

**Action Item: Identification of need for minimum requirements for states to participate in SANC
(NPB Steering Committee Meeting, St. Louis, May 2016)**

The Systems Approach to Nursery Certification (SANC) is a voluntary program to promote a harmonized risk-based systems approach to enhance nursery certification process while recognizing varying states' authorities and industry needs. One of its many benefits is that it encourages a close working relationship between the state certifying authority and participating facilities (nurseries/greenhouses). While working with the first states in the Pilot Project for SANC, we've identified essential elements that should exist on the state side to better realize a successful SANC program.

Administration

Administrative Needs for a State to Adopt SANC Certification:

- Statutory Authority to provide nursery/greenhouse certification using systems approach methodology
- Commitment at all levels of state administration
- The following are suggested ways for a SPRO be educated in SANC Program:
 - Discussions with other SPROs who have participated in the process
 - Visiting a SANC operation in another state/shadowing SPRO/ reviewing a SANC Manual with a seasoned SPRO
 - Review outreach materials available at sanc.nationalplantboard.org
 - Participation in quarterly meetings/teleconferences with SANC SPROs, hosted by NPB as needed.

It is essential that administration or management staff have a clear understanding of the purposes, requirements and general processes of SANC (<http://sanc.nationalplantboard.org/state-tools/>). SANC brings a different methodology to inspection of a nursery with a shift from the traditional shipment-to-shipment inspections to an audit-based inspection of the operations of the nursery. This can be beneficial when inspection staff resources are limited. Although the key workers in the day-to-day operations at a participating nursery will be the state inspectors, there is an essential role played by the inspection program administrator (State Plant Regulatory Official or delegate). The SPRO approves the request for entry of a potential facility into SANC qualification processes as well as the initial external audit of the nursery which provides the SANC certification of the nursery. Subsequently, the nursery is audited annually through surveillance and systems surveys as determined necessary by the state and conducted by the inspectors. It should be noted that continued success and uniformity of the state SANC Program is dependent on adequate annual surveillance and systems audits of each SANC facility. The SPRO is encouraged to be closely involved in the SANC process as feasible, especially with the first few participating nurseries so as to gain a solid understanding of the program.

Inspectors

For an Effective and Uniform SANC Certification Program, the state needs field staff who:

- Meet state standards for nursery inspection/pest detection
- Have taken the USDA “Introduction to Audit” course
- Have become familiar with state SANC Program responsibilities by:
 - Participating in SANC Inspector training on general SANC concepts, risk assessment, and auditing
 - Shadowing a seasoned SANC Inspector for a suitable period to gain experience
 - Regularly performing SANC surveillance and system audits

The SANC program is a paradigm shift for the inspector and administrators, as well as the nursery. Instead of many trips to a nursery to conduct shipment-by-shipment inspections, the program shifts to inspections to review or audit the SANC-approved growing practices of a nursery (surveillance and system audits). 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 documentation, a SANC-certified nursery identifies how it will grow plants to best minimize pest problems. The local inspector is tasked with auditing that the nursery is following the agreed upon practices and procedures. The belief is that with these best growing practices being followed there is minimal to no risk of an unknown pest problem establishing in a facility nor being spread via plant transport to other locations. The inspector conducts surveillance and system audits of the nursery to ensure adherence to its Facility SANC Manual.

It is important to note that the inspector is involved with the nursery in a much more informed manner than previously. Through participation in a nursery’s risk assessment and then providing assistance in the development of a pest management plan and finally the Facility SANC Manual, a clearer understanding of the nursery’s growing practices are gained by the inspector.

An inspector, based on our Pilot Nurseries Project, may anticipate spending approximately 60 hours to help a nursery reach SANC-certification. This is anticipated to become less as the inspector gains experience with the program.

Inspectors are required to participate in training as offered by the SANC program. Currently, training is offered through specific training sessions held by the National Plant Board as well as training materials at the SANC website (<http://sanc.nationalplantboard.org/state-tools/>).

Bullets to Remember

- Training is essential. Hands-on training opportunities are useful for Inspection staff and results in significant increase in capacity to understand and implement SANC. Particularly important is audit training due to the emphasis on surveillance and system audits--key elements in SANC.
- Communication between all parties—SPRO, Inspectors, and Nursery/Greenhouse Grower—should be regular, thorough and candid. Typically, there are a lot of questions in the beginning stages of working through the SANC requirements.
- A successful SANC program provides many benefits to the facility and state beyond plant pest risk management. Additional gains can be made in facility organizational continuity of operations, early detection of an incipient problem, and documentation of facility operations.