FINAL REPORT OF A MISSION
CARRIED OUT IN
THAILAND
FROM 09 SEPTEMBER TO 18 SEPTEMBER 2008
IN ORDER TO
EVALUATE THE SYSTEM OF OFFICIAL CONTROLS AND THE
CERTIFICATION OF PLANTS FOR EXPORT TO THE EUROPEAN UNION

In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of an endnote.
Executive Summary

This report describes the outcome of a mission carried out in Thailand from 9 to 18 September 2008 in order to evaluate the system of export controls and certification of plants and plant products for export to the European Union (EU). The main objective of the mission was to evaluate the action taken by Thailand in response to the recommendations of mission report DG(SANCO)/8275/2006 concerning the system of official controls and the certification of plants for export to the European Union. The mission team also evaluated the action taken in response to interceptions made by Member States in 2007 and 2008 and action taken in response to interceptions made by the Thai authorities as a result of their official control and examination regime.

The Department of Agriculture (DOA) has taken extensive measures to address the findings and recommendations of the previous FVO mission on this subject. The majority of recommendations can be considered to have been satisfactorily addressed. However, the lack of official controls at the places of production of plants for planting has not been addressed and while steps have been taken to improve the inspections at the main point of exit, a lack of staff and the increasing number of consignments presented for inspection continue to compromise the effectiveness of the controls and compliance with the European Union’s import requirements. The number of interceptions at points of entry to the EU has decreased since the previous mission, however the number of these remains unacceptable.

Follow-up action is taken in response to both internal and EU interceptions. The measures have been strengthened since the previous mission and include the suspension of issuing phytosanitary certificates for the specific exporter/commodity/Member State of destination combination.

Recommendations are made in this report, to address the shortcomings found.
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<th>Explanation</th>
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<tr>
<td>DOA</td>
<td>Department of Agriculture (of the Ministry of Agriculture and Cooperatives)</td>
</tr>
<tr>
<td>EPPO</td>
<td>European and Mediterranean Plant Protection Organisation</td>
</tr>
<tr>
<td>EU</td>
<td>European Union</td>
</tr>
<tr>
<td>EUROPHYT</td>
<td>European Database on Plant Health Information</td>
</tr>
<tr>
<td>FVO</td>
<td>Food and Veterinary Office of the European Commission</td>
</tr>
<tr>
<td>GAP / GMP</td>
<td>Good Agricultural Practice / Good Manufacturing Practice</td>
</tr>
<tr>
<td>harmful organism</td>
<td>Defined in Article 2 (e) of Council Directive 2000/29/EC as ‘any species, strain or biotype of plant, animal or pathogenic agent injurious to plants or plant products’. In the context of this report, this term particularly refers to organisms listed in Annex I Part A Section I and Annex II Part A Section I of Directive 2000/29/EC.</td>
</tr>
<tr>
<td>Lot</td>
<td>a number of units of a single commodity, identifiable by its homogeneity of composition, origin, etc., forming part of a consignment</td>
</tr>
<tr>
<td>NPPO</td>
<td>National Plant Protection Organisation</td>
</tr>
<tr>
<td>OAR</td>
<td>Office of Agriculture Regulation (of the DOA)</td>
</tr>
<tr>
<td>OARD</td>
<td>Office of Agriculture Research and Development (of the DOA)</td>
</tr>
<tr>
<td>Place of production</td>
<td>any premises or collection of fields operated as a single production or farming unit</td>
</tr>
<tr>
<td>Plants</td>
<td>‘living plants and specified living parts thereof, including seeds’ as defined in Article 2(1)(a) of Council Directive 2000/29/EC. This includes cut flowers, vegetables, leaves and foliage.</td>
</tr>
<tr>
<td>PPRDO</td>
<td>Plant Protection Research and Development Office (of the DOA)</td>
</tr>
<tr>
<td>Prohibited plants</td>
<td>those plants and parts of plants listed in Annex III to Directive 2000/29/EC.</td>
</tr>
<tr>
<td>Regulated plants</td>
<td>those plants and parts of plants listed in Annex V Part B (1) and (2) of Directive 2000/29/EC</td>
</tr>
</tbody>
</table>
1 INTRODUCTION

The mission took place in Thailand from the 9 to 18 September 2008 and was undertaken as part of the Food and Veterinary Office’s (FVO) planned mission programme.

The mission team consisted of 2 inspectors from the FVO and 1 National Expert from a Member State.

An opening meeting was held on 9 September 2008 at the headquarters of the Department of Agriculture (DOA) in Bangkok, during which, the objectives and itinerary for the mission were confirmed.

