State Level Model Standard:

A Systems Approach to Nursery Certification (SANC)

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Scope

This standard describes the essential elements of a harmonized state-level systems approach to nursery certification (SANC) program within the United States. It outlines the responsibilities of state certification agencies and of nursery and greenhouse facilities participating in a SANC program. The SANC program is designed to address nursery certification of plants moving intra- or interstate. The goal of this standard is to facilitate implementation of a risk-based nursery and greenhouse certification system utilizing existing state authorities and programs to enhance uniformity, increase efficiency and reduce pest distribution through the nursery supply chain.

The SANC Program is voluntary and all nursery and greenhouse operations within states and territories of the United States, in good regulatory standing, are eligible to participate.

References:

IPPC Standard, ISPM 36, “Integrated Measures for Plants for Planting” (2012)


SANC website: http://sanc.nationalplantboard.org/ (includes SANC Glossary of Terms)

1.0 GENERAL REQUIREMENTS

1.1 Legislative Authority. All authority granted through individual state statutes and state regulations, and authorities granted through federal cooperative agreements.

1.2 Eligible Plant Material. All plant material regulated under the state nursery law of the originating and/or receiving state is eligible for certification under this standard.

1.3 Regulated Pests. All federally regulated plant pests and plant pests regulated under the state’s plant pest laws and/or nursery laws are also regulated pests under the SANC program. Entities participating in the SANC program are required to obtain and comply with pest and plant import regulations for the states in which they produce and to which they ship their products.

1.4 Eligible Entities. Nursery or greenhouse facilities in all states and territories of the United States and in good regulatory standing are eligible to apply for participation in the SANC program.

1.5 Fees. Fees for participation in SANC are authorized by state statutes and regulations.
2.0 APPLICATION AND ENROLLMENT IN THE SANC PROGRAM

For a nursery or greenhouse to become enrolled in the SANC program, the following steps must be completed:

a.) The facility must submit an application to the SANC certifying authority. The SANC certifying authority reviews, approves, or denies applications to the SANC Program.

NOTE: In situations where a company has distinct separate facilities under the jurisdiction of a single certifying authority, it may apply for certification as separate facilities or as a combined facility.

b.) Upon receipt of an application, the certifying authority will schedule a preliminary meeting with the facility to review SANC requirements.

c.) The facility will conduct a risk assessment, develop a SANC Manual or equivalent documentation (referred to as the Facility SANC Manual) and submit the Facility SANC Manual to the certifying authority. The certifying authority will review the Facility SANC Manual to ensure that it contains all the required elements and that it is sufficient to meet the requirements of this standard.

d.) The certifying authority will complete an initial facility evaluation to determine whether the facility has the infrastructure and staff in place to successfully implement the system described in the Facility SANC Manual and meet the requirements of this standard.

e.) The facility and the certifying authority sign a SANC Agreement, indicating the certifying authority’s acceptance of the facility into the SANC program, as well as the participant’s understanding and acceptance of SANC standards, intention to comply with the criteria of the Facility SANC Manual and participate in SANC. The SANC Agreement will be renewed for a length of time determined by the certifying authority.

3.0 SANC Participating Facility Requirements

The SANC standard requires that: (1) all certified plant material is free from quarantine pests and has all non-quarantine plant pests under effective control; (2) licensing and certification requirements of the state of origin and the plant importation requirements of any receiving states are met; (3) plants have been grown in a management system that minimizes plant pest risk; and (4) the integrity of the SANC Program is preserved.

The SANC system components listed below are required and must be described within the Facility SANC Manual or equivalent, which shall be submitted to the certifying authority. The Facility SANC Manual will describe the requirements, processes, and systems that make up the integrated measures for pest risk management at the facility. It will document processes and
procedures used to manage the SANC system and to manage risk of plant pest introduction or spread into or within the facility.

3.1 Staff and Facility

3.1.1 Management and Organization. Participating nurseries and greenhouses must define a policy that ensures the integrity of the SANC program and allocates resources to meet the standard. A description of the organizational structure of the facility, and responsibilities of key staff related to the SANC program, must be maintained.

3.1.2 Staff Training. The facility must develop and describe a training plan for all employees involved in planning or implementing procedures listed in the Facility SANC Manual. The training goals must include a general understanding of the SANC program and the facility’s pest management system, as well as specific knowledge related to those components for which each employee has responsibility. For management staff, the training plan should include annual review of the Facility SANC Manual.

3.1.3 Facility Description. A description of the place of production and a description of areas specified in the Pest Management Plan must be maintained.

3.2 Pest Management Plan. A Pest Management Plan of the facility must be described and maintained. This plan must be based on the risk assessment conducted by the facility and must include provisions to scout for, document and manage pests within the facility. The plan will define a procedure for reporting regulated pest detections to the certifying authority.

3.3 Internal Audits and System Improvement. A process for regular internal audits (or other facility-run system improvement process) must be established, described, and implemented to verify conformance to SANC requirements; verify that systems are functioning properly; and to identify situations that may indicate needed changes to pest management. Documentation of internal audits (or alternative processes) and any follow-up corrective actions must be kept and provided to the certifying authority upon request.

