



SANC Program Questions and Answers:

What is SANC?

The systems approach to nursery certification (SANC) is an ongoing effort to incorporate a voluntary systems approach process into existing state based certification programs to reduce pest risk and pest movement while facilitating and expediting the movement of nursery stock.

What is the goal of SANC?

To develop and implement an audit-based, voluntary nursery and greenhouse certification system based on a systems approach process and utilizing existing state authorities for intrastate and interstate shipping of plants for planting. This voluntary certification approach would assist growers in expediting shipments, minimizing the distribution of nursery and greenhouse-associated pests and enhance uniformity among inspection programs. A systems approach allows growers to work more collaboratively with regulatory officials, playing a more active role in identifying best management practices and managing pests, and freeing up regulatory resources that can be directed to areas of greater risk.

How is the SANC initiative organized?

The SANC initiative is led by the National Plant Board (NPB). Much of the development and implementation work of the initiative is accomplished through five SANC subcommittees (Education and Outreach, Training, Compliance Agreements, Model Bills, and Pilot Project) that are made up of NPB, industry and USDA members. A SANC Workgroup, made up of the core group, subcommittee chairs, industry and USDA representatives, and Horticultural Inspection Society (HIS) members provide guidance and advice to the initiative. Finally, the SANC initiative depends on the input of the Systems Approach Program Partnership (SAP-P) for guidance to assure that the SANC effort is consistent with other systems approach programs.

What is SAP-P?

The Systems Approach Program Partnership (SAP-P) is composed of industry (American Nursery & Landscape Association [ANLA] and the Society of American Florists [SAF]), and regulatory (USDA APHIS PPQ, and National Plant

Board [NPB]) representatives. The goal of SAP-P is to encourage collaboration between APHIS, the National Plant Board, and the nursery/greenhouse industry in creating a practical, consistent, science-based, systems approach to nursery and greenhouse certification program to minimize spread of plant pests and facilitate the safe movement of nursery stock in the United States.

How does SAP-P interface with SANC?

The SAP-P entity was developed to promote greater communication and collaboration among industry and state and federal certification representatives. SAP-P is not responsible for directing the SANC effort. The SANC initiative will engage SAP-P partners (both industry and USDA) to assist in building the SANC program. The SANC initiative for interstate and intrastate shipping will continue to be led by the NPB with industry and PPQ participation.

What is a systems approach?

As defined by the International Plant Protection Convention (IPPC), a systems approach is the integration of different risk management measures, at least two of which act independently, and which cumulatively achieve the appropriate level of protection against regulated pests. Risk management measures might include Isolation of incoming stock, testing the water supply for water borne diseases, scouting stock at prescribed intervals, use of new or sanitized containers, etc.

Source [ISPM No. 14, 2002; revised ICPM, 2005]

https://www.ippc.int/file_uploaded/1323945406_ISPM_14_2002_En_2011-11-29_Refor.pdf

Are there incentives that would encourage a nursery or greenhouse grower to adopt a voluntary audit- based systems process for nursery / greenhouse certification in lieu of traditional shipping point inspections?

System approaches can benefit both growers and regulatory agencies in several ways that foster support including:

1. Reduction of pest problems and pressure that translates into:
 - a. Less cull material
 - b. Fewer returned products
 - c. More confident customers, and
 - d. Less time and money spent on pesticides and pest management/control.

2. Reduction of or more targeted shipping point inspections to meet quarantine requirements that translates into:
 - a. More flexible shipping schedule

- b. Lower labor and certification costs
 - c. Greater access to potential markets for producers, and
 - d. Better and more efficient use of regulatory resources
3. Fewer quarantine violations resulting in:
 - a. Fewer enforcement penalties, and
 - b. A more satisfied customer base.
4. Greater involvement on the part of producers in monitoring and managing pest issues and eliminating pest risk.
5. Closer working relationship between producers and regulatory staff

Is SANC a new national (federal) or state nursery certification program?

No, SANC is not a new national or state nursery certification program. Instead, it is simply an alternative method of certifying plant material based upon a certification agreement developed between the facility and the state regulatory agency using a systems approach to pest management. The SANC certification would take the place of a traditional (shipping point inspection or inspection based) certification process. It is similar in approach to many existing compliance agreements that are already in use to address state and federal quarantines and authorized under existing state nursery certification programs. Under this program, the nursery/greenhouse operator will continually address appropriate pest and disease-related critical control points to provide a basis of certification of plant material.

What is a Critical Control Point?

