GROWING BETTER WITH SANC

A Systems Approach to Nursery Certification

http://sanc.nationalplantboard.org/

NPB national plant board

A MANUAL FOR REGULATORY INSPECTION STAFF

Updated July 2019, Version 1

TABLE OF CONTENTS

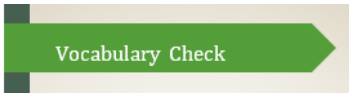
INTRODUCTION: HOW TO USE THIS MANUAL

This manual is to help inspectors navigate the process of assisting a facility in becoming SANC certified. The manual is organized in the order that an inspector will work through the SANC process:

- Chapter 1 provides the basics of SANC and essential background information.
- Chapters 2-4 cover the first few steps in the SANC certification process.
- Chapter 5 provides useful information about conducting a facility's first audit and can be used as a reference for conducting on-going audits at nurseries that have already achieved SANC certification.
- Chapter 6 highlights the final steps in the SANC certification process.

In this manual the words facility, nursery, greenhouse, participant and operation are all used interchangeably to refer to the business that is working to become SANC certified.

Several different types of graphics are used to highlight specific information. Below is a list of symbols you will see in this manual:

	Critical Decision Point – This symbol is used to indicate that the inspector, the facility or both need to determine if the facility is ready to move onto the next step in the SANC certification process.
	Keys to Consider – This symbol is used to highlight useful information that is not otherwise included in the chapter text.
	Vocabulary Check – This symbol is used to define a word as it pertains to SANC. A glossary of SANC terms can also be found on the SANC website: https://sanc.nationalplantboard.org/resourceslinks/glossary/
	Document Thumbnails - This manual frequently refers to other documents that the inspector will need to complete the SANC certification process. These documents can be found at https://sanc.nationalplantboard.org/ When viewing the manual digitally, simply click on the thumbnail to go directly to the SANC website.

CHAPTER 1: SANC PROGRAM OVERVIEW

IN THIS SECTION:

- What is SANC?
- SANC Governing Board
- Benefits of SANC
- Who is eligible to participate in SANC?
- Requirements and Responsibilities for Participating States

WHAT IS SANC?

The Systems Approach to Nursery Certification (SANC) is a voluntary certification program designed to reduce pest risks associated with the movement of nursery stock. The program incorporates a combination of systems analysis, risk assessments and audits. Nurseries and greenhouses participating in the SANC program conduct risk assessments to identify critical control points (CCP) and best management practices (BMP) to mitigate pests and prevent the movement of pests with their stock.

SANC Goal: Improve Pest Risk Management

SANC is a voluntary state-administered plant certification program

SANC is flexible enabling participation by a variety of types of production facilities

SANC certified nurseries use an audit-based system to facilitate shipping plants by reducing pest risk and distribution

SANC certified nurseries identify the critical control points that contribute to pest risk and implement best management practices to reduce their risk.

The SANC Program has established standards that must be met by the nursery or greenhouse prior to their final certification. SANC can be tailored to each operation; how one nursery or greenhouse meets a standard may differ from how another nursery or greenhouse meets the same standard. Verification that a facility has met the SANC standards is the responsibility of the state certifying authority. Participants in the SANC program will be eligible to ship plants labeled with the SANC logo.

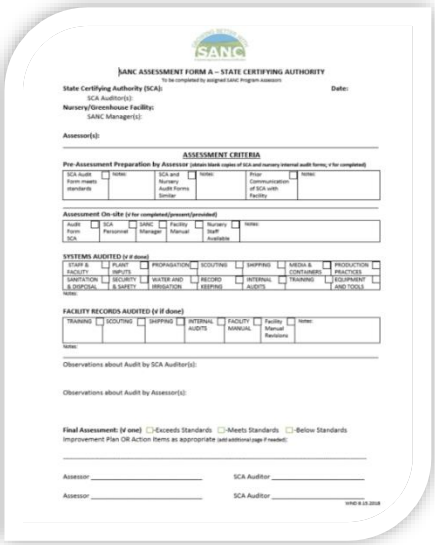
SANC GOVERNING BOARD

The SANC Governing Board is a decision-making unit comprised of a mix of USDA, National Plant Board (NPB) and industry representatives. Its purpose is to provide a mechanism for maintaining the vision and harmonization of SANC amongst states. Inspectors should use their normal chain-of-communication to their State Plant Regulatory Official (SPRO) if they believe an issue with the SANC program needs to be addressed by the governing board.

Governing Board responsibilities:

- Provide program oversight, evaluation and policy development
- Ensure that the SANC program is implemented and measured equally for states and industry
- Identify future issues and trends as they apply to systems approaches for plants for planting
- Provide a forum for resolving issues between states and/or industry
- Provide states and industry guidance on participation and training to ensure program quality

SANC PROGRAM ASSESSMENT



SANC ASSESSMENT FORM A – STATE CERTIFYING AUTHORITY

State Certifying Authority (SCA): Date:

SCA Auditor(s):

Nursery/Greenhouse Facility:

SANC Manager(s):

Assessor(s):

ASSESSMENT CRITERIA

Pre-Assessment Preparation by Assessor (obtain blank copies of SCA and nursery internal audit forms, √ for completed)

SCA Audit Form meets standards	Notes:	SCA and Nursery Audit Forms Similar	Notes:	Prior Communication of SCA with Facility	Notes:
☐		☐		☐	

Assessment On-site (√ for completed/present/provided)

Audit Form SCA	SCA Personnel	SANC Manager	Facility Manual	Nursery Staff Available	Notes:
☐	☐	☐	☐	☐	

SYSTEMS AUDITED (√ if done)

STAFF & FACILITY SANITATION & DISPOSAL	PLANT INPUTS SECURITY & SAFETY	PROPAGATION WATER AND IRRIGATION	SCOUTING RECORD KEEPING	SHIPPING INTERNAL AUDITS	MEDIA & CONTAINERS TRAINING	PRODUCTION PRACTICES EQUIPMENT AND TOOLS
☐	☐	☐	☐	☐	☐	☐

Notes:

FACILITY RECORDS AUDITED (√ if done)

TRAINING	SCOUTING	SHIPPING	INTERNAL AUDITS	FACILITY MANUAL	Facility Manual Revisions	Notes:
☐	☐	☐	☐	☐	☐	

Notes:

Observations about Audit by SCA Auditor(s):

Observations about Audit by Assessor(s):

Final Assessment: (√ one) ☐-Exceeds Standards ☐-Meets Standards ☐-Below Standards

Improvement Plan OR Action Items as appropriate (add additional page if needed):

Assessor _____ SCA Auditor _____

Assessor _____ SCA Auditor _____

SANC Program Assessment Form

The SANC Governing Board is responsible for creating an assessment program to ensure that the SANC Standard is being applied consistently from state to state. The assessment program will use individuals that are highly trained in the SANC program to conduct regular audits of state SANC programs. The SANC Program Assessment Form has been developed to guide program assessors in their review of a state program but can also be used by the state certifying authority to prepare for an assessment or to conduct periodic self-evaluations.

BENEFITS OF SANC

A successful SANC program provides many benefits to the participating facility beyond plant pest risk management.

Continuity of Operations

- ✓ Supports higher pest cleanliness standards that promote market stability and niche market development.
- ✓ Flexible approach, supporting a range of plant production systems.
- ✓ Formalizes employee's roles and establishes employee buy-in of goals and standards.
- ✓ Provides compliance for shipping plants out-of-state.
- ✓ May result in improved customer satisfaction.

Increased Quality Control

- ✓ Grow healthier plants by effectively identifying and managing pest risk.
- ✓ Increased consistency of plant quality.
- ✓ Standardization of procedures.
- ✓ SANC certified nurseries prefer purchasing from other SANC-certified facilities.

Potential Savings

- ✓ Potentially reduce pest control costs due to improved pest management.
- ✓ May result in reduced shipping inspection and certification costs.
- ✓ May confer a marketing edge.

Request SANC Outreach Materials

Additional information and SANC outreach materials can be found at the SANC website.