Representatives from the National Plant Protection Organisation (NPPO) accompanied the inspection team throughout the mission.

2 OBJECTIVES OF THE MISSION

The main objective of the mission was to evaluate the action taken by Thailand in response to the recommendations of mission report DG(SANCO)/8275/2006 concerning the system of official controls and the certification of plants for export to the European Union.

The mission team also evaluated the action taken in response to interceptions made by Member States and the Thai authorities, as a result of their official control and examination regime, in 2007 and 2008.

3 LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation, in particular Articles 21 and 27a of Council Directive 2000/29/EC and in agreement with the NPPO.

4 BACKGROUND

This mission was the second mission to Thailand carried out by the FVO on this subject. The report of the previous mission (ref: (DG(SANCO)8275/2006) is available on the FVO website (http://ec.europa.eu/food/fvo/index_en.htm). This report included 5 recommendations and 2 advisory points addressed to the competent authorities. The DOA had submitted comments together with an action plan in response to the recommendations of the previous report; these are published together with the above report.

The FVO has also carried out missions to Thailand in order to evaluate the controls of pesticides in food of plant origin intended for export to the European Union. The report of the most recent mission (ref: DG(SANCO)2008/7840) contains more detailed
information on the competent authorities and the systems for Good Agricultural Practice (GAP) which are referred to in this report.

**4.1 Notifications of Interceptions**

The number of interceptions on plants and plant produce originating in Thailand and notified by Member States to the Commission since 2004 is detailed in the following table:

Table 4.1: Notifications of interceptions of plants and plant produce exported from Thailand recorded in EUROPHYT - 1.1.2004 – 1.9.2008 (Source: EUROPHYT)

<table>
<thead>
<tr>
<th>Year</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of interceptions (all reasons)</td>
<td>424</td>
<td>1,073</td>
<td>1,284</td>
<td>937</td>
<td>578</td>
<td>4,296</td>
</tr>
<tr>
<td>Number of interceptions (presence of harmful organisms)</td>
<td>278</td>
<td>359</td>
<td>418</td>
<td>408</td>
<td>224</td>
<td>1,687</td>
</tr>
</tbody>
</table>

The data indicates that there has been a significant number of interceptions, although the number has fallen since 2006.

**4.2 Production and Trade Information**

Thailand is a major producer and exporter of plants and planting material to the EU. The production of plants for planting, cut flowers and fresh herbs takes place throughout the country. The exports of regulated plants is summarised in the following table. A significant proportion of the total production of regulated host plants is exported to the EU.

Table 4.2: Export of regulated plants from 1 January to 31 December 2007 (Source: OAR). (Figures in parenthesis are for period 1 January 2006 – 30 September 2006)
<table>
<thead>
<tr>
<th>Type of commodity</th>
<th>Name</th>
<th>No. of consignments</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Seeds</td>
<td>Capsicum spp.</td>
<td>27 (14)</td>
<td>3,152 Kg (591)</td>
</tr>
<tr>
<td></td>
<td>Lycopersicon esculentum</td>
<td>112 (22)</td>
<td>9,306 Kg (1,732)</td>
</tr>
<tr>
<td></td>
<td>Zea mays</td>
<td>27 (31)</td>
<td>229 Kg (194)</td>
</tr>
<tr>
<td>Cut flowers</td>
<td>Orchidaceae</td>
<td>20,017 (9,853)</td>
<td>115,341,392 stems (49,656,906)</td>
</tr>
<tr>
<td></td>
<td>Rosa spp.</td>
<td>66 (6)</td>
<td>55 Kg (3,853 stems)</td>
</tr>
<tr>
<td>Vegetables</td>
<td>Apium graveolens</td>
<td>4,748 (1,473)</td>
<td>43,231 Kg (10,338)</td>
</tr>
<tr>
<td></td>
<td>Eryngium foetidum</td>
<td>4,142 (667)</td>
<td>67,723 Kg (8,971)</td>
</tr>
<tr>
<td></td>
<td>Ocimum spp.</td>
<td>19,604 (6,581)</td>
<td>569,559 Kg (160,403)</td>
</tr>
<tr>
<td></td>
<td>Momordica charantia</td>
<td>10,157 (4,595)</td>
<td>250,176 Kg (109,454)</td>
</tr>
<tr>
<td></td>
<td>Solanum melongena</td>
<td>18,249 (9,711)</td>
<td>403,052 Kg (162,055)</td>
</tr>
<tr>
<td>Fruit</td>
<td>Annona squamosa</td>
<td>621 (255)</td>
<td>13,911 Kg (3,444)</td>
</tr>
<tr>
<td></td>
<td>Mangifera indica</td>
<td>10,302 (3,113)</td>
<td>794,056 Kg (258,799)</td>
</tr>
<tr>
<td></td>
<td>Passiflora sp.</td>
<td>330 (109)</td>
<td>37,346 Kg (3,055)</td>
</tr>
<tr>
<td></td>
<td>Psidium guajava</td>
<td>7,856 (3,857)</td>
<td>177,520 Kg (98,698)</td>
</tr>
<tr>
<td></td>
<td>Syzygium sarmarangens</td>
<td>4,239 (2,321)</td>
<td>48,084 Kg (26,621)</td>
</tr>
<tr>
<td></td>
<td>Citrus spp.</td>
<td>54 (79)</td>
<td>783, 549 Kg (58,342)</td>
</tr>
<tr>
<td>Plants for Planting</td>
<td>Orchid Plants</td>
<td>2,949 (1,686)</td>
<td>7,307,898 plants (712,928)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>744,866 flasks (165,427)</td>
</tr>
<tr>
<td></td>
<td>Aquatic Plants</td>
<td>8,383 (1,716)</td>
<td>996,430 plants (305,242 plants)</td>
</tr>
</tbody>
</table>
Data in the above table indicates that there has been a very significant increase in both the number of consignments of regulated plants and plant produce exported to the EU as well as the quantities. The producers of plants for planting met by the mission team said that there is considerable interest in further increasing the number of such exports to the EU.

