

## **The National Plant Board looks at the feasibility of a Systems Approach to Nursery Stock Certification**

In recent years the certification of nursery stock for intrastate, interstate and international shipping has become increasingly challenging for regulatory agencies. Increased shipping volumes, greater numbers of regulated pests, the need for continual upgrading of regulatory and industry staff, and the enhanced requirements for interstate shipping have increased pressure on state agencies with dwindling resources. Likewise significantly increased import and export volumes, managing larger numbers of significant exotic pests, and meeting trade enhancement mandates with state certification systems has placed a much greater burden on USDA, APHIS, PPQ. The US Congress recognized these increased needs and provided language and budget authority in the 2008 Farm Bill, section 10201(d)(1) for “development and implementation of –

- “(1) audit based certification systems, such as best management practices –
- (A) to address plant pest; and
- (B) to mitigate the risk of plant pest in the movement of plants and plant products;”

The NPB has entered into a cooperative agreement with USDA to look at the feasibility of audit based or a systems approach to nursery certification. Since October 2010 a workgroup of 10 NPB members, in cooperation with USDA, has been meeting to review baseline nursery production information, gather industry input, review ongoing audit based studies and identify the necessary components of a systems approach to certification.

### **Conclusions/Drivers:**

A recently conducted nursery survey and discussions with USDA, industry and NPB members have provided the workgroup with some insight into the desires and needs of stakeholders in the nursery certification process:

- Focusing diminishing resources to more effectively manage risk.
- Building on existing successful certification systems (nursery inspection, phytosanitary certification, compliance agreements, etc.).
- Using a risk based/systems approach to enhance nursery production processes to reduce risk of introduction, sustaining and spreading plant pests which might include enhance inventory and tracking systems, staff training, risk identification, and roles and responsibility identification utilizing current scientific data to support the improved effectiveness of enhanced certification programs.
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- Enhancing current nursery inspection through training materials and inspection templates, to help inspectors identify critical control points in nursery production and recommend practices to address them.
- Expanding the above to a system that allows for participating nurseries to ship interstate and into Canada without onerous shipping point inspections, similar to the current USNCP but eliminating the ineffective paperwork and maintaining the contact between nursery staff and inspectors.
- Building a proactive outreach and education program from both the regulatory agencies and nursery industries that supports the values of nursery certification and systems approaches.
- Increasing the uniformity among state certification programs, by reviewing and modifying the NPB Model Nursery Law. Harmonization efforts led by NPB, with input from USDA and the nursery industry will be more effective in regulating pests and managing quarantine programs. The JBHP which includes USDA and CFIA input may be model to build on.

### **The Way Forward:**

After considerable discussion, the workgroup developed the following conclusions and recommendations relative to audit based or risk based quality management systems:

1. ISO certification and strict HACCP systems are not appropriate or applicable in their entirety for the nursery industry. However, many of the concepts such as risk analysis, identification of CCPs and development of BMPs, audit provisions, training, documentation, roles and responsibility identification are very important to any certification system. These concepts should be incorporated into baseline and quarantine compliance certification systems where ever possible.
2. The current baseline and quarantine certification systems for nursery certification are sound, but can be improved to make them more uniform, effective, and credible by implementation of the following measures:
  - A. Incorporation of Risk Analysis to assist in identification of CCPs and development of BMPs where possible and appropriate for production nurseries and dealers.
  - B. Providing uniform training for both regulatory officials and the nursery industry. This training should include short courses in such areas as auditing, pest risk analysis, pest identification, and compliance agreements, CCP, and BMP development, etc. Opportunities exist for collaborative development of training materials between industry, the land grants, USDA, NPB, and HIS members.
  - C. Updating the NPB Model Nursery Law. The original model law was crafted to provide a framework for comparison and potential harmonization of state laws. It should now be

updated to incorporate language that would facilitate risk based, systems approaches to certification.

D. Development of Education and Outreach materials for both regulatory agencies and industry. This material would describe the components and benefits of the certification system, systems approaches, value of CCPs and BMPs, etc. in the context of improving existing effective programs, while promoting buy-in from the both regulators and industry.

3. The Quarantine Compliance Certification system provides that higher level of assurance is required to meet state and federal quarantine pest concerns. There is an opportunity to reduce pest risk and improve assurances by utilization of risk based/ systems approach techniques in a step by step fashion over time. This can be accomplished by:

A. Transitioning to risk based quality management systems utilizing such tools as compliance agreements, which include risk analyses, CCP's, BMP's, responsibility identification, and auditing for verification. Certification systems for gypsy moth, Japanese beetle, *P. ramorum*, and LBAM which already exist or are in stages of development, provide excellent opportunities for implementation of these audit based technology.

B. Transitioning away from load by load shipping point inspections. These inspections are a drain on agency resources and provide only a snap shot in time to support certification decisions. It is suggested that as much as possible, systems approach techniques such as risk analysis, CCP's, BMP's, etc., be incorporated in to these traditional inspection protocols.

4. Certification for international shipping may, for the near future, continue to utilize:

A. United States Nursery Certification Program (USNCP) with its full audit based provisions or,

B. Phytosanitary certification utilizing load by load inspections. Again, it is desirable, where possible, to incorporate audit based techniques to help reduce pest risk.

The NPB welcomes the input of all stakeholders as we review our current processes and search for new risk based approaches that better meet the needs of the industry and regulatory agencies.