WHO IS ELIGIBLE TO PARTICIPATE IN SANC?

All nurseries, greenhouses or other plant production facilities in good regulatory standing are eligible to apply for participation in SANC. Once accepted into the SANC program by their state certifying authority, participants must satisfactorily complete all steps in the SANC certification process before being approved to ship plants using the SANC logo.

All plant material regulated under the state nursery law of the originating and/or receiving state is eligible for certification. All federally and/or state regulated plant pests are also regulated pests under the SANC program. Participants 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 product. SANC certification requires participants to document procedures, processes and systems that reduce risks associated with plant pest introduction or spread within a facility.

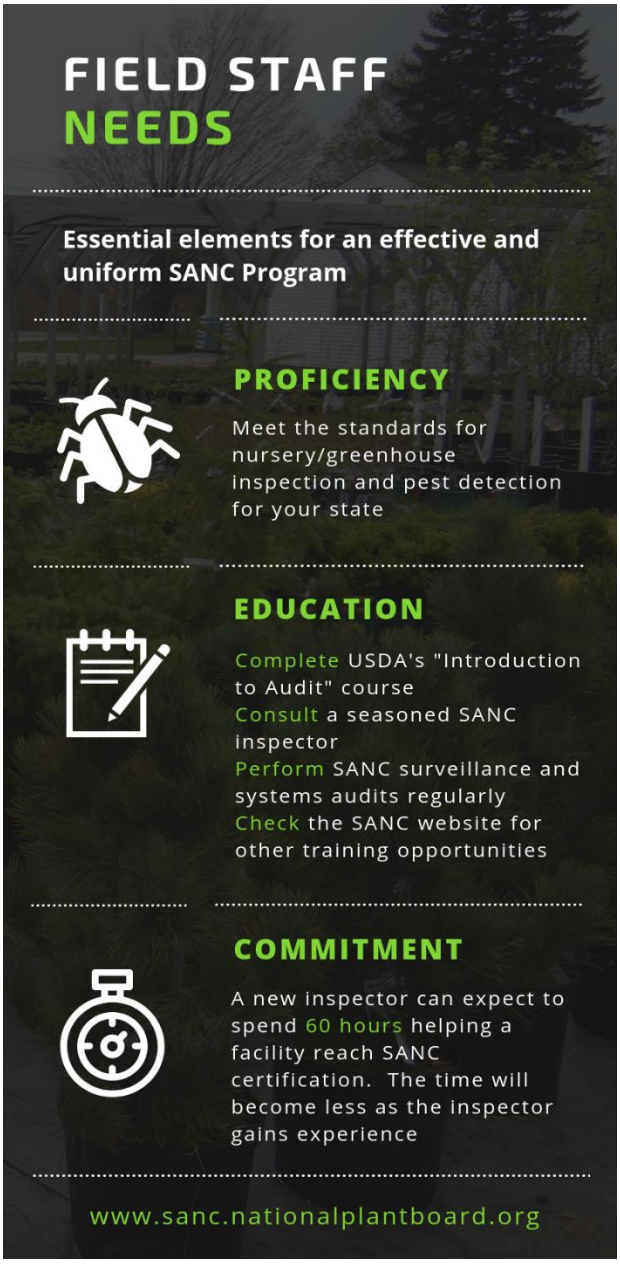
REQUIREMENTS AND RESPONSIBILITIES FOR PARTICIPATING STATES

The state certifying agency must provide resources and personnel to ensure the operation and integrity of the SANC program. Each state should determine if they have the statutory authority to provide certification using a systems approach. As part of the SANC effort the National Plant Board authored a model nursery law that incorporates language to include systems approaches to meet certification standards. In addition, to participate in SANC the state must have completed a Memorandum of Understanding (MOU) with the SANC Governing Board.

It is essential that administration or management staff have a clear understanding of the purposes, requirements and general processes of SANC. SANC brings a different methodology to inspection of nurseries and greenhouses with a shift from shipment-to-shipment inspections, to an audit-based inspection of the operations of the plant production facility. This can be beneficial when inspection staff resources are limited.

In the SANC program the inspector remains the key state worker coordinating efforts with a participating facility but, there is an essential role played by the State Plant Regulatory Official (SPRO) or their delegate. The SPRO approves the application for entry into the SANC program and the initial external audit providing SANC certification of the facility. Subsequently, the facility is regularly audited through surveillance and systems audits conducted by the inspectors. The SPRO is encouraged to be closely involved in the SANC process, especially with the first few participating facilities to gain a solid understanding of the program.

FIELD STAFF ESSENTIALS



The SANC program is a paradigm shift for the inspector. Instead of many trips to a nursery to conduct shipment-by-shipment inspections, the inspector conducts periodic reviews of the SANC-approved growing practices of a facility.

The SANC program requires an initial risk assessment, followed by the development of a pest management plan and an encompassing SANC facility manual. Through the facility manual, a SANC participant identifies how it will grow plants to best minimize pest problems. The inspector is tasked with verifying that the participant is following the agreed upon practices and procedures by conducting surveillance and systems audits.

It is important to note that the inspector is involved with the nursery or greenhouse in an informed manner. Through assisting the facility with their risk assessment and pest management plan and reviewing the SANC Facility Manual, the inspector gains a clearer understanding of the facility's growing practices.

Inspectors are required to participate in training for the SANC program. More information about SANC training is available on the SANC website.

Keys to Consider

Training: Hands-on training opportunities are useful for inspection staff and result in a significant increase in capacity to understand and implement SANC. Particularly important is audit training due to the emphasis on surveillance and systems audits – key elements in SANC!

Communication: Communication between all parties – SPRO, inspectors, and facility personnel – should be regular, thorough and candid. Typically, there are a lot of questions in the beginning stages of working through the SANC requirements.

Critical Decision Point:
Is the state ready?