5 MAIN FINDINGS

5.1 ORGANISATIONAL ASPECTS OF PLANT HEALTH CONTROL

5.1.1 National Plant Protection Organisation
The organisational aspects of plant health control in Thailand were described in detail in the previous report. In summary, the Department of Agriculture (DOA), which is part of the Ministry of Agriculture and Cooperatives, is the National Plant Protection Organisation. At the time of the last mission, three Offices of the DOA had responsibilities relating to plant health although only the first two of these played a significant role.

• The Office of Agricultural Regulation (OAR) is responsible for the control of imports and exports for plant health and the movement of plants and plant products within Thailand, and for their inspection and control of plant pests. OAR inspectors issue phytosanitary certificate for exports.

• The Plant Protection Research and Development Office (PPRDO) is responsible for conducting research and development relating to the control of plant pests, and for the analysis and diagnosis of samples. The PPRDO is responsible for the specific export programmes for seeds, pomelo fruits and the recently introduced export programme for aquatic plants (see section 6.7.4 below). Staff from the laboratories also provide training for OAR and OARD staff and issue publicity and technical information for producers.
• The mission team visited the PPRDO laboratory for nematology and noted that they are equipped to carry out analysis of plant and soil samples, and that the staff met by the team were familiar with the necessary techniques. However, the specialist responsible for the nematology laboratory stated that they were not fully familiar in the use of the techniques and would appreciate the opportunity to exchange experience with other international specialists.

• The Offices of Agriculture Research and Development (OARD) are responsible for carrying out research and development relating to field crops including the control of plant pests, and for the operation of the GAP programmes, including field inspections and advice.

The DOA informed the mission team that in July 2008, a number of institutional changes were implemented to increase the effectiveness of export controls. Responsibility for fumigation facilities is no longer split between the OAR and the PPRDO; the OAR is now responsible for the registration, authorisation and supervision of fumigation facilities and for taking action in response to EU notifications of interception. In addition, the inspection of samples at Suvarnabhumi airport is now carried out by OAR officers and not PPRDO specialists as before.

The DOA has also established a new office in cluster 2 (part of the PPRDO), called the Office of Plant Standard and Certification System. The objective of this office is to act as a focus point on food safety and plant health issues, with particular responsibility for monitoring and updating information on import-export related issues.

5.1.2 Human Resources

The DOA informed the mission team, that since the previous mission, the number of staff employed by the three offices had changed, partially to address shortcomings identified by the previous mission in particular at Suvarnabhumi airport. The OAR has employed 40 additional professional staff and 40 additional support staff to perform plant health duties. The increase in staff is mainly at the plant quarantine station at Suvarnabhumi airport.

The Chief inspector at the Suvarnabhumi airport Plant Quarantine station informed the mission team that there was now 10 full time staff compared to 8 or 9 at the time of the previous mission, and that additional staff were available to assist on request from a pool of 100 trained OAR inspectors. Between the hours of 04.30 to 08.30, 2 inspectors are normally on duty; 5 inspectors from 08.30 – 16.30 and 7 inspectors from 16.30 to 23.00hrs. On average 300 consignments are inspected daily.

The PPRDO has employed 1 additional professional and 1 additional support staff; both perform plant health duties.