3.4 Records and Documents.

3.4.1 Control of the Facility SANC Manual and Documents. The facility must describe its system to maintain and control the Facility SANC Manual or equivalent documents and records required by the SANC Program.

3.4.2 Record Requirements for the SANC Program. The SANC Program requires that records for the following be maintained for a period of two (2) years.

a.) Plant Material Traceability Records. The facility must describe the procedures and maintain records for product traceability from sourcing vendors when received until
product is incorporated into the facility’s inventory. The facility must also describe procedures and maintain records for tracing the product from shipping to the customer. Records include certificates or invoices substantiating the origin and phytosanitary status of incoming plant material.

b.) Results of inspections and audits, both internal and external, and corrective actions taken as a result of those audits;

c.) Scouting reports including any pests found and records of pest management actions taken to prevent or manage pests;

d.) Training records for SANC-specific training and general pest management training. Training records must be maintained by the facility for each employee and shall be retained for a period of two years after the departure of the employee.

The records shall be maintained and made available to the certifying authority upon request.

4.0 SANC CERTIFYING AUTHORITY RESPONSIBILITIES

The state’s certifying authority shall designate resources and personnel to ensure the operation and integrity of the SANC program. A certifying authority may establish joint SANC program administration or operation with other regulatory authorities.

4.1 Program Administration. The certifying authority will establish and maintain that state’s SANC Program, utilizing these standards. The certifying authority will review a facility’s application for participation, initiate preliminary meetings and will actively work with facility to facilitate the application and enrollment process described in Section 2 of this standard. The certifying authority shall deny participation to any facility that cannot complete the application process or meet the certification requirements of the certifying authority.

4.2 Audits. The certifying authority will conduct regular systems and surveillance audits of all enrolled facilities and will prepare audit reports that summarize the audit findings. In addition, the certifying authority will follow up to ensure that any critical or major non-compliance identified through audit has been addressed by the facility (see Section 5).

For the first year of a facility’s SANC enrollment, one (1) systems audit and at least two (2) surveillance audits will be conducted. Frequency of audits in subsequent years shall be determined by the certifying authority, and may be decreased or increased based on volume and destinations of shipments, history of compliance at the facility, or other pest risk factors.

4.3 Determining Status of SANC Participating Facility. The certifying authority has the authority to suspend a facility from its participation in the SANC program based on non-
compliance as noted in Section 5 of this standard. The certifying authority will maintain a list of active participating facilities.

4.4 Documentation and Certificates. The certifying authority will issue to the participating facility copies of the signed SANC Agreement, as well as an official SANC statement, label, or certificate.

5.0 NON-COMPLIANCE AND CORRECTIVE MEASURES

5.1 Non-Compliance Classification. SANC system components (as outlined in Section 3 of this standard), activities, or products that are not in compliance shall be classified as a critical, major, or minor non-compliance:

a.) Critical Non-Compliance: Any single finding that reveals that the integrity of the program, the production facility or plant product is in jeopardy. A critical non-compliance would result in immediate suspension from the SANC program.

b.) Major Non-Compliance: Any isolated incident of non-compliance, 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.

c.) 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.

5.2 Non-Compliance Detection and Determination of Status. Non-compliance may be detected either by the certifying authority or the facility.

a.) If detected by the certifying authority, the facility will be informed in writing of the corrective actions required for compliance (See Section 5.3). The facility must make corrections promptly, and within a mutually agreed upon period of time.

b.) If detected by the facility, the non-compliance must be documented by the facility along with any corrective actions taken. In addition, if a critical or major non-compliance is detected by the facility, the certifying authority will require immediate notification of the non-compliance and of any corrective actions taken by the facility.

The number and type of non-compliances found determines the status of the facility and the subsequent auditing frequency. Guidelines for classification of non-compliance are available; however, the certifying authority may modify classification based on case-specific evaluation of the associated risk and on all information gathered to determine whether the integrity of the SANC program has been compromised.
5.3 Corrective Action Requests. A corrective action request form will be completed for each non-compliance identified. Each corrective action request includes a detailed description, developed by the facility, of the measures that the certified facility will implement to prevent recurrences of the non-compliance and a timeframe for completing the corrective actions. Corrective actions to minor non-compliances usually will not require follow up by the certifying authority, whereas 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.

5.4 Suspension or Cancellation of Participation. A participating 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, or is 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. Program participation may also be suspended if program fees are not paid. The suspended facility will be removed from the registry of SANC-approved facilities until the certifying authority reinstates its SANC certification. Suspended facilities shall not ship material using their SANC documents, labels or certificate.

5.5 Reinstatement of Suspended Participants. A facility that was suspended from the SANC program may be reinstated after the certifying authority has received an application for reinstatement and documentation of completed corrective actions related to the suspension. The certifying authority will verify completion of corrective actions and issue a determination regarding request for reinstatement.