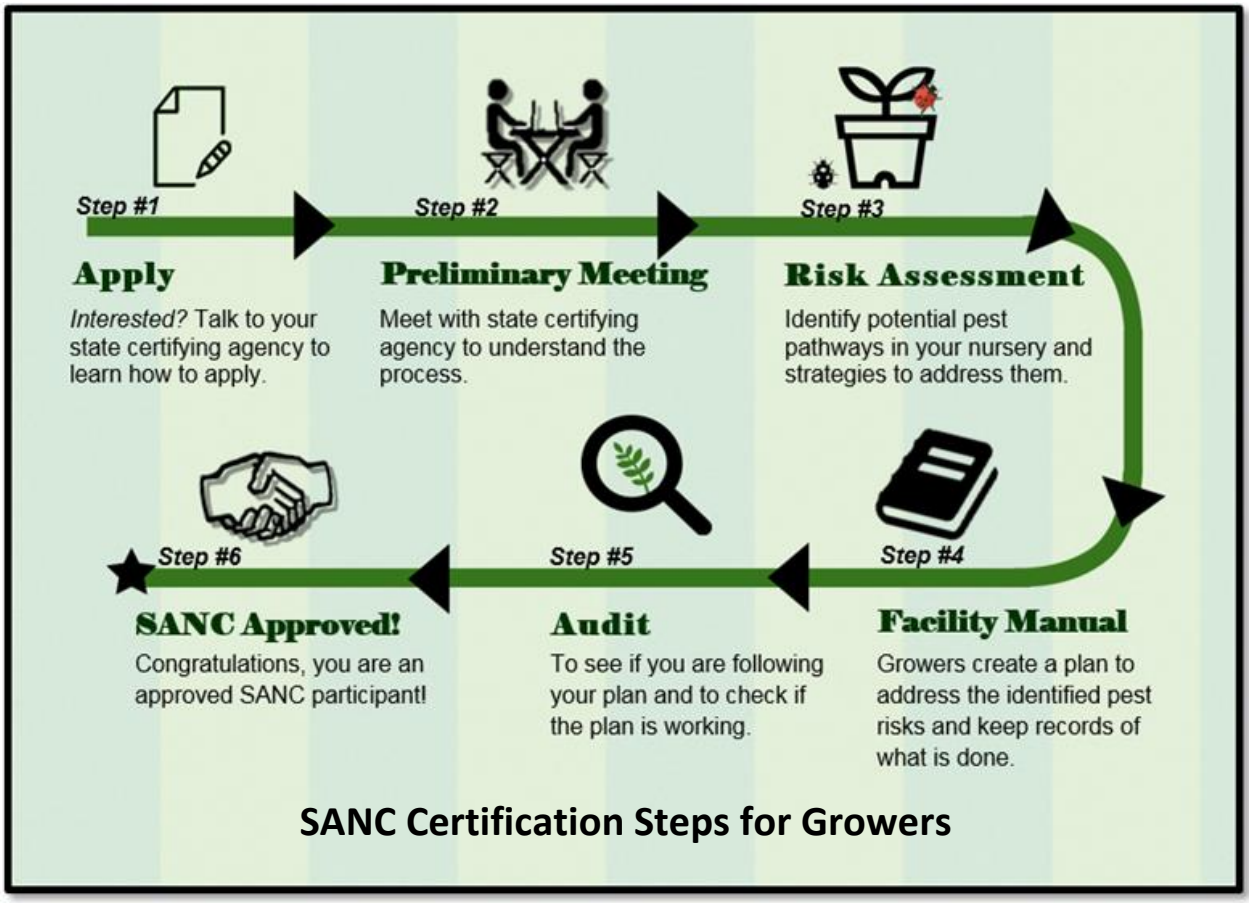
CHAPTER 2: GETTING STARTED WITH SANC

IN THIS SECTION

- SANC Step by Step
- Application for Participation
- The Preliminary Meeting

SANC STEP BY STEP

Recognizing each production facility is unique, SANC can be tailored to different types of nurseries or greenhouses. The graphic below outlines the steps that a facility follows to become SANC certified. The inspector's role at each step is detailed in this manual. The online risk assessment tool provides a mechanism for applying to participate in SANC. In some cases, a facility may choose to complete the online risk assessment tool before the preliminary meeting with the state.



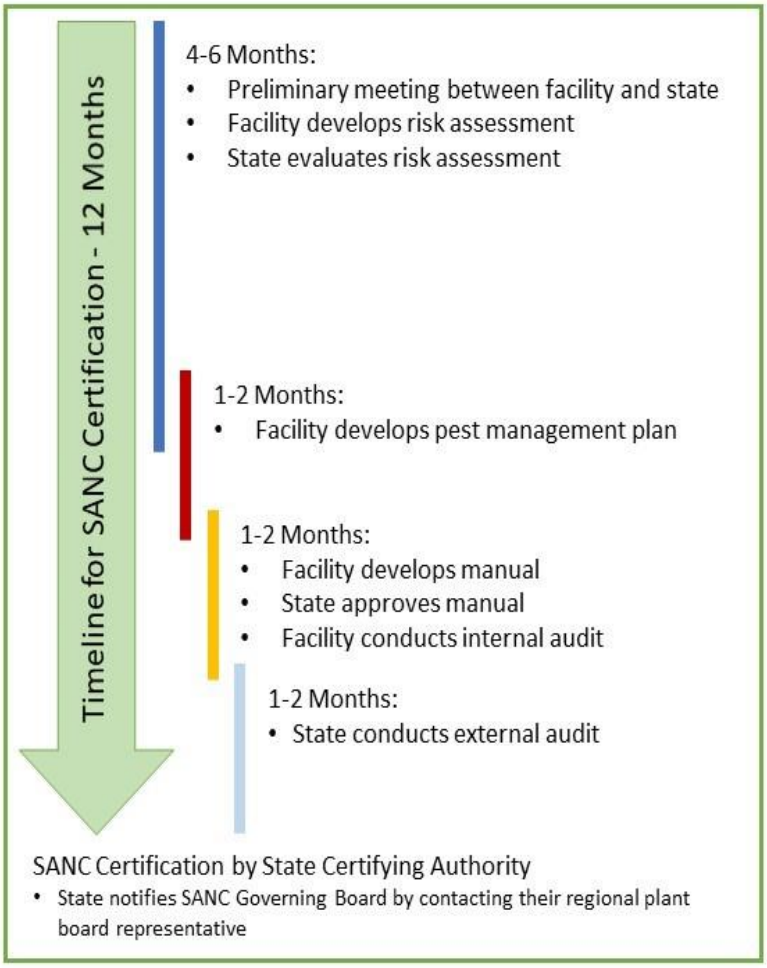
SANC Certification Steps for Growers

APPLICATION FOR PARTICIPATION

Growers that are interested in participating in the program should first contact their state certifying agency to discuss their potential participation and the state's preferred application process. The facility would be expected to meet the SANC Program Standards and will need to be in good standing with other applicable laws and regulations. The SANC Program is intended for various sizes and types of operations.

THE PRELIMINARY MEETING

The preliminary meeting should introduce and support the concepts of systems approach and facilitate open lines of communication between the regulatory agency and the facility staff. The purpose of the meeting is to provide growers with an overview of SANC and its requirements.



Topics to be discussed include:

- Expectations and steps in the SANC certification process
- Roles of state certifying agency and grower personnel
- Resource requirements
- Grower's questions and concerns
- Timelines; a goal should be to complete the SANC process within one year

PREPARING FOR THE PRELIMINARY MEETING

Prior to conducting the preliminary meeting, it is important to:

- Research the facility to determine how much time is needed for the meeting. Gather information such as: previous inspection reports, interstate shipping history, volume, geographic areas and any other info that will inform your perspective regarding this firm prior to the meeting.
- Prepare copies of introductory information about the SANC program and the website to give to the facility.
- Encourage the facility manager to include key staff in the initial meeting.

CONDUCTING THE PRELIIMINARY MEETING

The length, depth and scope of this meeting depends on the size and type of facility and whether they have prior experience or knowledge of systems approaches to production. Other programs like the US-Canada Greenhouse-Grown Plant Certification Program (GCP), United States Nursery Certification Program (USNCP), and other state and regional compliance agreement-based programs employ similar concepts that may be a good starting point of reference for the production facility. In some cases, manuals that have been developed for other USDA certification programs can meet the SANC standard. The inspector should provide copies of The Introduction to SANC and the CCP Checklist/BMP Companion.

Keys to Consider

Time: Based on the time available, determine how much information can be covered, allowing plenty of time for questions.

Participation: To successfully complete SANC certification a facility must have by-in from employees at all levels. Encourage all relevant facility personnel to participate in the conversation.

Review: Use SANC documents to highlight the essential components of SANC and answer any questions or concerns of facility staff.

Discuss: Have a conversation about the facility's operational procedures and identify examples of critical control points and best management practices they may already be using.

Identify: Take note of what additional information the facility needs to help them decide if they want to participate in SANC.

Timeline: The facility's ready to participate? Determine if an optional risk assessment walkthrough is needed and a timeframe for conducting the risk assessment.

SANC CCP CHECKLIST AND BMP COMPANION

The SANC CCP Checklist is designed to be used as a guide for inspectors and growers to identify critical control points (CCPs) to assess risk in a nursery or greenhouse production system. In combination with the BMP Companion, it will lead to the documentation or development of practical means to reduce pest risk while making optimum use of resources.

The CCP Checklist and BMP Companion was developed jointly by industry, university researchers and regulatory representatives to offer basic, best management practices (BMPs) that can be utilized to address identified CCPs in a nursery or greenhouse system to reduce pest risk. It is not a complete list of all possible BMPs but provides a scalable foundation for a systems approach to nursery and greenhouse production that can be implemented, documented, verified, and tailored to specific nursery situations.

NURSERY/GREENHOUSE INSPECTION – SANC CCP CHECKLIST

☑ =Yes, ☒ = Needs further attention, see companion document, *SANC CCP/BMP Checklist Companion*, for detailed considerations.

Plants:
- ☐ Is there a system to inspect or isolate incoming plant material?
- ☐ Are plant sources reliable/licensed?
- ☐ Are stock plants isolated from production areas?

