and work with them to develop a plan to achieve compliance within a timeframe agreed with MPI. If an updated system is not received by MPI within the specified timeframe, your approval will be terminated.

Q   What happens if I don't update my system before the deadline for approval and have not contacted my IVA to inform them of the delay?

A   If you have not submitted your updated system or been in contact with your IVA to develop a plan, your MPI approval will be terminated.

Q   Who should I record in my system as the contact person for IVA liaison?

A   Please provide the name of the person in your organisation who is responsible for communicating with your IVA, not the name of your IVA contact.

Q   How should we identify the changes we make to our system?

A   Changes to an organisation's system must be highlighted or tracked to assist with efficient evaluation of the changes. Refer to section 2.2 of the Organisation Requirements.

Q   Can I retain procedures in my system that are not related to managing phytosanitary risk but are useful for other purposes and how will they be treated during an audit by MPI?

A   You can retain any procedures that are useful to you. They will be subject to MPI/ IVA audit unless clearly identified as not part of the documented system for MPI export certification requirements.

Phytosanitary inspection

Q **Which phytosanitary inspection procedures must I document in my operating system?**

A If you are conducting phytosanitary inspections you must include the following documented procedures in your system

- 3.1   Identification of lots for inspection
- 3.2.1   100% inspection
- 3.2.2   Sampling plans
- 3.2.3   Fully processed plant products
- 3.3 (1)   Inspection procedures
- 3.4 (1-3)   Decision making
- 3.5 (1-2)   Management of non-conforming product
- 3.6   Market eligibility

You may elect to include documented procedures for other sections of the Technical standard: Phytosanitary inspection if they are relevant and useful to you. They will be subject to review and audit if included.

Q **What is 100% inspection?**

A 100% inspection is when every item in an export consignment is inspected and each item is an inspection lot. Eligibility decisions can therefore be made on an item by item basis.

Q **How do I select a random 600 unit sample from a homogeneous lot of packed and palletised product?**

A A random sample must be an unbiased representation of a lot. To ensure that the sample you are taking is unbiased, draw units from various pallets across the lot in such a way that each pallet is equally likely to be sampled.

Q **My supplier's production sites are not contiguous. Can I inspect a sample from a grower line as if it were a homogeneous lot?**

A A homogeneous lot is defined as a volume of plant product subject to the same pest management regime that has been produced within a pre-determined place of production, where the defective units within the lot occur independently of each other and the fraction of defective plant product is constant throughout the lot.

MPI will allow phytosanitary inspection of samples from lots that have been sourced from the same grower who has non-contiguous places of production within the same district as long as they have been subjected to the same pest management regime. Before you submit your amended system for approval you must request a dispensation from MPI by emailing plantexports@mpi.govt.nz

Staff competency and pest identification

Q **Do I need to keep a record of the pests my phytosanitary staff are competent to identify?**

A When acceptance decisions are being made based on the identification of a pest, your system must contain a list of all the pests that your staff are competent to identify.

Q **Can I use general classifications such as "rots" and "live insects" to describe or identify pests in my system?**

A General classifications can be used to describe pests and they can also be defined as the 'level of assessed ability' for pest identification competency purposes. If you choose to use these high level classifications, be aware that when you are inspecting a sample from a homogeneous lot, you can only make a decision to accept product for export certification if

the pest is identified to the appropriate level, i.e. you must be able to confirm that it is not an actionable pest.

Q **Can competent staff from another MAO conduct pest identifications for me?**

A Competent staff from another MAO can undertake pest identifications on your behalf as long as you document in your system that this is where pests are being sent for identification and by whom.

Q **What criteria must an industry training course meet to be recognised by MPI?**

A MPI recognised industry training courses must:

- be run by a competent trainer/assessor;
- use course content and teaching materials that have been approved by MPI; and
- have a robust competency assessment that includes demonstrating the ability to consistently identify pests at the appropriate level and differentiating between pests with similar characteristics**.**

Q **Can I send my staff to another industry's MPI recognised training course?**

A Yes, but the competency will only apply to the pests that are covered in the course.

Q **Do MAOs undertaking 100% inspections need to meet the pest identification competency requirements?**

A If MAOs are inspecting every item and rejecting any item on which a pest is detected they are only detecting pests (not identifying them). They therefore do not need to implement the pest identification competency requirements.

Q **What online pest identification resources are available for packhouses?**

A There are a number of resources available including Landcare, SCION, Naturewatch.

Q **What staff competency assessment will MPI accept for pest identification?**

A MPI is willing to accept a range of documented, robust assessments. Contact your IVA to request copies of the guideline documents

Q **What records do I need to keep of inspection staff competency to identify pests?**

A Organisations must keep competency assessment records including those that demonstrate that inspectors are competent to identify pests to their level of assessed ability. This may be part of your competent staff register which captures the scope of their role, or this may be managed separately.

Q **Do former ISTA Laboratory staff recognised as competent for weed seed identification have to list each species of weed seed they are competent to identify?**

A Former ISTA Laboratory staff who are making acceptance decisions based on species level identifications will need to list each species that they are competent to identify within their system.

Q **What should I include in my staff competency assessment procedure?**

A If you are assessing staff competency internally, your staff competency assessment procedures must describe what the assessment is for, how it is carried out and who is responsible for the assessment. Examples of procedures are provided in the guidelines for competency assessment of phytosanitary inspection staff and pest identification. Contact your IVA for copies of these guidelines.

Other

Q **What must MAOs approved to manage their own documentation submit to an IVA for verification of a phytosanitary certificate request?**

A An MAO approved to manage supporting documentation still needs to send import permits to their IVA for verification and must make all supporting documentation immediately available to their IVA for checking during audits.

Q **Who does the certification mark for wood packaging standard apply to?**

A The technical standard: certification mark for wood packaging applies to any organisation that:

- applies the ISPM 15 certification mark to wood packaging; and/or
- constructs or alters wood packaging already bearing the mark e.g. makes repairs to wood pallets or crates.