



A Systems Approach to Nursery Certification





Developing and Using Your Audit Checklist:

System and Surveillance Audits

Audit Checklists

Non-Compliance Classification

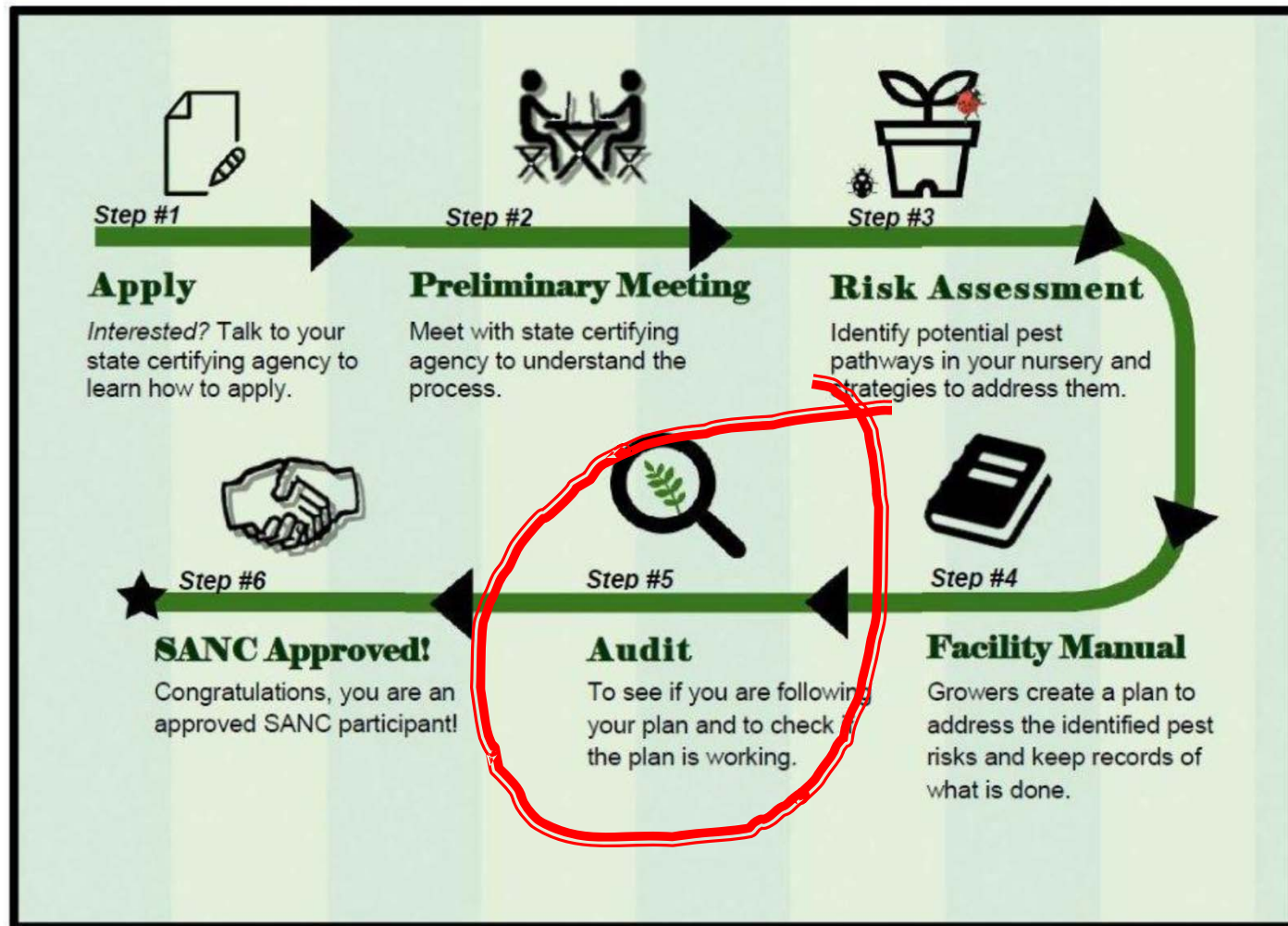
Central Region SANC Training

Indianapolis September 25-26 2018

Wayne N. Dixon, NPB – SANC

<http://sanc.nationalplantboard.org/>

Steps to Becoming SANC-Certified



SANC Training Manual Tabs

Tab O for Systems and Surveillance Audits



► **Tab P** for Audit Checklist

Tab Q for Classification
of Non-Compliance

Surveillance and Systems Audits

- ▶ Building the
 - Partnership
 - Communications
 - Trust
- ▶ between Facility Staff and State Certifying Authority
- ▶ Transparency
- ▶ Ideal: Same Audit form used in
 - Facility Internal Audits and
 - SCA External Audits