A **critical control point** (CCP) is a point, step, or procedure in a plant production/operation system where specific procedures or practices can be implemented such that a pest hazard is effectively prevented, eliminated or reduced to acceptable levels. The NPB, USDA and industry are currently working collaboratively to develop typical examples of critical control points encountered in plant production operations that could provide guidance for the facility's development of its individual systems process.

What is a Best Management Practice?

A **best management practice** (BMP) is a method or technique found to be an effective and practical means to address a critical control point or hazard (such as preventing or minimizing a pest infestation) while making the optimum use of the resources. The NPB, USDA and industry are currently working collaboratively to develop a set of best management practices that could provide guidance to individual facilities in designing their individual systems process.

What is a Compliance Agreement?

A compliance agreement is a tool used to bring a person or firm into full compliance with the applicable requirements for producing and handling regulated material. A compliance agreement provides a written and signed agreement between the regulatory agency and the grower, processor, shipper, carriers, and/or facility confirming their understanding of the methods, conditions, and procedures necessary for compliance with plant quarantine requirements laws, and regulations. A compliance agreement may contain modules that identify stipulations to effectively address a specific state or federal quarantine or other specific certification standard of the destination state or county.

Will there be a SANC compliance agreement template?

Yes, the Compliance Agreement Subcommittee has developed a Compliance Agreement Template that may contain pest specific modules. States may use this template when developing their own agreements to ensure quarantine compliance and allow regulated articles to move into other states that have additional quarantines or regulations.

Will there be an over-arching SANC Agreement?

We anticipate that states will utilize a SANC agreement as a legally binding agreement between the plant production facility and the state certification agency identifying the specific requirements necessary for the individual facility to produce and ship nursery stock under a systems approach process. It reflects an agreement on the part of the facility to abide by all of the conditions listed in the production manual and may be accompanied by a compliance agreement with pest specific compliance modules that allow regulated articles to move into states with additional quarantines or regulations. The SANC agreement, any necessary compliance agreements, and audit approval, establish the basis for issuance of a nursery certificate under the SANC program.

Is SANC going to be mandatory?

No, this is a voluntary program that will be administered by participating states for nurseries and greenhouses that want to participate and are willing to adhere to program guidelines.

I hear there is a production manual involved in this process. What is the purpose of this manual and who develops it?

The production manual is a procedural document developed by each participating facility often in collaboration with a state auditor/inspector that describes the elements that make up the integrated measures for pest risk

management for production and distribution of plants for planting. This manual is mutually agreed upon by the facility operator and the state-certifying agency prior to entry into the SANC program.

Is there formal guidance available to industry as they consider this SANC option?

The SANC Guidance Document for Nurseries and Greenhouses, currently being developed by the SANC pilot subcommittee, provides industry with an overview of the major elements of a systems approach to nursery certification. Information in this document will allow nursery/greenhouse management to evaluate the systems approach and determine if participation in SANC is desired.

What does it mean to be SANC certified? (Specific type of plant, all nursery stock?)

SANC certification is a voluntary audit-based alternative method to traditional nursery certification programs. SANC uses system approach concepts for production of nursery or greenhouse material.

Where will SANC-certified plant material be allowed to move?

Under current plans, SANC will facilitate the interstate and intrastate movement of all nursery and greenhouse grown plant material. Some stock or families of stock may also require individual compliance agreements in addition to the SANC certificate in order to address individual state and federal quarantines in destination states and counties.

Will the SANC process require changes to state certification authority and legislation?

In some cases there may be a need to revise state certification laws based on individual state requirements. However, many state statutes are written broadly to allow administrators leeway in terms of the certification method used to approve stock for interstate and intrastate movement. Additionally, we anticipate that inspection of the product and process will be part of any external audit.

Finally, part of the emphasis of the SANC initiative involves changes to the NPB model nursery and plant pest laws to assist states as they consider needed changes.

To what requirement will nursery stock be certified?

The NPB SANC project would only address intrastate and interstate movement. The SANC-certification method is simply an alternative to the traditional shipping-point (inspection-based) state certification methods.

SANC is being designed to be compatible with international standards while recognizing that the risks are fewer and the complexity is less. We would like for SANC to be an integral part of the future international certification program so that producers and regulatory agencies could utilize a consistent set of certification standards that would allow for seamless movement. Are we there yet? No, but by reviewing and using International Standards for Phytosanitary Measures (ISPM) and Regional Standards for Phytosanitary Measures (RSPM) (North American Plant Protection Organization) we can move in a consistent direction. Having said that, the SANC project needs to be as simple as possible to allow for greater participation and efficiencies. The development of the international program is the responsibility of USDA APHIS PPQ.

Reference additional SANC information such as the SANC Framework, NPB model bills and other materials at: www.sanc.nationalplantboard.org