



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



# Systems Approach for Nursery Certification (SANC)

Aurelio Posadas

National Plant Board

*Phytophthora ramorum*  
BMP and Soil Mitigation Workshop

San Rafael, CA

November 4, 2011



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## 2008 Farm Bill: Section 10201(d)(1)

SPECIALTY CROP CERTIFICATION AND RISK MANAGEMENT SYSTEMS.—The Secretary shall **provide funds and technical assistance to specialty crop growers**, organizations representing specialty crop growers, and **State** and local agencies working with specialty crop growers and organizations for the **development and implementation** of—

“(1) **audit-based certification systems**, such as best management practices—

“(A) to address plant pests; and

“(B) to mitigate the risk of plant pests in the movement of plants and plant products;



# **Vision: To Develop a Harmonized System Approach for Nursery Certification**

Harmonized state's interstate certification for movement of nursery stock through a systems approach.

## **Benefits**

- A. Nurserymen's systematically watching for pests
- B. Reduces the need for last minute inspections
- C. Branding opportunity
- D. International systems approach for movement of nursery stock



United States Department of Agriculture  
Animal and Plant Health Inspection Service  
**Plant Protection and Quarantine**



# National Plant Board Cooperative Agreement      FY - 2010

Goals –

Established the “NPB Audit Based Inspection Committee” (August, 2010) Now named Systems Approach for Nursery Certification - SANC

Gray Haun (Tennessee) & Ken Rauscher (Michigan) Co Chairs  
Representatives from the 4 Regional Plant Boards

**Mission-**To determine if an Audit Based Nursery Inspection System was feasible to develop and implement.



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## Strategy: Program Development

Collaborate with: State regulatory partners, industry stakeholders and non-governmental organizations

to formulate policy and procedures, establish infrastructure, and fund audit-based certification programs and pilots



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



# Initial Audit-based Certification Workgroup

- Gray Haun (TN), Chair
- Carol Holko (MD), Ruth Welliver / Walt Blosser (PA)
- Collin Wamsley (MO), Dan Kenny (OH)
- Wayne Dixon (FL), Stephen Schmidt (NC)
- Gary McAninch (OR), Mike Colvin(CA)
  
- Carl Schulze (NJ) President NPB
- Aurelio Posadas Exec. Secretary NPB
- Ken Rauscher – Program Associate



# SANC Development (Systems Approach to Nursery Certification)

- 1. Needs to be as good as what states are doing currently.
- 2. Can not cost the states more then it does currently.
- 3. Must not cost nurseries more the it does currently





United States Department of Agriculture  
Animal and Plant Health Inspection Service  
**Plant Protection and Quarantine**



# **Audit-based Certification Workgroup**

## **Audit Based Nursery Certification Workshop**

**February 23 and 24, 2011**

**USDA Center - Riverdale, MD**



## Exploratory Survey for SPROs

### Preliminary Survey of NPB Members:

- 39 NPB members responded
- Generally (87.2% yes, 12.8% no) NPB members are willing to consider alternative certification (audit based) systems for interstate shipping and receiving with caveats: must be shown to be effective, science based, cost neutral, scalable for various size businesses, must reduce risk of pest movement.



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## Results from Survey

- NPB members not entirely sure how much they would have to **revise their existing laws** to implement an audit system.
- Impediments to implementation were:
  - 1. **need for increased resources,**
  - 2. **more training, and**
  - 3. **incentives for industry to support.**

## Results from Questionnaire

- Some **variability exists relative to certification** for interstate shipping, but the majority of states inspect material one or two times per year.
- **Majority** of states felt that the **state regulatory agency should be a partner or sole provider of training to nurseries** .

## Results from Questionnaire

- Fee structures supporting certification are extremely variable from state to state, are generally low, and reflect varying levels of general fund support and funding mechanisms.
- Respondents (2 to 1) indicated that they were not knowledgeable enough to confidently discuss ABC with industry or other regulators.

## Related Farm Bill Projects

- Comparison of the efficacy of three certification schemes to mitigate the risk of spreading plant pests through trade in nursery stock; OR Dept. of Ag
- Quality assessment of the US Greenhouse Certification program; UFL
- **NPB assessment of audit-based certification in domestic commerce of nursery stock; NPB**
- Evaluation of the US Nursery Certification program; HRI/GWU
- Feasibility of audit-based certification for the US nursery and greenhouse industry; Northeast/Midwest Inst.
- Movement of plant pests on certified nursery stock in domestic trade; UMD
- Development of audit-based certification for high risk conifer nurseries; MI Dept. of Ag

# Harmonization Projects

- Development of a harmonized certification standard for fruit trees and pilot demonstration; PA Dept. of Ag.
- Development of harmonized standards for blueberry certification; UAR
- Development of harmonized standards for strawberry certification; OR Dept. of Ag.
- Development of harmonized standards for raspberry certification; UAR