The OARD now employs one less professional staff and 104 additional support staff with responsibilities for plant health. 113 of the 458 remaining professional staff now perform plant health duties, compared to 60 previously.

5.1.3 Training and guidelines
The previous mission noted that regular training had been provided, most notably for the OARD staff on crop inspection and pests and diseases, however there were significant shortcomings in the knowledge of inspectors regarding EU import requirements; recommendation (4) of the previous report was to issue up-to-date guidance to inspectors for performing export inspections, and the use of additional declarations. The guidance should include information on EU import requirements.

The OAR has revised its training programme, which now also reflects its new responsibilities. Training is provided to inspectors, producers and exporters and operators of fumigation facilities. Thirteen courses were held in 2007; 6 on fumigation related topics, 5 on pests, plant inspections and regulations and import requirements of importing countries (aimed at the EU), and 1 on inspection techniques and 1 on information, rules and regulation and measures included in DOA notifications. In total 803 officers and individuals from the private sector had attended the training courses. Technical literature, including guidelines and handbooks on inspection had been provided to those who attended the courses. In 2007, the PPRDO provided also 3 training courses for OAR officials and producers and exporters. These courses included the sampling and identification of pests for some plants intended for import and export, insects and zoological pests and their control, and pesticide application techniques. In total 155 officers and individuals from the private sector attended these courses. In 2007 the OARD provided 6 training courses relating to the implementation of GAP system and pest management. In total 549 officers and private individuals attended these training courses.

The mission team noted that all of the inspectors met by the mission team had attended training during 2007. Each had been issued with technical literature including a handbook. All of the inspectors met had also been issued with a Thai language translation of Directive 2000/29/EC and were able to find a complete list of EU regulated plants. However, the mission team noted that there is no system of document control in place to ensure that inspectors only use the most up-to-date guidance. In particular, older versions of the inspectors guidelines, which were found to be still in use, do not include a list of prohibited items or guidance on the additional declarations, both of which are included in the up-to-date manuals. The mission team also noted that inspectors had some difficulty in locating relevant information in their handbooks, or in recalling details of the training courses that they had attended.

5.1.4 Financial resources and fees

There have been no changes to the fees charged for export related duties since the last mission. The fee for the issue of the phytosanitary certificate is approximately €1.

5.2 Legislation

Since the previous mission, the Plant Quarantine Act has been amended and two new notifications have been issued in order to strengthen export and import controls, establish the registration of producers and exporters and to streamline the issuing of phytosanitary
certificates. The DOA stated that the legislation governing export controls has been revised in response to recommendations 3, 4 and 5 of the previous report.

- The Amendment of Plant Quarantine Act B.E.2507 (1964) 3rd Ed. 2551 (2008) updated the regulations concerning plant health in response to changes in circumstances in international trade. This Amendment is partly aimed at regulating the exportation of certain kinds of fresh produce that have been intercepted and reported for non-compliance with EU regulations. Export requirements which would be imposed under this amended act are proposed to the Plant Quarantine Committee for assessment and approval.

- Notification of DOA B.E. 2550 (2007) on Criteria, Procedures and Conditions Set for Registration of Exporters of Fresh Fruits and Vegetables to the European Union. This notification requires that the producers of 32 types of fruit and vegetables must be registered and accredited for GAP. The produce must also be handled only through GMP registered and approved pack houses. The 32 commodities include 26 types of vegetables, 2 of which are regulated by the EU (Basil and Celery), and 6 types of fruit, 2 of which are regulated by the EU (mango and pomelo).

- Notification of DOA B.E. 2550 (2007) on Criteria, Procedures and Conditions set for the Application and Issuance of Phytosanitary Certificate for Exporting Fresh Fruits and Vegetables to the European Union, announced on 14 August 2007. This notification requires that all consignments must be presented for inspection no later than three hours prior to departure of the flight and that all boxes in consignments must be marked with their contents. The notification also establishes the measures that must be taken following an interception in the EU (see section 6.8 below).

- Notification of DOA B.E. 2551 (2008) on Criteria, Procedures and Conditions set for Application, Registration and Certification of Methyl Bromide Fumigation Facilities. This establishes requirements for operators of fumigation facilities to be trained and for fumigation facilities to be registered and certified in order to treat orchid cut flowers destined to the EU (see section 6.3 below). The notification also strengthens the measures that must be taken in case of interception in the EU (see section 6.8 below).

5.3 FUMIGATION FACILITIES

Recommendation (5) of the previous mission report was: *to ensure that appropriate follow-up action can be, and is taken, following internal or EU interceptions; in the case of failure of fumigation, an audit of the operation of the authorised facility should be considered.* In response to this recommendation, the OAR has taken responsibility for the registration, authorisation and supervision of fumigation facilities and has also established a training regime to ensure that all operators are competent to perform the treatments. The OAR is also responsible for the follow-up of internal and EU notifications of interception.

