# A Systems Approach to Nursery Certification

## Tools for Growing Better – SANC Documents

### SANC Framework Document
- Describes and defines basic systems approach principles in the context of nursery certification.
- Authored by Wayne Dixon and others, it is available at the SANC website.

### SANC Elements Manual
- Takes SANC principles to the nursery operations level.
- Defines major hazards of pest introduction in a nursery setting.
- Designed to be used as a guide by a nursery interested in SANC certification, in partnership with their certifying agency, to begin development of their own operation-specific manual.

### CCP-BMP Checklist Companion
- Developed jointly by industry and regulatory representatives.
- Offers basic BMPs that can be used to address identified critical control points (CCPs) in a nursery or greenhouse system in order to reduce pest risk.

### Nursery-Specific Operations Manual
- Document developed by the nursery in cooperation with regulators to document expectations and certification compliance.

### SANC Compliance Agreement Template
- Example compliance agreement format for States to address state and federal quarantines and regulations.
- Encourages consistency between states.
- Highlights systems approaches currently being used within the certification process of plants moving interstate.
- Editable to meet specific states needs.

### SANC CCP Checklist / Audit Checklist
- Will help inspectors and growers ensure that CCPs are properly addressed and BMPs are properly utilized.
- Used in combination with the CCP-BMP CHECKLIST COMPANION, it will lead to development of practical means to reduce pest risk while making optimum use of nursery resources.
- Scalable benefits — from helping a small local nursery produce healthier plants to providing compliance verification for a nursery or greenhouse shipping regulated articles interstate or internationally.

### Other Supporting Documents Under Development:
- SANC Q&A
- SANC Glossary of Terms
- NPB Model Laws that incorporate systems approach language

---

[www.sanc.nationalplantboard.org](http://www.sanc.nationalplantboard.org)
A Systems Approach to Nursery Certification

Tools for Growing Better – SANC Documents

SANC FRAMEWORK

Available!

SANC Elements Manual

CCP-BMP Checklist Companion

In Draft

Nursery-Specific Operations Manual

In Draft

Compliance Agreement Template

In Draft

CCP/Audit Checklist

In Draft

National Plant Board Annual Meeting
August 2013, Louisville Kentucky
Demystify the Jargon

Systems Approaches • Integrated Measures
• BMPs • CCPs
Cutting through the jargon.

Joe Bischoff, PhD
Director – Government Relations
American Nursery & Landscape Association

Demystify the Jargon

It all boils down to RISK MANAGEMENT
• Prevent problems coming in
• Monitor and scout crops for issues
• Accurately diagnose pests/diseases
• Treat problems as appropriate
• Avoid shipping pests/diseases

Demystify the Jargon

Integrated Measures
Actions taken during the production process

Systems Approach
Using at least two independent measures, which together appropriately manage risk.

Demystify the Jargon

Critical Control Point (CCPs)
Specific steps in the process where procedures can be applied to most efficiently manage risk – The “What.”

Best Management Practices (BMPs)
Actions taken to address the concerns raised by a critical control point – The “How.”

Voluntary Systems Approach Certification

• Dependent on complexity of operation – Identify specific CCPs – Grower chooses BMP’s (toolbox).
• Growers and inspectors/auditors work together as the operation develops its unique management plan.
• Grower keeps records, which are periodically audited by inspectors.
Voluntary Systems Approach Certification

Better Outcomes

- Prevent the acquisition and spread of Pests & Diseases
- Makes Business Sense
  - Flexible – Allow for tailoring to meet operation needs
  - Efficient – Removes the need for endpoint inspections before shipping
  - Marketing advantage – With a critical mass of participation there is perceived value by customers

Voluntary Systems Approach Certification

- Fits within the context of international standards!
  - The NAPPO standard: RSPM 24
  - The IPPC standard: ISPM 36
- Operations cannot be expected to manage multiple certification standards... interstate, international.
Application by Nursery to Regulatory Agency.

Info Pack with Areas of Critical Control Points (CCPs) to include Exclusion, Mitigation, Detection, Traceability, Recordkeeping, Training and Internal/External Audit Checklists. Also include table of contents template for on-site plan and potential Best Management Practices (BMPs) examples for on-site Pest Management Plan.

Interim on-site meeting between Nursery and Regulatory Official

Assess potential for pest movement
- Plants grown
- Pests indigenous to the area
- Receiving States that have regulations for plant / pest / point of origin

Nursery review of BMP’s to determine those already in place. Review BMP’s that would adequately address the issues of Exclusion, Mitigation, Detection, Traceability, Recordkeeping, training and internal/external audit checklists.

Nursery writes PMP (sometimes called Local Plan) and submits to Regulatory Official for review and acceptance. Once approved the plan should either be sent back to the Nursery or destroyed, because it is a proprietary document.

Begin six month pilot.

At end of pilot an external audit is performed by the Regulatory Official.

Assuming no Critical Non-Conformance, the nursery enters the program and is so listed on the Regulatory Agency website. In the event of a Critical Non-Conformance, a CAR (Corrective Action Request) is issued with a time specified and agreed to by both the nursery and the regulatory official to correct the issue. An additional external audit is then completed. If successful, the nursery is accepted into the program.
Order of events

- The nursery should perform internal quarterly audits dividing all auditable components into four equal parts insuring that every point is covered annually. Findings of these internal audits, and corrective actions taken, should be communicated to the Regulatory Official.

What does it look like?

- The agreement: Very short document that states, "XYZ Nursery License #________ Located in ________ is a Participant in The USPPC with its Local Plan having been reviewed and endorsed by the State Plant Regulatory Official of the State of _____.
- Nursery XYZ will maintain an up-to-date copy of its plan on the premises at all times and will present it to the Regulatory Official at the time of any External Audit.

What does it look like?

- The Local Plan (or PMP): Will vary dramatically in length and complexity based upon many factors including: location, market, product(s) grown, size of operation, number of locations, management type, etc. It must address Exclusion, Mitigation, Detection, Traceability, Recordkeeping, Training and Internal/External Audit Checklists.

What does it look like?

- The Audits: A simple checklist with the internal and external components being identical, except that the internal audit document is divided into four (quarterly) parts that when completed equal the annual external audit document.

What does it look like?

- The communication of Program Participation: this should be incorporated in each State’s and/or Federal Regulatory website and State and National Nursery or Greenhouse Association websites.

National Plant Board
August 6, 2013

Jerry Lee
General Manager Monrovia Nursery
Cairo, Georgia
jlee@monrovia.com