



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 the state certifying authority and of nursery and greenhouse facilities participating in a SANC program. The SANC program is designed to provide certification of nursery stock and greenhouse plants moving intrastate 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 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 apply for participation.

References:

IPPC Standard, ISPM 5, “Glossary of Phytosanitary Terms” (2019)

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

NAPPO Standard, [RSPM24](#), “Integrated Pest Risk Management Measures for the Importation of Plants for Planting into NAPPO Member Countries” (2005)

USDA APHIS PPQ, “[Standards for Phytosanitary Measures: Requirements for the Certification of Nurseries under the United States Nursery Certification Program](#)” (2008)

SANC website: <http://sanc.nationalplantboard.org/> (includes [SANC Glossary of Terms](#))

1.0 GENERAL REQUIREMENTS

1.1 Authority. All authority for certification under the SANC program is granted through individual state statutes and state regulations, and authorities granted through federal cooperative agreements.

1.2 Eligible Plants. All plants 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 state and federally regulated plant pests are also regulated pests under the SANC program. Entities participating in the SANC program are required to 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 must be in good regulatory standing, to be eligible 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 facility to be approved for participation the SANC program, the facility must contact the state certifying authority, conduct a risk assessment, develop a pest management plan, develop their Facility SANC Manual, conduct internal audits, participate in external audits, and sign required SANC agreements.

a.) The facility shall submit a request for participation in SANC to the state certifying authority;

NOTE: In situations where a facility has distinct separate locations under the jurisdiction of a single certifying authority, it may apply for certification as separate facilities or as a combined facility. Facilities with multiple locations in different states should notify the state certifying authority of SANC approval in another state.

b.) Upon receipt of the request for participation, the state certifying authority shall provide the facility with preliminary information regarding the risk assessment, implementation of best management practices, and completion of the Facility SANC Manual;

c.) The facility shall complete a risk assessment. The certifying authority shall provide assistance upon request. The state certifying authority shall review and conduct an on-site evaluation of the completed risk assessment;

NOTE: The risk assessment can be conducted by the facility prior to the request for participation.

d) The facility shall develop a pest management plan, based on results of their risk assessment;

e) The facility shall develop a Facility SANC Manual which meets all requirements of the SANC Standard and includes all requirements identified in the facility's pest management plan. The facility shall submit their Facility SANC Manual to the state certifying authority for review and approval. The state certifying authority will review the Facility SANC Manual to ensure it contains all the required elements and is sufficient to meet the requirements of this standard. The Facility SANC Manual may be a self-standing document or incorporate existing and equivalent documentation already maintained by the organization;

f.) The facility shall conduct internal audits to ensure that the facility can successfully implement the system described in the Facility SANC Manual and meet the requirements of this standard;

g.) The certifying authority shall complete external audits to verify that the facility is successfully implementing the system described in the Facility SANC Manual and meeting the requirements of this standard;

h.) The facility and the state certifying authority sign a **SANC Agreement** and **SANC Logo Agreement**, indicating the state certifying authority's acceptance of the facility into the SANC program, as well as the facility's understanding and acceptance of the SANC Standard, intention to comply with the criteria of their Facility SANC Manual and participate in SANC, and the proper use the SANC logo.

3.0 SANC Participating Facility Requirements

The SANC Standard requires that: (1) all certified plants are free from quarantine plant pests and all non-quarantine plant pests are under effective control; (2) all plants meet the licensing and certification requirements of the state of origin and the plant importation requirements of receiving states; (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, which shall be submitted to the certifying authority. The Facility SANC Manual will describe the requirements, processes, and systems that make up the best management practices for pest risk management at the facility. The Facility SANC Manual shall document processes and procedures used to manage the SANC system, manage the risk of plant pest introduction or spread into or within the facility and prevent distribution of plant pests when shipping plants.

3.1 Staff and Facility

3.1.1 Management and Organization. Participating nursery and greenhouse facilities shall define a policy that ensures the integrity of the SANC program and allocates resources to meet this standard. A description of the organizational structure of the facility and responsibilities of key staff related to the SANC program shall be maintained.

3.1.2 Staff Training. The facility shall develop and describe a training plan for all employees involved in planning or implementing procedures listed in the Facility SANC Manual. The training plan shall 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 shall 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 shall be maintained.

3.2 Pest Management Plan. A pest management plan for the facility shall be described and maintained. This plan shall be based on the risk assessment conducted by the facility and shall include provisions to scout for, document, and manage pests within the facility. The plan shall 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) shall 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 shall be kept and provided to the certifying authority upon request. The facility shall notify the state certifying authority immediately when there is a major or critical nonconformance.