How to Do Audit: Surveillance/Annual Systems

► Identify Audit Leader



► Information

- Risk Assessment Facility Manual Audit Checklist

► Pre-Audit Communications

- Identify Facility Staff Determine Audit Date
- Meeting Space Scope of Audit (Systems, Areas)

► Conducting Audit

- Review scope Facility Staff Input
- Work through Checklist Record Results



How to Do Audit: Surveillance/Annual Systems

- ▶ Wrap-up Meeting with Facility Management
- ▶ Review Audit Findings
 - Note any Non-Compliance Findings
- ▶ Gather Input from Facility Management
- ▶ Complete Audit Checklist
- ▶ Final Audit Report



Surveillance and System Audits

- ▶ A SANC–certified Facility should have:
 - one annual systems audit and
 - at least two surveillance audits
- ▶ Frequency of audits in subsequent years can change +/– based on :
 - volume and destinations of shipments
 - history of compliance at the facility
 - other pest risk factors



Surveillance and System Audits

Systems Audit:

- ▶ A systematic examination of the entire described procedures, processes and resources in the SANC Facility Manual are being carried out and
- ▶ Continue to be sufficient to prevent the introduction and spread of regulatory pests for the facility
- ▶ Successful completion allows SANC Agreement Renewal



Surveillance and System Audits

Surveillance Audit

- ▶ Verification that the nursery stock and records conform to the SANC Standards and SANC Facility Manual
- ▶ Concentrates on a specific aspect(s) of the production facility: containers, media, propagation, shipping, records, etc.
 - Number of systems or areas can be one or several
 - Different from one surveillance to another
 - Continuance of SANC Agreement



Facility Manual ➡ Audit Checklist



Systems Approach To Nursery Certification (SANC) Facility Manual



09CP6V2

Star® Roses and Plants/Conard-Pyle | 25 Lewis Road, West Grove, PA 19380 | 610.869.2426 | www.starrosesandplants.com



Facility Manual → Audit Checklist



SANC Audit Checklist (draft 8-9-16)

Date of Audit: 8-11-16		Date of Last Audit: First	
Name(s) of Inspectors:	Tina Stimmler		
	Dana Rhodes		
Name(s) of Facility Staff Present During Audit:	John Rausch		
	Steve Ramsey		
	Alex (?)		
Facility Name:	Star Roses and Plants Conard Pyle Company		
Address:	25 Lewis Drive, Cochranville, PA		
Zip Code:			
County:	Chester		

Have there been any changes made to the facility manual since the last audit? YES / NO NA

Type of Audit Completed			
System: yes/no	External System Audit		
Surveillance: yes/no	Audit Completed for:		
Internal or External	Completed By: Dana Rhodes	Date: 8-11-16	



Facility Manual Audit Checklist

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History of Business

1. PARENT FIRM, if applicable (Name, address)		2. CORPORATE OFFICERS (Name, title, business address)	
Conard Pyle Company		Steve Huntin, President	
		Dave Watkins, CFO	
		John Rausch, COO	

3. Registration/License Status (Circle appropriate type)	4. Type of Firm (Indicate appropriate type)	5. Type of Stock (Circle all that apply)	
a. License # _0002JG	a. Greenhouse <input checked="" type="checkbox"/>	a. Trees <input checked="" type="checkbox"/>	e. Herbs
b. SANC Agreement # SANC-2016-45-001	b. Nursery	b. Shrubs <input checked="" type="checkbox"/>	f. Liners <input checked="" type="checkbox"/>
c.	c. Nursery/Greenhouse	c. Annuals	g. Fruit:
d.	d. Other: Please specify _____	d. Perennials <input checked="" type="checkbox"/>	h. Other