- The mission team visited one orchid cut flower producer in Bangkok province and met the OAR inspector responsible for carrying out inspections of cut flowers and supervision of the fumigation facilities. He had been trained and appeared to be fully
aware of the requirements relating to both. The producer had also attended a training course on EU import requirements and training on carrying out fumigation treatments.

Recommendation (7) of the previous report was to consider: *reviewing the minimum recommended (CTP) fumigation treatment to ensure that it is appropriate under field conditions*. The PPRDO informed the mission team that, following a series of trials, the minimum recommended treatment to eliminate *Thrips palmi* in cut flowers using Methyl bromide, had been confirmed as appropriate for the control of *Thrips palmi* in orchid cut flowers under the field conditions in Thailand.

### 5.4 Export Certification and Traceability

The general export procedures have not changed significantly since the previous mission, except with regards to the 32 fruit and vegetables, which must now originate from GAP registered and accredited producers and be packed only in GMP registered and accredited premises, and the new export scheme for aquatic plants destined to certain EU Member States. Producers and exporters of orchid cut flowers, seeds, pomelo fruit and aquatic plants are required to register with the OAR. The fumigation facilities must be authorised by the OAR. The OAR together with the OARD is responsible for registering and approving producer, exporters and facilities for GAP and GMP.

The application form for issue of a phytosanitary certificate (PQ9), packing list and, where necessary, a fumigation certificate, must be presented at the OAR plant quarantine station in order for the pre-export check to be carried out. The PQ9 includes a section for exporters to record which, if any, pre-export treatment had been applied to plants for planting; there is no official confirmation or communication relating to such treatments.

### 5.5 Implementation of Good Agricultural Practice

The DOA informed the mission team that the roll-out of GAP is seen as an important element in reducing the incidence of harmful organisms in consignments exported to the EU.

- The mission team visited producers of mango fruit, celery and basil cut herbs and one pack house handling regulated fruit and vegetables exported to the EU. These commodities are amongst the 32 that must be produced and handled by GAP registered and approved premises. The producers and the quality assurance staff from the packhouse stated that they received regular visits from the OARD and had been provided with training and technical literature, including the EU import requirements, by the OAR and OARD.

- The producer of mangoes stated that the main pests of concern were thrips, mites and various caterpillars. Fruit flies were controlled by wrapping each fruit, from 40 days onwards, in a purpose made bag which had been introduced by the DOA approximately 5 years before and gave 100% protection against fruit flies. The fruit is traceable to place of production through trade documentation and barcode labelling. The OAR stated that it was not required for the producer to provide a copy
of the GAP certificate to accompany the consignment to the point of exit. The producer stated that the OARD visited several times each year and issued advice on preventative treatments.

- The producer of basil fresh herbs informed the mission team that he was part of a cooperative of 43 producers. The cooperative provided agronomy advice and advice on chemical treatments in accordance with the GAP scheme. The OARD also visits the producer every month to inspect the production site.

- The producer also informed the mission team that one consignment had been rejected by the OAR at the airport, due to the presence of *Bemisia tabaci*, following which, the producer was asked by the OARD to carry out more inspections. The OARD inspectors stated that they had received information on internal and EU interceptions.

5.6 **POINTS OF EXIT**

- The mission team visited two Plant Quarantine Stations in the central area: Bangkok Maritime Port and the Export Plant Quarantine Service Group at Suvarnabhumi airport in Bangkok and noted that:

  o The inspection posts had appropriate inspection and sampling equipment. The Plant Quarantine station at Suvarnabhumi airport is undergoing structural improvements intended to assist the DOA inspectors; two offices and a laboratory for the inspection of samples have been installed since the previous mission. The DOA and the staff met by the mission team stated that this had significantly improved control of the export inspections at busy times and had reduced interruptions from the trade.

  o Technical information and guidelines were available; all inspectors were able to identify relevant pest and diseases although there was little information on sampling and testing procedures. In addition, a poster issued by the DOA with pictures of quarantine pests for the EU, was prominently displayed in all places visited.

- The mission team noted from the inspection records that not all regulated lots in consignments were inspected. In addition, the majority of inspections and phytosanitary certificates issued for the EU were for non-regulated plant produce.

5.7 **EXPORT CHECKS**

The actual system of official checks and certification for export to the EU has not changed significantly since the previous mission; it varies depending on the type of commodity, as detailed below. A new export scheme has been introduced for aquatic plants being exported to three Member States. The OAR reported that there had been a substantial number of harmful organisms found during the pre-export checks (see section 6.8 below).