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## Outreach and Education Projects

- Development of outreach and education materials for audit-based certification; UMD
- Development of a generic certification manual and training program; OR Assoc. of Nurseries





# Workshop -Audit Based Cert. Systems

- HACCP 
- GAIP 
- Virus Free Certifications (10202 Farm Bill Funding) 
- USNCP 



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## Workshop - HRI/GWU Review of USNCP

- Start up costs are high, but benefits could be great
- Suggests a system approach could prevent pests
- Report suggest USNCP could be streamlined
- USNCP is excessively costly to small nurseries
- Much of the industry does not understand the audit based nursery certification concept
- The industry is interested in improved production and certification systems
- Term “audit based” has a negative connotation



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## **Workshop – Review of USDA White Paper**

- Identified a lack of harmony and uniformity in the interstate nursery certification program
- Expressed concern about the movement of quarantine and other regulated pests
- Suggests an audit based system similar to USNCP to document responsibility of producers, incorporate risk analysis and implement CCP's and BMP's

## Workshop Conclusions

- NPB members are interested in considering alternative certification approaches with caveats.
- Industry is interested in reducing risks for shipping and receiving pests, but are concerned about resource demands.
- USDA is concerned about the movement of quarantine pests and lack of uniformity relative to current state by state certification program.



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## Recommendations from the Workshop

- ISO and strict HACCP systems are not applicable, but concepts should be incorporated into cert. systems.
- Current nursery certification systems are sound, but could be improved to be more uniform and effective:
  - Incorporation of Risk Analysis to ID CCP's and BMP's
  - Provide training for regulatory officials and nurs. Producers
  - Update the NPB Model Nursery Bill and appendix L.
  - Develop Education and Outreach materials



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## Recommendations cont’.

- Transition away from “load by load” inspections where appropriate
- Transition to an audit based systems (systems approach) and encourage the use of basic CCP’ s and BMP’ s system-wide
- Re-brand – don’ t use the term “Audit”  
“Systems Approach to Nursery Certification”



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



# A Systems Approach

## Next Steps -

- Expand the SANC Workgroup to include: HIS (Susan Ehlenbeck, Sara Scally, Phil Wilson, and Peggy McKie), USDA and Industry Representatives.
- Collaborate through the Systems Approach Program Partnership (SAPP) with USDA and Industry.
- Work to “harmonize” not “federalize the nursery inspection system.”



# SANC Workgroup

## Next Steps -

- Work through the NPB and HIS identify needs, develop outreach materials and implement the SANC systems on a voluntary basis.
- Work with industry to establish and verify both need and interest.
- Work with industry to develop pilots and training.
- Perhaps expand the SANC system where desirable to an intrastate and perhaps international certification systems.



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## SANC Workgroup

Next Steps –

- **Systems approach/Compliance Agreement Subcommittee:**
- **Mission:** The mission of this subcommittee is to develop examples and templates of compliance agreements and other systems approach components which may be utilized as models by regulatory staffs and industry personnel.



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## SANC Workgroup

Next Steps –

- **NPB Model Nursery Bill and Regulations Subcommittee:**
- **Mission:** The mission of the Model Bill/Regulations Subcommittee is to update and revise the model bill and regulation to provide a template that promotes uniform state nursery certification legislation, improves pest management and quality nursery production, and advances the value of state certification programs and the image of the nursery industry.



# Audit-based Certification Workgroup

Next Steps –

- **Outreach and Education Subcommittee**
- **Mission:** The mission of this Subcommittee is to develop materials and opportunities to express the significance of nursery certification and in particular the value of a systems approach to nursery certification.



# Audit-based Certification Workgroup

Next Steps -

- **Training Subcommittee:**
- **Mission:** The mission of this subcommittee is to develop training materials and opportunities for industry and state regulatory staffs that promote strong nursery certification programs and encourage systems or risk based approaches.
-



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## Horticultural Inspectors Society

- Harmonization of nursery certification efforts
- Financial Support –
- \$7,500 each for 2011
  - -\$5, 000 Interstate group nursery inspections &
    - NPB meeting
  - \$2,500 for President' s travel
    - Adjacent HIS meeting
    - plus President's meeting
  - 50 copies of HIS manuals & SPROS



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## Horticultural Inspectors Society

- Representative from each chapter on SANC Workgroup
- Representatives on some sub committees
- SPRO and HIS members need to study, brain storm and communicate with the industry
- [www.nationalplantboard.org](http://www.nationalplantboard.org) - Committees





United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



## 2012 SANC Work Plan

- Training for regulatory and industry personnel
- Continued SAPP collaboration
- Subcommittee work as identified above
- Develop pilot regulatory modules
- Ramp up planning and communication for possible implementation in 2013
- Develop outreach materials for producers, local associations and allied groups



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Plant Protection and Quarantine**



**Check out the Fact Sheet and ...**

**Thank You**