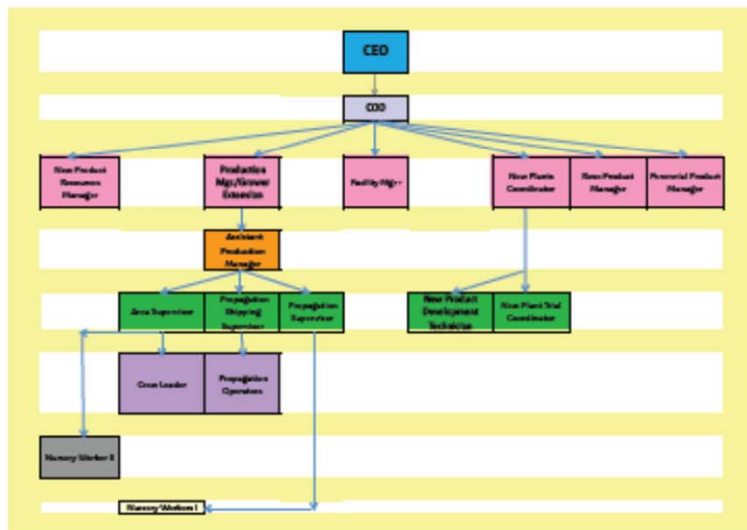
6. Size of Facility	7. Interstate Business
a. Acres: 65	a. Is Interstate business received? <u>YES</u> / NO If yes, percentage received: __ >5%
b. Square Footage Under Glass: 4	b. Is Interstate business sold? <u>YES</u> / NO If yes, percentage sold: _90%

Facility Manual ➡ Audit Checklist

Facility Manual Org Chart

Staff and Facility

Organizational Chart



Staff and Facility

Position	SANCR Responsibilities	Qualifications / Training	Continuous
SANCR Program Manager or Chief Operating Officer	Has been assigned the authority and accountability to develop and implement the SANCR management system that makes the SANCR requirements.	Attends MPA SANCR Meetings	Meets in a program authority and regular basis
	Responsible for ensuring that the SANCR requirements are carried out throughout the entire operation.	Has working knowledge about systems approaches	SANCR Participation
	Ensures SANCR compliance through the SANCR Management Plan, Internal Audit, and program record keeping of the facility.	Is an officer of the company	Auditing and review of SANCR manual and continuous improvement system
	Ensures that employees with SANCR responsibilities have the necessary experience in performing their work and are adequately trained.		
	Consistent to the SANCR policy and responsible for non-conformance and manual change.		
	Responsible for managing the SANCR and by manual.		

SANCR Program Manager or Production Manager	Has a complete understanding of the SANCR program and is the primary manager responsible for the SANCR program. Implements and oversees the SANCR Management Plan and is accountable for personnel integration. Also is alternate to the SANCR Program Manager. Responsible for conducting internal audits and reporting compliance under the SANCR program manager. Establishes and implements corrective action plans for identified non-conformances. Maintains all records pertaining to personnel management and integration. Reports occurrence of any non-regulated peers on internal plant management to same jurisdiction. Maintains all production equipment; employees in their related SANCR job description responsibilities.	Meets with area authorities on a regular basis to maintain a up to date knowledge of regulated peers. Certified pesticide applicator certification. Adheres to MPA as per required.	Attends industry sponsored courses on SANCR to maintain pesticide applicator certification. Participates in MPA SANCR Meetings. Continues education on pesticide application, SANCR updates from extension and same agencies.
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SANCR Program Manager or Production Manager	Meets with area authorities on a regular basis to maintain a up to date knowledge of regulated peers. Certified pesticide applicator certification. Adheres to MPA as per required.	Attends industry sponsored courses on SANCR to maintain pesticide applicator certification. Participates in MPA SANCR Meetings. Continues education on pesticide application, SANCR updates from extension and same agencies.
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Facility Manual Staffing



Facility Manual Audit Checklist

I. Staff and Facility

Yes	No	N/A	Check one for each item on checklist	NARRATIVE
Staff				<p>One assigned position no longer exists and a new position was recently determined. John will make necessary change to chart and in SANC responsibilities and submit manual updates with appropriate notations for changes.</p> <p>Responsibilities clearly defined.</p> <p>One new position identified, but not filled. New Products Development position is no longer active.</p> <p>Interviewed various levels of people at Conard Pyle. All were aware of SANC and new it meant clean plants.</p>
x			Is the organizational chart current?	
x			Are SANC responsibilities assigned to appropriate staff members?	
x			Are SANC responsibilities clearly defined?	
x			Have there been any staffing changes in the organization?	
x			Do staff members understand their role in SANC?	
x			Do staff members with assigned duties in SANC meet the qualification requirements?	
Facility				<p>Some changes in department locations to be indicated.</p> <p>Preventative measure taken to restrict movement of people and vehicles.</p>
x			Does the facility maintain an accurate map which identifies growing areas, water sources, shipping/receiving, etc.?	
x			Is the facility minimizing risk of pest introduction by people and/or vehicles?	
x			Are areas sufficiently maintained and clean in order to minimize pest risks?	