Media:
- ☐ Is media managed in a sanitary manner?

Containers:
- ☐ Are containers managed in a sanitary manner?

Site:
- ☐ Is pest pressure from surrounding area addressed (soil, air, weeds, structures, pet plants)?

Shipping:
- ☐ Are shipping and receiving areas separate?
- ☐ Are plants inspected prior to shipment?

Water:
- ☐ Is water managed to minimize the spread of pests/pathogens?
- ☐ Is the water source safe?
- ☐ Are there drainage or humidity issues?

Production Practices:
- ☐ Are blocks of plants separated by breaks?
- ☐ Does the facility layout minimize potential for pest movement?
- ☐ Are equipment and tools properly cleaned? (Trucks, potting equipment, irrigation, knives, pruners, etc.)
- ☐ Are plants that are not in active production removed from the facility in a timely way?

Scouting/Pest Management:
- ☐ Is there regular scouting for pests?
- ☐ Is there follow-through when pests are detected?

Training:
- ☐ Is there a pest management training program for staff (pest ID, sanitation)?

Recordkeeping:
- ☐ Are records kept for plant inventory and pest management (scouting, treatments, disposal)?

Sanitation/Disposal:
- ☐ Are growing areas and work areas clear of plant debris or other contaminants?
- ☐ Are cull piles managed?

Facility Security:
- ☐ Is the facility minimizing risk of pest introduction by people?

Facility Name: _____ Inspector Name & Date: _____

Rev. 12/20/2013

SANC CCP Checklist and BMP Companion

PRELIMINARY MEETING FOLLOWUP

After the preliminary meeting:

- Develop a summary of the initial meeting and list any action items.
- Send the facility management any additional information requested during the meeting.
- Check in with the facility to see if they need additional information about program participation.

Critical Decision Point:
Are you in?

Preliminary Meeting Conducted → Facility wants to be part of SANC → State agrees facility is ready → Proceed with Risk Assessment

CHAPTER 3: RISK ASSESSMENT

IN THIS SECTION

- Risk Assessment Basics
- Optional Risk Assessment Walk Through
- Conducting a Risk Assessment
- Online Risk Assessment Tool

RISK ASSESSMENT BASICS

Vocabulary Check

Hazards: Any area of the nursery/greenhouse operations that have the potential to cause harm to the plant products by contamination or introduction of plant pests.

Critical Control Point (CCPs): Any point, step or procedure at which controls can be applied and the hazard prevented, eliminated or reduced to an acceptable level.

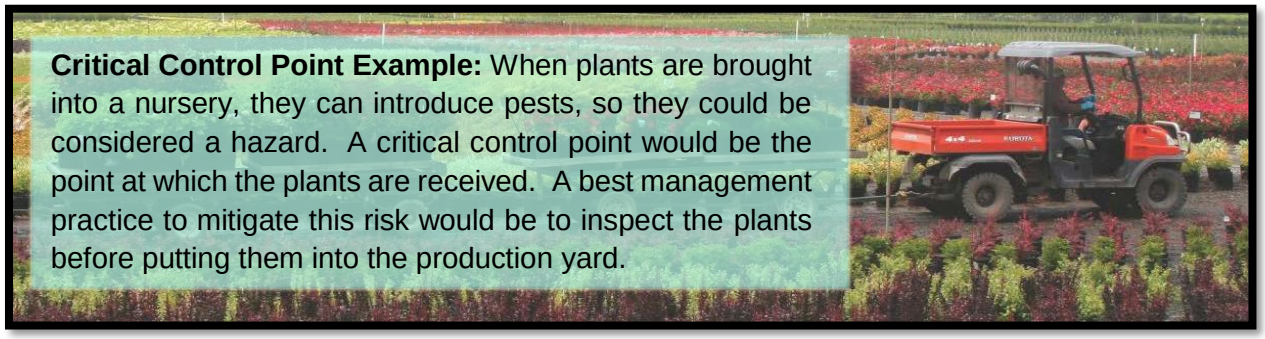
Best Management Practice (BMPs): Measures which are implemented at a CCP to prevent, eliminate or reduce the risk associated with the specific hazard.

Risk assessment is a process of identifying risks or hazards, critical control points and best management practices to mitigate introduction and movement of pests at a facility. Conducting a risk assessment to identify ***hazards*** is a vital component of a systems approach. This process will identify the nursery's ***critical control points*** (CCP) where ***best management practices*** (BMP) can be implemented to mitigate hazards. It is recommended that the risk assessment be conducted jointly with the grower and the state certifying agency. To help prepare for the risk assessment, review the SANC CCP Checklist and BMP Companion.

OPTIONAL RISK ASSESSMENT WALK THROUGH

In most cases the facility and inspector benefit from a joint pre-risk assessment walk-through of the growing facilities. Having multiple perspectives can be helpful and is likely to result in better communication as you work through issues during the certification process. The walk-through can also be a training opportunity for the state inspection staff, however, it should be left up to the facility manager to approve the number of attendees. The walk-through will help identify many of the CCPs of the risk assessment. As you are touring the facility take note of specific practices, potential risks and historical pest occurrences.

Familiarizing yourself with the nursery's pest history, compliance agreements and any other phytosanitary certifications that are in place, is very beneficial. Allowing the facility to describe their practices in detail can solidify your understanding of their operation and the personnel involved. After the walk-through, it may be helpful to begin to look at the Risk Assessment Tool and discuss the hazards and CCPs that were identified.



Critical Control Point Example: When plants are brought into a nursery, they can introduce pests, so they could be considered a hazard. A critical control point would be the point at which the plants are received. A best management practice to mitigate this risk would be to inspect the plants before putting them into the production yard.

CONDUCTING A RISK ASSESSMENT

Conducting the risk assessment for SANC certification is one of the most important and challenging steps for the production facility to complete. It is the responsibility of the facility to complete the risk assessment. The inspector's role is to guide and assist the facility through the process and provide input based on their knowledge of pest pressures, regulatory requirements, and SANC Program Standards. Ultimately, it is up to the state certifying authority to determine if the nursery has adequately addressed all the risks identified at the facility. The risk is considered adequately addressed if the facility documents at least two independent best management practices to mitigate the risk from each critical control point.

Keys to Consider

Plants: Where does the facility hold plants? Do they propagate their own plants?

Shipping: What are the procedures for deliveries and customer pick up?

Locations: Does the facility have multiple locations/farms? Are plants managed the same way at each location?

History: What crops have had pest problems in the past? What were the pests?

Compliance: Does the facility ship plants outside a regulated area or outside the US? What compliance agreements are already in place?

The risk assessment identifies areas and nursery practices where risk of pest introduction or spread may occur. The common elements of the risk assessment for nursery and greenhouse operations include the following:

1. **Inputs - Plants:** Plant pests can be introduced into a nursery/greenhouse operation through inputs such as seeds, tissue culture, bare-root and container stock, etc. Preventing the introduction of infected plant material is the first line of defense for the nursery/greenhouse operation. Proper management of these inputs minimizes risk and can prevent pest introductions.

2. **Plants - Propagation:** Plant propagation practices can result in the spread of plant pests quickly throughout new nursery stock. Inputs such as cuttings, media, containers and the tools used during plant propagation can be carriers for pathogens. Management of the propagation process can mitigate the risks associated with plant propagation.

3. **Media and Containers:** Used containers can be a source of plant pathogens and steps should be taken to prevent these containers from spreading disease to uninfected stock. Potting media should be handled and stored in a manner that will prevent media from becoming infected with plant pathogens.

4. **Site:** Weeds, debris, and native soil can harbor pests and should be excluded from production areas. Layout of the site should be designed to improve water drainage and prevent contamination of production areas.

5. **Shipping:** Trucks, pallets and loading areas can be contaminated with plant pests. Good sanitation practices, inspection of trucks, pallets, crates and disinfection of vehicles and loading areas can prevent the movement of plant pests.