5.7.1 *Orchid cut flowers*
The system of export checks for orchid cut flowers has not changed since the previous mission; all consignments are subject to fumigation by authorised fumigators, prior to export to the EU. In June 2007, the DOA submitted a request for the EU to consider that the Fast-Track scheme, which involves a reduced frequency of checks of consignments exported by eligible producers, to be considered as providing equivalent protection to the existing Community requirement, for each consignment to be inspected immediately prior to export. At the time of this mission, no decision had been taken and the scheme continues to be used. According to the OAR, 7 exporters were currently authorised to use the Fast-Track scheme, compared to 17 at the time of the last mission. The DOA informed the mission team that there were 37 internal interceptions of live *Thrips palmi* on orchid cut flowers in 2007, of which one involved a Fast-Track exporter. In 2008, to the date of the mission, there had been 12 internal interceptions, none of which involved a Fast-Track exporter.

5.7.2 Other regulated cut flowers; fruit and vegetables

The previous mission report included a recommendation (3) that the system of export controls at Suvarnabhumi airport is reviewed in order to ensure that: there is sufficient time available to enable a meticulous check to be carried out of all regulated plants intended for export to the EU; an appropriate intensity of inspection is performed; the level of this may need to be reviewed in light of interceptions; and in the case that a lot does not comply with EU requirements, that this is removed from the consignment. If this is not possible, then the whole consignment should be considered as infested and therefore ineligible for export.

- The mission team observed pre-export checks of fruit and vegetables being carried out at Suvarnabhumi airport and noted that:
  - Consignments are delivered a minimum of three hours before the loading deadline. However, the quantity of consignments being delivered at peak times was such that the earlier delivery of consignments had not resulted in a notable increase in the amount of time available to inspect each consignment.
  - The contents of the majority of boxes were clearly marked with a label. The OAR removed non-labelled boxes from the consignments for separate inspection and the exporter was warned to include labels in the future.
  - The size of the samples taken consisted of 2% to 5% of each lot.
  - The samples were inspected by two OAR inspectors using appropriate equipment, in the new laboratory.
  - When a live EU quarantine pest was found, the lot was not certified, and was removed from the consignment.
- Controls of citrus fruit and other fruit, for which there are specific requirements in the EC legislation for the place of production, were not within the scope of this mission. Nevertheless, the mission team discussed these requirements briefly with the Thai authorities.
5.7.3 Plants for planting

The previous mission report included two recommendations relating to the export controls for plants for planting; recommendation (1) was to ensure that only those regulated plants and plant products that comply with the additional requirements contained in Annex IV Part A Section I to Council Directive 2000/29/EC are certified for export. This is particularly important for plants for planting. Recommendation (2) was to ensure that the system of export controls is revised to ensure that, where necessary, official controls may be carried out at the place of production, and the use of, appropriate treatments for plants for planting is officially supervised and recorded. The OAR informed the mission team that in general, inspections are not carried out at places of production; plants are inspected at the point of exit, immediately prior to export. However, since the previous mission, all plants for planting must now be subjected to a pre-export treatment, by dipping or spraying with insecticides and fungicides, to ensure that they are free from harmful organisms.

- The mission team noted that the exporter is responsible for determining which treatment and chemicals are applied. There is no official supervision of the treatment; in general most plants for planting are treated by the producer. However, no written confirmation of treatment is required. This is confirmed by the exporter when he applies for an export check. The mission team visited two producers of plants for planting. The producers confirmed that there was significant interest in exporting such plants to the EU, instead of south-east Asia due to the higher prices in the EU.

- One producer specialised in growing certain plants of the Araceae family (Aglaonema spp., Philodendron spp and Anthurium spp) under shade netting. The majority of the plants were produced from tissue culture and are exported at 6 months. The producer stated that he used new potting media and applied weekly imidicloprid treatments against thrips and whiteflies. The mission team noted that the growing media had not been inspected or tested for the presence of harmful organisms before use; it was also stored on the ground. The OAR and the producer indicated that they believed that the treatment regime was sufficient to meet EU requirements. At the time of the mission, no plants had been exported to the EU. The producer stated that he performs a pre-export treatment by dipping the pot in imidicloprid and verbally informs the exporter of the treatment that has been applied.

- The second producer is a specialist in ornamental plants including Euphorbia spp., and Cestrum spp. The producer also exports plants that are produced elsewhere including Bougainvillia spp. The producer stated that he applied a treatment for bare rooted plants by dipping with imidicloprid, malathion and copper based fungicide, and if required, a nematicide. Those plants exported with growing media attached are sprayed instead of dipped.