3.4 Records and Documents.

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

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

a.) Plant Traceability Records. The facility shall describe the traceability procedures and maintain traceability records supplied by sourcing vendors, from the time that the product is received until product is incorporated into the facility's inventory.

The facility shall also describe product traceability procedures and maintain traceability records for the product from shipping to receipt by the customer. Records may include licenses, certificates and/or invoices substantiating the origin and phytosanitary status of incoming plants.

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, records of pest management actions taken to prevent or manage pests, and other records essential to the maintenance of the pest management plan;

d.) Training records for SANC-specific training and general pest management training. Training records shall be maintained by the facility for each employee and retained for a period of two years after the employee is no longer employed by the facility.

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 shall establish and maintain their state's respective SANC Program, utilizing these standards. The certifying authority shall initiate preliminary meetings and actively work with the facility during the enrollment process described in Section 2.0 of this standard. The state certifying authority shall deny participation to any facility that cannot meet the requirements of the SANC program or the certification requirements of the certifying authority.

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

For the first year of a facility's SANC enrollment, a minimum of one (1) systems audit and two (2) surveillance audits shall be conducted. After the initial external audit, subsequent systems audits should be conducted on an annual basis. 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 Notification of Governing Board. The state certifying authority shall notify their regional representative on the SANC Governing Board when each new facility has completed all steps for enrollment in the SANC program (Section 2.0).

4.4 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-conformance(s) as noted in Section 5.0 of this standard. The certifying authority shall maintain a list of active participating facilities.

4.5 Documentation and Certificates. The state certifying authority shall enter into a Memorandum of Understanding with the National Plant Board for the use of the SANC logo.

4.6 Agreements. The certifying authority shall issue copies of the signed SANC Agreement and SANC Logo Agreement to the participating facility. The SANC Agreement will be renewed for a length of time determined by the state certifying authority.

4.7 Governing Board Review of State Certifying Authority. The certifying authority agrees to periodic reviews by the SANC Governing Board to ensure facilities approved by the certifying authority are meeting the SANC Standard and in compliance with the SANC program.

5.0 NON-CONFORMANCE AND CORRECTIVE MEASURES

5.1 Non-Conformance Classification. SANC system components (as outlined in Section 3.0 of this standard), activities, or products that are not in conformance shall be classified as a critical, major, or minor non-conformance:

a.) Critical Non-Conformance: Any single finding which reveals that the integrity of the SANC program at the facility has been compromised. A critical non-conformance would result in immediate suspension of the facility from the SANC program.

b.) Major Non-Conformance: Any single finding that, without corrective action, jeopardizes the integrity of the SANC Program at the production facility. Corrective actions must be completed within a specified timeframe and require a follow-up audit by the certifying authority. If the facility fails to carry out the required corrective action(s) within the specified time, the facility shall be suspended from the SANC program.

c.) Minor Non-Conformance: Isolated incidents that do not immediately and/or significantly compromise the integrity of the SANC program at the production facility, but require corrective action. Corrective action usually can be documented at the audit.

5.2 Non-Conformance Detection and Determination of Status. Non-conformance detected by the certifying authority or the facility:

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

b.) If detected by the facility, the non-conformance shall be documented by the facility along with any corrective actions taken. In addition, if a critical or major non-conformance is detected by the facility, the facility shall immediately notify the state certifying authority of the non-conformance and report any corrective actions taken by the facility.

The number and type of non-conformances determine the status of the facility and the subsequent auditing frequency. Guidelines for classification of non-conformance are available, however the certifying authority may modify classification based on case-specific evaluation of

the associated risk and other information to determine whether the integrity of the SANC program at the production facility, has been compromised.

5.3 Corrective Action Requests. A corrective action request form shall be completed by the facility for each non-conformance identified. Each corrective action request shall include a detailed description, of the measures that the facility will implement to prevent recurrences of the non-conformance and a timeframe for completing the corrective actions. Corrective actions for minor non-conformances usually will not require follow up by the certifying authority, whereas corrective actions for major or critical non-conformance shall 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 unable 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, shall be immediately notified in writing of their suspension or cancellation from the program by the state certifying authority. Program participation may also be suspended if program fees are not paid. The suspended facility shall be removed from the registry of SANC-approved facilities until the certifying authority reinstates its SANC certification. Suspended facilities shall notify the SANC Governing Board within five business days on how they will notify their customers regarding the suspension and the use of their SANC documents, labels or certificates.

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