

## Guidelines for Classification of Non-Compliance by a SANC Program Facility

5-12-2014

Area	Critical Non-Compliance	Major Non-Compliance	Minor Non-Compliance
Management (3.1.1)	Blatant disregard for requirements related to the SANC program or any associated compliance agreements, such as routine failure to perform internal audits, provide SANC training, follow pest management procedures as described in Pest Management Plan or Facility SANC Manual, or maintain required records	More than three minor non-compliance issues are detected during a single audit.	
Staffing (3.1.1)	No one from facility assigned Pest Management Responsibilities	In a large operation, there is no one designated or trained as a back-up for Pest Management; Pest Management manager change made, but SANC certifying agency not notified	Pest Management manager change made and certifying authority notified, but update to SANC Manual not made
Training (3.1.2)	Training Plan not being implemented	A major gap in training content is identified (can't be fixed quickly, creates opportunity for pest movement or establishment)	A small gap in training content is identified; training schedule slightly modified from what is described in Facility SANC Manual
Facility (3.1.3)	Shipping plant material from undeclared production areas, while claiming SANC certification for that material	Making changes in physical facility that have potential to introduce pest hazards, without notification to state certifying agency	Changes in facility not updated in facility SANC Manual
Pest Management Plan (3.2)	Pest Management Plan is ignored	Major revisions to Pest Management Plan are not approved by certifying agency	Minor revisions to Pest Management Plan are not incorporated into the Facility SANC Manual

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Pest Management (3.2)	Finding of a quarantine pest infestation on material shipped from the facility ; Failure to notify certifying authority when a quarantine pest is detected at the facility	Failure to prevent build-up of non-quarantine plant pest populations	Failure to detect low level populations of non-quarantine pests
Internal Audits (3.3)	No internal audits done	Internal audits have failed to uncover significant pest hazards.	Internal audits have been poorly documented.
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
General	Failure to undertake corrective actions prescribed by the SANC certifying authority for a major non-compliance, in the agreed-upon timeframe, without reasonable cause	Failure to update Facility SANC Manual when there are changes in critical personnel, facilities, or processes related to SANC functions; Failure to pay fees; misrepresented or misused claims related to the SANC program	



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