5.7.4 Aquatic plants
Currently producers of aquatic plants that intend to export are not required to register with the PPRDO. At the time of the mission, based on the export database, 54 producers were on the active list of exporting aquatic plants, out of which 24 were exporting to the EU and other countries and 30 were exporting to non-EU countries only. Following interceptions of harmful organisms on aquatic plants by Germany, Poland and France, the DOA implemented a specific export scheme for these three countries. The PPRDO stated that there had also been 4 interceptions of Radopholus similis in Anubias spp. by the Netherlands, and as a result the scheme would be extended to the Netherlands. At the time of the mission, the PPRDO stated that there had been 727 consignments exported to the EU under this scheme. 80% of the exported plants were Anubia spp. and Vallisnaria spp.

The PPRDO, which is responsible for operating the scheme, stated that the principal requirements are:

- The plants originated in a country free from Amauromyza macolusa and immediately prior to their export, have been officially inspected and found free from Liriomyza huidobrensis, Liriomyza trifolii, Liriomyza sativae, Thrips palmi and Bemisia tabaci.

- Samples have been taken from the place of production and were tested and found free from Radopholus similis. (Radopholus citrophilus does not occur in Thailand).

- The exporter must inform the PPRDO 7 days in advance of the intended export. In the case of continuous exports (i.e. daily) then one inspection will be carried out of all plants intended to be exported, every two months. In the case of occasional exports, then an inspection is carried out every month.

The pre-export inspection consists of a visual inspection for insect pests, and a separate visual inspection and laboratory extraction using a mist chamber, followed by a microscopic examination. The PPRDO stated that the following sampling plan is applied for aquatic plants:

Table 5.1: Sampling plan for Aquatic plants (source: PPRDO)

<table>
<thead>
<tr>
<th>Lot size</th>
<th>No. of samples for visual inspection</th>
<th>No. of samples for laboratory testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 200 plants</td>
<td>All plants</td>
<td>5% - minimum of 10 plants</td>
</tr>
<tr>
<td>201 – 5,000 plants</td>
<td>10% (minimum of 200 plants)</td>
<td></td>
</tr>
<tr>
<td>&gt; 5,000 plants</td>
<td>5% (minimum of 200 plants)</td>
<td></td>
</tr>
</tbody>
</table>

The PPRDO stated that recirculation of water was considered to be a major risk for nematodes and that the use of such systems had been reduced. Exporters are required to have a water treatment facility to ensure that the water used within the nursery is free from nematodes, or to reduce the risk of nematodes being present (for example, through the use of a settling tank).
• The mission team visited one producer and exporter of aquatic plants. The plants are produced mainly from tissue culture and are grown in shallow cement lined pools, which are disinfected with chlorine prior to planting. In 2007, 500,000 plants were exported mainly to the EU, Singapore and Japan. The nursery is equipped with a water treatment plant including carbon filters, ultra-violet steriliser and a 25µm filter. The PPRDO reported that they had taken samples from every lot destined for export at a rate of 10 plants/bench; whole plants, including roots are taken as samples.

  o The producer informed the mission team that an insecticide treatment (imidicloprid) is applied against *Bemisia tabaci*. The PPRDO inspector had last visited on 26 August, when he had found *B. tabaci* and some rotten roots. Recommendations had been left with the producer for appropriate treatments. All plants are subjected to a pre-export treatment using imidicloprid for 10 minutes.

  o The PPRDO records indicated that *Radophilis similis* was found in 10 samples. The PPRDO had issued advice which included: heat treating the growing media (sand/soil) to 60°C or more followed by treatment with 10% - 40% chlorine. No extra sampling or follow-up inspections were carried out and exports from the place of production were still permitted. The producer informed the mission team that he had decided to destroy all plants that had been immersed in the same water – this was not included in the advice issued by the PPRDO. After this first finding, the producer had installed the water treatment facilities and had received training from the DOA nematologist who gave recommendations on the sampling plan and the testing regime, using mist chambers and a microscope, to be used.

  o The PPRDO records indicated that on 16 May 2008, 2 of 84 lots were found to be infested with *Hirschmanniella* spp as a result of the pre-export inspection. The PPRDO stated that the nematodes found originated from the stock plants, as the two affected varieties were not directly derived from tissue culture.

5.7.5 Phytosanitary certificates and additional declarations

Phytosanitary certificates are issued only by OAR staff following completion of a plant health check. Since the previous mission, the OAR has issued guidelines for inspectors and exporters on appropriate additional declarations, including 'appropriate treatments', for inclusion on phytosanitary certificates. The DOA informed the mission team that they had received conflicting advice from Member States on the format to be used for the additional declarations (full text, or listing of relevant references from Directive 2000/29/EC) and had included this in the guidelines.