Facility Manual Audit Checklist

Scouting

- Scouting is performed in all growing zones on a regular basis. Scouting is done by IPM scout (this responsibility is part of the New Product Development Technician and the Assistant Production Manager). Findings are published and distributed via email. PM reviews report and walks with IPM scout to review findings. PM assigns corrective action. PM scouts treated areas to monitor efficacy. Re-treatment is assigned as necessary.
- If suspected virus is found, sample plant is sent to a reputable lab for virus panel test. Upon receipt of lab results plants are either discarded or cleared for movement into growing zones.
- Scouting reports are managed electronically by the Production Manager.
- Sticky cards are used in zone 3 and BGH to monitor pest and beneficial populations.
- Monitor pH and EC levels in container media on a regular basis.
- Beneficial insects, mites and nematodes are applied on a regular basis during the growing season to suppress Thrips, Aphids, Shore Fly, Fungus gnats and mites.
- Fungicides are applied on a regular schedule to suppress the growth of fungal pathogens in all growing zones.
- Pesticide application records are maintained by the Production Manager according to federal and state requirements.

Facility Manual Audit Checklist

II. Pest Management Plan - Scouting

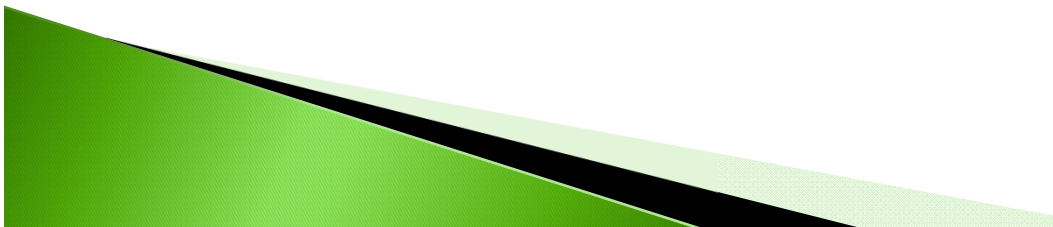
Yes	No	N/A	Check one for each item on checklist	NARRATIVE
x			Are there scouting programs in place for pests?	Production, Shipping, and Greenhouse staff are trained to report any plants which may have pests. Steve Ramsey is notified when there is a problem.
x			Are there scouting procedures for shipping/receiving, storage and production areas?	
x			Are monitoring tools visible in production areas?	There are signs posted, tailgate training information is placed throughout facility.
x			Are identification tools available to staff?	When a pest is identified Steve is notified. Steve determines appropriate course of action. If pest is not known, a sample is collected and sent to lab or to PDA for verification.
			What procedures are taken when a pest is identified?	
			Who is notified when a pest is identified?	
x			Were corrective actions are taken?	If a pest is of regulatory concern, PDA inspector or SPRO is notified.
x			Are scouts trained to identify and report regulatory pests?	Sticky cards were seen throughout the greenhouse operation. Alex is going to add dates to the sticky for better monitoring.
x			What procedures are taken when an unknown pest is found?	
x			If pests of regulatory concerns are found, what procedures are followed?	Scouting is done on regular basis by growers. Schedule is determined by zone, stock, and department to use the information.
x			Are monitoring tools such as sticky cards changed as needed?	Beneficial insects and other IPM approaches are utilized throughout.
x			How does the facility determine the scouting schedule?	
x			Are multiple approaches used for controlling pests?	Reviewed scouting records which are then connected to appropriate pesticide applications if needed.
Please describe:				

Non-Compliance Classification

NON-COMPLIANCE and CORRECTIVE MEASURES



Activities or products that are not in compliance shall be classified as a critical, major or minor non-compliance



Non-Compliance Classification



► Critical Non-Compliance

- Single finding that threatens the integrity of the program, the production facility or plant product
- A critical non-compliance would result in immediate suspension from the SANC program

► Major Non-Compliance

- Isolated incident which has no direct impact on the integrity of the SANC-certified product, provided corrective actions are completed within a specified timeframe.
- If the facility fails to carry out the required corrective actions within the specified time period, the facility must be suspended from the SANC program.