6. **Water:** Proper water management can prevent the spread of plant pathogens and resulting diseases. Irrigation water should be free of pathogens in order to reduce the risk of spread of plant diseases associated with various water sources. Water which is from an irrigation pond may contain pathogens as runoff from production areas is likely to drain into the pond thus spreading pathogens from infected plants. Well water or water from a municipal system will likely have a lower risk of containing pathogens than irrigation water. In addition, the type of irrigation system used by the nursery and timing of irrigation play an important role in the spread of disease as overhead irrigation increases the chance of splash, ponding, leaf wetness, etc. Site maintenance of the nursery is important in preventing ponding and eliminating areas with poor drainage.

7. **Production Practices (Greenhouse, Container, Field):** Routine practices and procedures employed by nursery and greenhouse operations can inadvertently spread plant pests.

Establishing procedures which incorporate applicable best management practices can reduce the introduction and/or spread of plant pests.

8. **Production Practices - Equipment:** Plant pathogens can be inadvertently transmitted throughout an entire nursery/greenhouse operation through exposure to contaminated plant benches/tables, equipment and tools. Implementation of proper and routine sanitization practices can prevent the spread of pathogens.

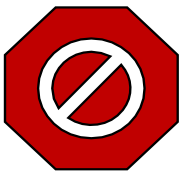
9. **Sanitation Disposal:** Plants or plant debris from infected nursery stock is a source of plant pathogens and should be removed in order to eliminate exposure to healthy stock. Cull piles and debris should be placed in isolated areas to prevent contamination from water runoff or workers.

ONLINE RISK ASSESSMENT TOOL

The SANC Risk Assessment Tool is an online program designed to assist growers in the identification of hazards associated with the production of nursery stock and associated best management practices. Growers can use the Risk Assessment Tool to list the production practices specific to their nursery and develop a plan for the mitigation of the identified hazards.

Development of the SANC Risk Assessment Tool was a cooperative effort of AmericanHort and the National Plant Board (state departments of agriculture), with funding provided by USDA. The SANC Risk Assessment Tool is available to members of AmericanHort as well as non-members. Please note that the information entered in the SANC Risk Assessment Tool by each grower is confidential and is not accessible to AmericanHort, state departments of agriculture, or USDA personnel.

Critical Decision Point:
Are risks addressed?



Risks are not adequately addressed.
Identify additional BMPs.

Risk assessment complete and accepted.
Proceed to manual approval.

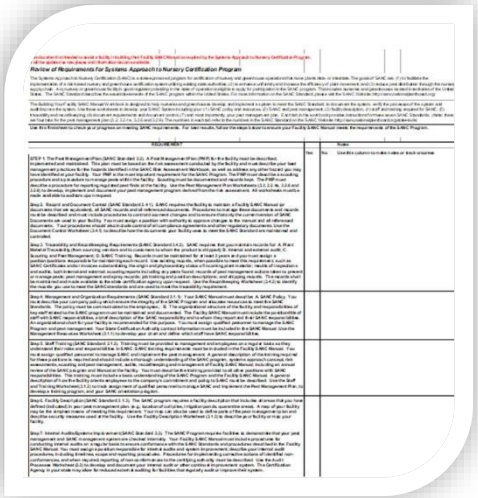
CHAPTER 4: FACILITY SANC MANUAL REVIEW AND APPROVAL

IN THIS SECTION

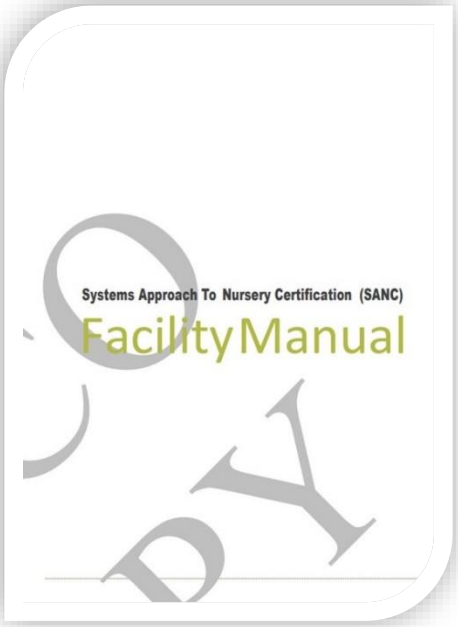
- Facility SANC Manual
- Manual Approval Process
- Updates to the Manual

FACILITY SANC MANUAL

The Facility SANC Manual is created by the grower using the results of the risk assessment along with other information about the facility. The manual becomes the guide book for the facility's SANC program and must meet the SANC Standard. It also incorporates regulatory requirements that may come from compliance agreements for specific pests. The initial Facility SANC Manual and any subsequent changes to the manual must be approved by the state certifying authority.



Building Your Facility SANC Manual Workbook



Example SANC Facility Manual

The manual is divided into four main sections describing the processes a facility utilizes to manage the risk of plant pest introduction and movement:

- ✓ Staffing and Facility Plan
- ✓ Pest Management Plan
- ✓ Audits and System Improvements
- ✓ Records and Documents

Facilities can find details on what to include in all sections of the Facility SANC Manual in the Building Your Facility SANC Manual Workbook as well as an example manual on the SANC website.

STAFFING AND FACILITY PLAN

The Staffing and Facility Plan is made up of 3 main components: Management and Organization, Staff Training and a Facility Description.

MANAGEMENT AND ORGANIZATION

SANC requires the facility designate an individual to be the lead for the SANC program. This individual will be the inspector's main point of contact and must be defined in the staffing and facility plan. In some cases, a facility may have multiple locations that may warrant a shared SANC responsibility. If so, this should be well defined in the staffing plan to ensure good communication.

Each participating facility must also define other positions that have responsibilities associated with the SANC program. These employees are required to have a basic understanding of the SANC program, including its requirements and purpose. This section of the manual should also include a description of how the facility orients all employees to the company's commitment and policies as they pertain to SANC.

The management and organization structure, as it pertains to SANC, can be presented in the Facility SANC Manual as a list of job descriptions including who reports to whom or in the form of an organizational chart.

TRAINING

Training must be provided to management and employees on a regular basis, so they understand their roles and responsibilities in SANC. Training should include all elements of both the systems approach protocol and the specific systems approach requirements established in the Facility SANC Manual.

The facility must maintain written descriptions of the management positions, training and SANC orientation records for all employees. The facility is required to include a list of all positions with SANC responsibilities and a general description of the training requirements for these positions in the Facility SANC Manual.

FACILITY DESCRIPTION

SANC requires that participants describe areas of the facility that are included in the pest management plan. The following elements should be addressed in the SANC manual: areas which are used for receiving plant material, shipping plant material, propagation, potting, production or greenhouse layout, cull and plant disposal, water sources and other facility areas that are critical to the pest management plan or SANC program.

A detailed, labeled map of the facility should also be included in the Facility SANC Manual. The map should indicate the flow of plant material through the facility and indicate any areas critical to the pest management plan.

PEST MANAGEMENT PLAN

The pest management plan (PMP) is the most critical piece of the Facility SANC Manual. The PMP is designed specifically for each facility to prevent the introduction, establishment and shipment of regulated pests and pathogens and to mitigate the spread of all other pests and pathogens that may be found at the facility. The details included in the PMP will later guide the development of the inspector's audit checklist. Prior to creating the PMP, facility staff must complete the risk assessment. The risk assessment is the guide for assembling the PMP. The PMP must address the critical control points which were identified in the risk assessment.

In addition, the PMP will include procedures for scouting incoming stock, all production areas, scouting stock prior to shipment and include a description of the record keeping system for all scouting activities. If a regulated pest is detected during scouting or other activities at the facility the PMP will describe procedures for reporting regulated pest finds to the certifying authority.

COMPLIANCE AGREEMENTS

Vocabulary Check

Compliance Agreement: A written and signed contract between the state certifying agency and the grower, processor, shipper, carrier, and/or facility confirming the methods, conditions and procedures that will be followed to meet plant quarantines, laws and regulations.

A compliance agreement may contain general requirements for producing and handling regulated material as well as identify stipulations or measures to effectively address a specific state and/or federal quarantine or other specific certification standard of the destination.

Compliance agreements are contracts between the state certifying authority and the facility that address the specific regulatory requirements for certain plant material that is destined to an area protected by a state or federal quarantine for a specific pest. SANC certified facilities are required to meet all quarantine stipulations such as pre-shipment treatments, growing season inspections, lab testing, phytosanitary certification and special labeling. These stipulations must be addressed in the pest management plan and may also be outlined in a compliance agreement. Compliance agreements may spell out record keeping or other requirements that are different than those required by SANC. In those cases, the facility must follow the condition outlined in the compliance agreement. **Participation in SANC does not reduce or change the regulatory requirements that are contained in a compliance**

agreement. You can find sample compliance agreements and a compliance agreement standard operating procedure on the SANC website.

INTERNAL AUDITS AND SYSTEM IMPROVEMENTS

Vocabulary Check

Internal Audit: An assessment conducted by the facility manager or designee to ensure that the operation is following the terms laid out in the Facility SANC Manual and other agreed upon documentation.

A facility's SANC manual must describe its procedures to conduct internal audits to verify conformance to SANC requirements. The manual will:

✓ Identify the person responsible for conducting internal audits.

✓ Indicate the timeline and scope in which internal audits will be conducted.

✓ Include procedures for reporting and documenting results of the internal audit.

✓ Indicate how records of implementation of any corrective actions taken will be maintained.

✓ Outline procedures for reporting any non-conformance to the certifying authority.

Documentation of internal audits must be provided to the certifying agency upon request. Regular reviews of improvement processes and records showing no or only minor corrections to the systems may result in reduced frequency of external audits by the certifying authority.

Internal audits are conducted by the facility and should not be confused with external audits that are conducted by the state certifying authority. External audits are discussed in more detail in Chapter 5 of this manual.

RECORDS AND DOCUMENT CONTROL

Vocabulary Check

Document Control: A written plan included in the Facility Manual for how required documentation will be stored, updated and maintained.

The SANC participant must maintain documentation of all procedures implemented to ensure that plants meet the requirements of the SANC Standard.

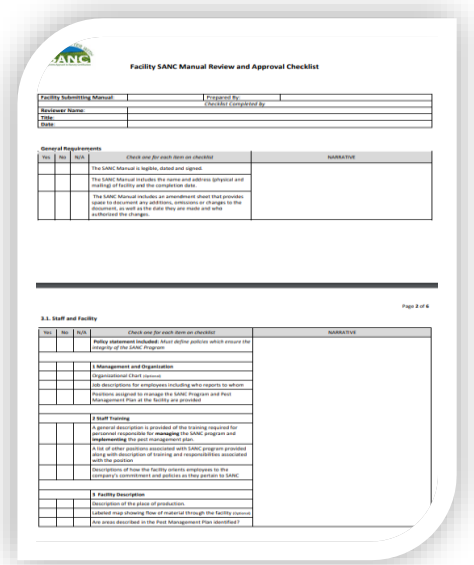
Documentation of records is important in all certification systems and serves two functions:

- To show the facility is doing what they say they are and
- To ensure that processes and procedures are consistent, utilized and improved.

The recordkeeping system must include a process to ensure sourced material is managed and that records are maintained. Records include: certificates or invoices substantiating the origin

and phytosanitary status of incoming plant material, results of inspections and internal and external audits, scouting reports including any pests found, records of pest management actions taken to prevent or manage pests, SANC and general pest management training records, and records necessary to maintain traceability of plant material.

MANUAL APPROVAL PROCESS


Facility SANC Manual Review and Approval Checklist

SANC Manual Checklist

The state will review the Facility SANC Manual for adherence to the SANC Program Standards using the SANC Manual Checklist. The state works with the facility to make edits or changes to the manual. It is important for the state certifying authority to verify the appropriate level of detail be included in the manual. Standards should be met in a broad context, avoiding minor specific details that require continual changes. For example, instead of saying "Wash pots with a 10% bleach solution prior to reuse," it may be more appropriate to say, "All reusable containers are to be treated with an effective disinfectant prior to reuse."

UPDATES TO THE FACILITY SANC MANUAL

Any changes or modifications to the Facility SANC Manual after the initial state certifying authority approval must be approved by the state certifying authority. The individual designated as the facility's SANC program lead in the manual is responsible for communicating any changes and obtaining state certifying authority approval for changes. The updated manual must include a revision number to ensure that the most recent version is used at the facility. Inspectors should keep in mind that the manual should be written broadly so that specific details can be changed without necessitating a revision to the manual.

Critical Decision Point:
Is the manual complete?

Nursery Creates SANC Manual → State Reviews and Approves SANC Manual → Proceed to Audit and Final Approval

Modifications to the Facility SANC Manual must be approved by the state certifying authority

CHAPTER 5: AUDITS

IN THIS SECTION

- Audits Overview
- Systems and Surveillance Audits
- Conducting Audits
- Addressing Non-compliance

AUDITS OVERVIEW

Vocabulary Check

Audit: An assessment of all or part of a nursery or plant production facility, which may include examination of documents, records, inspection of plant material and/or interviews with staff to ensure conformity with the SANC Program Standards and the Facility SANC Manual.

External Audit: An assessment conducted by regulatory officials to verify that a plant production operation is following the terms of its SANC agreement and other agreed upon documentation. This assessment could include records checks as well as a physical inspection of the facility.

The audit process should be developed and conducted to support communication and build trust between the regulatory agency and the facility staff. All audits are to be conducted to correct deficiencies and to verify that requirements identified in the SANC Standards and the Facility SANC Manual are being followed. SANC can only succeed if the audit process and production practices are transparent and state plant regulatory officials (SPROs) and producers nationwide believe in the credibility of the process.

Audits verify that the procedures identified in the Facility SANC Manual are being followed. Internal audits will be conducted by the facility and external audits will be conducted jointly by the grower and your state certifying agency. These audits help to verify that the procedures are being done as documented in the Facility SANC Manual and that the pest management plan is working.

Two types of audits will be performed by the inspector, system and surveillance audits. Successful completion of the initial full systems audit and correction of any areas of non-compliance will allow for the issuance of the SANC agreement between the state regulatory agency and the facility. Continuation of the SANC agreement is dependent on surveillance and systems audits and follow-up responses.

SYSTEMS AND SURVEILLANCE AUDITS

SYSTEMS AUDITS

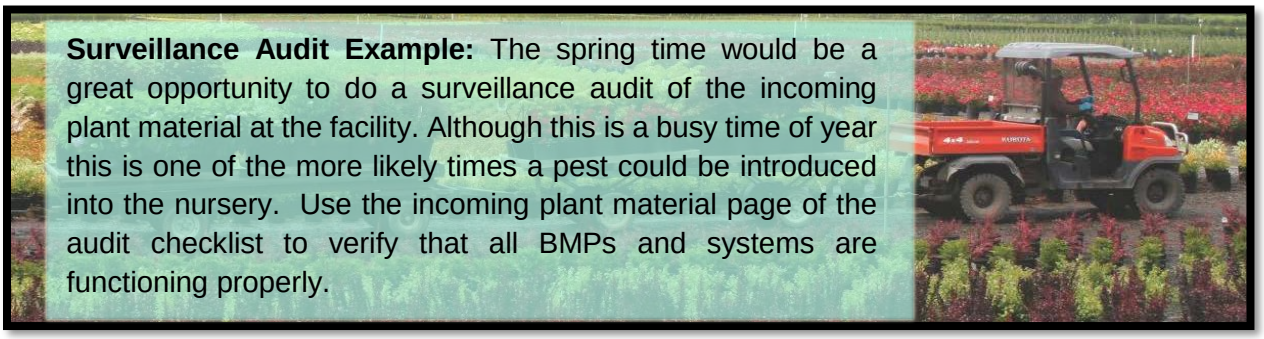
The purpose of the systems audit is to completely review and assess the readiness of a facility to participate in the SANC certification process. This audit is meant to assure that **ALL** aspects (production, water containers, etc.) of a systems approach have been implemented to minimize pest risk and maximize the success of the facility. This audit is to be conducted after the facility manual has been approved by the state regulatory agency and all stakeholders agree that the facility is ready to produce plant material under the approved Facility SANC Manual.