► Minor Non-Compliance

- Isolated incidents that do not immediately and/or significantly affect the integrity of the program or the plants produced, but require corrective action.



Classification of Non-Compliance

Area	Critical Non-Compliance	Major Non-Compliance	Minor Non-Compliance
Management (3.1.1)	<p>Blatant disregard for requirements related to the SANC program or any associated compliance agreements.</p> <p>Routine failure to perform internal audits or</p> <p>Provide SANC training or</p> <p>Follow pest management procedures as described in Pest Management Plan or Facility SANC Manual or</p> <p>Maintain required records</p>	<p>Timely corrective action is needed</p> <p>More than three minor non-compliance issues are detected during a single audit</p> <p>Failure to notify SCA of change in SANC Manager position</p>	<p>Corrective action is needed</p> <p>Undocumented change in organization chart, e.g., scouting position</p> <p>Alternate SANC Manager position changed</p>

Classification of Non-Compliance

Area	Critical Non-Compliance	Major Non-Compliance	Minor Non-Compliance
Pest Management Plan (3.2)	Pest Management Plan is ignored	Major revisions to Pest Management Plan are not approved by state certifying agency	Minor revisions to Pest Management Plan are not incorporated into the Facility SANC Manual

Classification of Non-Compliance

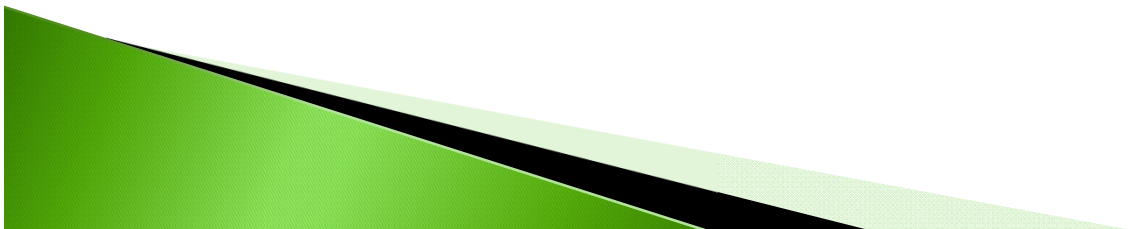
Area	Critical Non-Compliance	Major Non-Compliance	Minor Non-Compliance
Records and Documents (3.4)	Training, scouting or spray records are not available to the certifying agency	Training, scouting, or spray records are incomplete	Minor errors in training, scouting or spray records

Non-Compliance

Non-Compliance Detection and Determination of Status

If detected by the SCA, the facility will be informed in writing of the corrective actions required for compliance – prompt correction is needed

If detected by the facility, the non-compliance must be documented by the facility along with any corrective actions taken. Major non-compliance requires notification to SCA.



Non-Compliance



- ▶ Corrective Action Request form
 - Detailed description of the measures that the certified facility will implement
 - Timeframe for completing the corrective actions
- ▶ Corrective actions for major non-compliance will require timely follow up by the certifying authority
 - Failure to follow the prescribed actions may result in suspension of the facility from the SANC program
- ▶ Corrective actions to minor non-compliances usually will not require follow up by the certifying authority

Classification of Non-Compliance

Systems Approach to Nursery Certification



Corrective Action Request

Corrective Action Request (CAR) #		Date:	
Facility Name:		Address:	
Facility Location:	Facility Manager:	Auditor:	
Audit: Internal _____ External _____	Non-compliance: Critical _____ Major _____ Minor _____		
Description of non-compliance:			
Signature of Auditor: _____		Date Issued: _____	
Corrective Action:			
Facility Representative: _____		Date to Complete: _____	
Corrective Action Acceptable: ___ Yes ___ No			
Additional Comments:			
Date Action Completed:	Signature of Auditor:		

Filled out
at time of
audit

Can be
completed
on site
or
scheduled
for later



Non-Compliance

Suspension or Cancellation of Participation



- ▶ Facility that is not able to:
 - maintain the required phytosanitary conditions
 - does not implement corrective actions in a timely manner
 - has misrepresented or misused claims related to the SANC program
 - found violating any condition of the SANC program
- ▶ will be immediately notified in writing by the certifying authority of their suspension or cancellation from the program
- ▶ Suspended facilities shall not ship material using their SANC documents, labels or certificate



Thank you!



....Promoting a harmonized, risk-based systems approach to nursery and greenhouse certification