After the initial full systems audit and acceptance into the SANC program a full systems audit is conducted annually as required by the SANC standard to maintain SANC certification.

SURVEILLANCE AUDITS

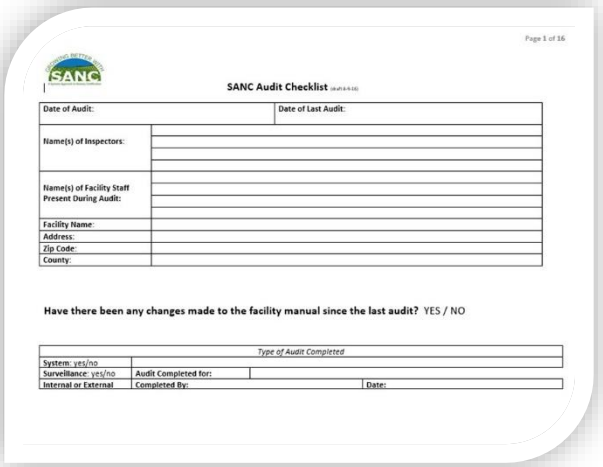
The purpose of the surveillance audit is to periodically assess the facility's compliance with a specific component in the Facility SANC Manual and other agreed-upon documentation. This audit is meant to be a review of a specific system(s) or area(s) of the facility such as water, product, recordkeeping, pest management, etc. Audits that are aimed at verification of a stipulation of a compliance agreement could be considered surveillance audits.

The certifying agency must conduct at least two surveillance audits per year on each SANC facility.



CONDUCTING AUDITS

Prior to any audit, it is important for the inspector to review the Facility SANC Manual and to have open communication with the facility regarding the upcoming audit. The inspector should work with the facility SANC manager to complete an audit checklist that will serve as the guide for the audit process. The checklist also provides the inspector a way to keep notes and to be sure that all items in the Facility SANC Manual that need to be addressed are covered.



SANC Audit Checklist

Date of Audit:	Date of Last Audit:
Name(s) of Inspectors:	
Name(s) of Facility Staff Present During Audit:	
Facility Name:	
Address:	
Zip Code:	
County:	

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

Type of Audit Completed		
System: yes/no		
Surveillance: yes/no	Audit Completed for:	
Internal or External	Completed By:	Date:

Example SANC Audit Checklist

Inspectors should review the example SANC Audit Checklist that can serve as a template from which to work. Additional items can be added or deleted to the checklist depending on the type of operation that you are auditing.

Planning

- Know the program
- Know and study your resources
- Know your purpose
- Have a question strategy
- Prepare for the unexpected

Under a systems approach, pest management within the facility is spread out to all personnel. Each employee's role in the process is defined in the Facility SANC Manual. Audits are an opportunity to confirm the practices in place at the nursery are being followed as designed in the manual. Prior to conducting a SANC audit, inspectors should have been adequately trained and have the resources needed to effectively work through issues with the SANC facility. Each audit should be planned to maximize efficiency and to be respectful of the facility's time and production cycles.

STEP 1: CONTACT THE NURSERY ABOUT CONDUCTING THE AUDIT.

Like all aspects of the SANC process, communication is key. When it is time to conduct the audit, determine whether it is a systems or surveillance audit, be sure to communicate this with the nursery to allow ample time for planning, scheduling and staff availability. Keep in mind peak times for shipping or other seasonal activities.

Keys to Consider

Scope: Identify the scope and type of the audit.

Checklist: Review the audit checklist and complete the coversheet.

Personnel: Identify facility and state staff to be involved in the pre-audit meeting, audit and review of audit outcomes.

Documents: Request and share any documents to be used and reviewed.

STEP 2: ASSEMBLE THE AUDITING TEAM

Once a meeting time and place is confirmed, begin to assemble any additional members of the audit team. This is completely scalable and depends on the size of the operation and the type of audit. Prior to the audit ensure the facility and all audit team members have a current copy of the audit checklist and manual.

STEP 3: PRE-AUDIT MEETING

On the day of the audit meet at the facility. Allow time for introductions, special instructions and dividing of the team with appropriate nursery staff, if needed. Discuss any changes that may have come up since the last audit or the progress of any corrective actions.

Keys to Consider

Introductions: Introduce facility staff and the audit team.

Scope: Lay out the audit plan - reference the audit checklist

Teams: Identify teams (if necessary) and areas of responsibility

Questions: Plan time for audit team members and facility staff to ask questions.

STEP 4: BEGIN AUDIT

As you conduct the audit, consider using different questioning techniques to help get to the root of what you are looking for and to be efficient. Some redundancies in the checklist are okay; changes may be necessary as you progress over time. Follow the checklist and ask the yes or no questions or reword them to allow for the facility staff to explain each answer fully before moving on to the next question.

Keys to Consider

Plan: Review the facility based on the audit plan, checklist, SANC Manual and critical control points/BMPs for the facility

Checklist: Use the audit checklist as a guide for conducting the audit; it was developed based on the Facility SANC Manual.

Input: Gather information from relevant staff. Ask questions that allow staff to fully explain duties, responsibilities and procedures as they pertain to their role with the SANC program

Question: Ask follow up questions to probe any areas of concern

Records: Record findings and results of audit

STEP 5: REVIEW AUDIT RESULTS

Identify and document compliance issues and changes needed to the audit checklist or manual. Set clear deadlines and expectations for when you will have copies of paperwork to the facility and the audit team. Discuss and set realistic deadlines for corrections of compliance issues.

Keys to Consider

Findings: Collect records and review audit findings with the audit team. If necessary, complete any remaining items on the audit checklist.

Non-Compliance: Identify areas of non-compliance and complete a corrective action request form for each instance, when necessary.

Timeline: Identify a timeline for correcting areas of non-compliance.

Review: Review final audit report with facility management

Sign: The facility representative and state certifying authority sign the final audit report

ADDRESSING NON-COMPLIANCE

Vocabulary Check

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.

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, the facility must be suspended from the SANC program.

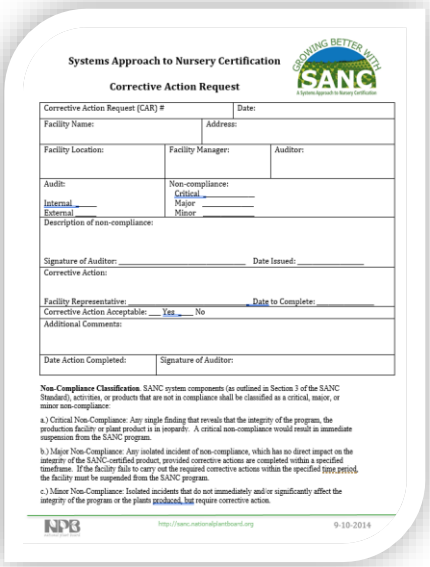
Minor Non-Compliance: Isolated incidents that do not immediately and/or significantly affect the integrity of the program or the plants produced, but require corrective action.

Working with the facility on issues involving non-compliance is part of the state certifying authority's critical responsibilities. The SANC program strives to maintain consistency both within states and from state to state. Upholding the SANC Standards and adherence to the Facility SANC Manual are the primary requirements and the basis for the SANC certification. If non-compliance issues arise with a SANC facility the state inspector must work with the facility to correct the problem in a timely manner and discuss whether changes to the Facility SANC Manual may be needed to prevent the issue from recurring. Non-compliance is defined as any failure of the facility to follow the agreed upon elements in the Facility SANC Manual which are categorized as critical, major and minor in the SANC Standard.

Examples of Non-Compliance by a SANC Program Facility			
Area	**Critical Non-Compliance**	**Major Non-Compliance**	**Minor Non-Compliance**
Mgmt.	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	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	Training Plan not being implemented	A major gap in training content is identified that can't be fixed quickly or 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	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
PMP	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
Pest Mgmt.	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	No internal audits done	Internal audits have failed to uncover significant pest hazards.	Internal audits have been poorly documented.
Records & Document	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	

CORRECTIVE ACTION REQUEST

Corrective Action Requests (CAR) are used by the state certifying authority to communicate and record critical and major non-compliances and their resolution. A CAR must be issued by the state certifying authority to document each critical and each major non-compliance detected.



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:	

Non-Compliance Classification. SANC system components (as outlined in Section 3 of the SANC 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.

NPB http://sanc.nationalplantboard.org 9-10-2014

Corrective Action Request

- The CAR is initiated by the auditor to describe the non-compliance and classify it as critical or major.
- The CAR is signed by the auditor.
- The facility proposes a corrective action to the auditor
- The auditor and facility establish a time frame for completing the corrective action.
- The facility representative signs the CAR.
- The auditor acknowledges the proposed corrective actions and signs the CAR as indicated. When the corrective action is verified as completed by the auditor, the CAR is closed with a final signature.

CHAPTER 6: FINAL APPROVAL

IN THIS SECTION

- Final Steps
- The SANC Agreement
- SANC Logo Use Agreement

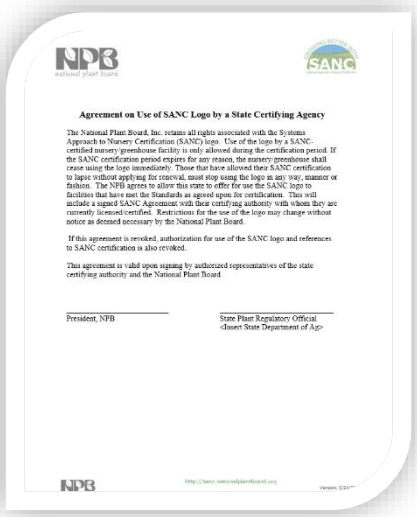
FINAL STEPS

Once the facility has passed the external audit their SANC certification is almost complete. These are the few remaining steps to complete the process and allow the facility to ship under a SANC certificate and utilize the SANC logo:

- The state completes the SANC Logo Use Agreement with NPB. Once the state certifying agency has signed the document, send it to the NPB President for signature. Provide a copy of the signed completed form to your regional plant board representative on the SANC Governing Board.
- Make sure all areas of non-compliance and suggested facility manual and program revisions agreed upon at the end of the external audit are completed.
- Complete the SANC Agreement with the nursery. Once this agreement is signed, provide a copy to your regional plant board representative on the SANC Governing Board.
- Once all the paperwork is signed, the SANC certified facility is ready to start shipping plants using a SANC certificate and can use the SANC logo for advertising and promotion. Electronic versions of the logo will be made available to the once the agreements are completed.

SANC LOGO USE AGREEMENT

The SANC logo is the registered property of the National Plant Board (NPB) and the logo may only be used by an approved facility when the SANC agreement is valid. The logo use agreement is between the state and the NPB and formalizes when the SANC logo can be used by a nursery. The NPB agrees to allow the state to offer for use the SANC logo to facilities that have met the SANC standards. The logo may only be used by facilities during the certification period specified in their SANC agreement.



Agreement on Use of SANC Logo by a State Certifying Agency

The National Plant Board, Inc. retains all rights associated with the Systems Approach to Nursery Certification (SANC) logo. Use of the logo by a SANC certified nursery/greenhouse facility is only allowed during the certification period. If the SANC certification period expires for any reason, the nursery/greenhouse shall cease using the logo immediately. Those that have allowed their SANC certification to lapse without applying for renewal, must stop using the logo in any way, manner or fashion. The NPB agrees to allow this state to offer for use the SANC logo to facilities that have met the Standards as agreed upon for certification. This will include a signed SANC Agreement with their certifying authority with whom they are currently licensed/certified. Restrictions for the use of the logo may change without notice as deemed necessary by the National Plant Board.

If this agreement is revoked, authorization for use of the SANC logo and references to SANC certification is also revoked.

This agreement is valid upon signing by authorized representatives of the state certifying authority and the National Plant Board.

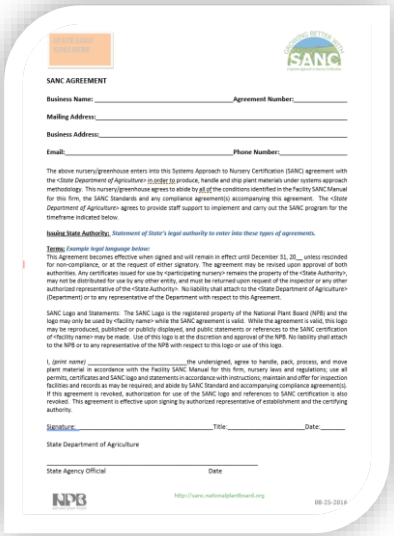
President, NPB

State Plant Regulatory Official
<Insert State Department of Ag>

SANC Logo Agreement

SANC AGREEMENT

Once the Facility SANC Manual has been approved and the full systems audit is complete, the SANC agreement must be signed before the facility officially becomes a program participant. As a partner in the SANC program the facility works together with the state certifying agency to maintain SANC program status and improve pest management systems.



SANC AGREEMENT

Business Name: _____ Agreement Number: _____

Mailing Address: _____

Business Address: _____

Email: _____ Phone Number: _____

The above nursery/greenhouse enters into this Systems Approach to Nursery Certification (SANC) agreement with the <*State Department of Agriculture*> in order to produce, handle and ship plant materials under systems approach methodology. This nursery/greenhouse agrees to abide by all of the conditions identified in the Facility SANC Manual for this firm, the SANC Standards and any compliance agreement(s) accompanying this agreement. The <*State Department of Agriculture*> agrees to provide staff support to implement and carry out the SANC program for the timeframe indicated below.

Issuing State Authority: *Statement of State's legal authority to enter into these types of agreements.*

Terms: *Example legal language below:*

This Agreement becomes effective when signed and will remain in effect until December 31, 20__ unless rescinded for non-compliance, or at the request of either signatory. The agreement may be revised upon approval of both authorities. Any certificates issued for use by <participating nursery> remains the property of the <State Authority>, may not be distributed for use by any other entity, and must be returned upon request of the inspector or any other authorized representative of the <State Authority>. No liability shall attach to the <State Department of Agriculture> (Department) or to any representative of the Department with respect to this Agreement.

SANC Logo and Statements: The SANC Logo is the registered property of the National Plant Board (NPB) and the logo may only be used by <facility name> while the SANC agreement is valid. While the agreement is valid, this logo may be reproduced, published or publicly displayed, and public statements or references to the SANC certification of <facility name> may be made. Use of this logo is at the discretion and approval of the NPB. No liability shall attach to the NPB or to any representative of the NPB with respect to this logo or use of this logo.

I, *(print name)* _____ the undersigned, agree to handle, pack, process, and move plant material in accordance with the Facility SANC Manual for this firm, nursery laws and regulations; use all permits, certificates and SANC logo and statements in accordance with instructions; maintain and offer for inspection facilities and records as may be required; and abide by SANC Standard and accompanying compliance agreement(s). If this agreement is revoked, authorization for use of the SANC logo and references to SANC certification is also revoked. This agreement is effective upon signing by authorized representative of establishment and the certifying authority.

Signature: _____ Title: _____ Date: _____

State Department of Agriculture

_____

State Agency Official Date

NPB http://sanc.nationalplantboard.org 08-25-2016

SANC Agreement

This binding agreement between the plant production facility and the state certification agency identifies 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 the conditions listed in the Facility SANC 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. The facility manager and state certifying authority enter into a SANC agreement that states that the facility will operate according to the SANC Standards and the Facility's SANC Manual.

It is important that each state work with their legal staff and/or administration to customize the SANC agreement into that states accepted format. 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.

SHIPPING TODAY | SANC-CERTIFIED **Plant Material**

All documents referenced in this manual are available on the SANC website at: http://sanc.nationalplantboard.org/