• The mission team noted that while the additional declarations on the phytosanitary certificates were generally in accordance with EU requirements, declarations were included, for plants for planting, which, due to the lack of official inspections at places of production, could not be substantiated. In particular for nematode sampling of ornamental plants and inspections in places of production for freedom
from *Bemisia tabaci*.

### 5.8 Interception by the OAR and Follow-up of Notifications of Interception from Member States

The OAR informed the mission team that since the previous mission, the system for communicating information relating to internal and EU interceptions had been revised. Information is now circulated to all relevant DOA agencies (OAR, PPRDO and the OARD) using a standard form. The OARD inspectors met by the mission team stated that it had increased awareness and inspections would be targeted as a result of the interception data. As previously, each interception is formally notified to the relevant exporter and packing facility.

#### 5.8.1 Interceptions by the OAR

The table below provides details of the interceptions made by the OAR in 2005 and 2006, in lots intended for export.

<table>
<thead>
<tr>
<th>Commodity</th>
<th>Number of Interceptions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2007</td>
</tr>
<tr>
<td>Fruit and vegetables</td>
<td>3,960</td>
</tr>
<tr>
<td>Orchid cut flowers</td>
<td>37</td>
</tr>
<tr>
<td>Ornamental plants</td>
<td>27</td>
</tr>
<tr>
<td>Aquatic plants</td>
<td>14</td>
</tr>
<tr>
<td>Other</td>
<td>-</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>4,038</strong></td>
</tr>
</tbody>
</table>

Based on the data in Table 5.2, above on the number of consignments exported to the EU during 2007, the approximate percentage of consignments intercepted is: 5% for fruit and vegetables, 0.2% for orchid cut flowers, 0.6% for ornamental plants and 0.2% for aquatic plants.

#### Table 5.3: Type of non-compliance found at point of exit in 2007 & 2008 *(source: OAR)*

<table>
<thead>
<tr>
<th>Commodity</th>
<th>Non-compliance Type</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2007</td>
</tr>
<tr>
<td>Fruit and vegetables</td>
<td>3,960</td>
</tr>
<tr>
<td>Orchid cut flowers</td>
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<tr>
<td>Aquatic plants</td>
<td>14</td>
</tr>
<tr>
<td>Other</td>
<td>-</td>
</tr>
</tbody>
</table>
### Table: Number of Interceptions by Reason

<table>
<thead>
<tr>
<th>Reason</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Presence of harmful organism</td>
<td>3,857</td>
<td>2,376</td>
</tr>
<tr>
<td>Not declared in export plant list, or PQ9</td>
<td>24</td>
<td>75</td>
</tr>
<tr>
<td>Prohibited plants</td>
<td>91</td>
<td>48</td>
</tr>
<tr>
<td>Other reasons (wood packing material not treated as required – ISPM 15)</td>
<td>66</td>
<td>10</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>4,038</strong></td>
<td><strong>2,509</strong></td>
</tr>
</tbody>
</table>

The OAR stated that action was always taken following an internal interception; the affected lots are removed from the consignment and the exporter is notified in writing of the interception and the EU requirements. This information is now also copied to the OARD and PPRDO.

- The mission team examined records of action taken following discovery of non-compliance; in each case the exporter had been notified in writing of the interception and the reasons for it.

- The mission team observed export checks being carried out at Suvarnabhumi airport and the remedial action taken following interceptions. The affected lots were removed; the OAR officers stated that the introduction of the 3 hour minimum period to present the consignment and the compulsory labelling of boxes had helped to ensure that non-compliant lots could now be removed.

5.8.2 Follow-up of notifications of interception from Member States

The OAR informed the mission team that the measures to be taken following an interception by an EU Member State had been strengthened following the adoption of new notifications, as detailed in section 5.2 above.

The following action had been taken since August 2007 following receipt of notification of interception from Member States in accordance with Notification of DOA B.E. 2550 (2007) on Criteria, Procedures and Conditions set for the Application and Issuance of Phytosanitary Certificate for Exporting Fresh Fruits and Vegetables to the European Union.

1. Export of prohibited plants and plant products, and consignments not declared on PQ9;

- 1st and subsequent findings: refusal to issue phytosanitary certificates for that exporter, for consignments destined to the notifying Member State, for a period of 30 days from the date of the DOA notifying letter to the exporter. 31 exporters (5
exporters (presence of prohibited items) and 26 exporters (no phytosanitary certificate applied for)) were subjected to such measures.

(2) Finding of harmful organisms in consignments;

- 1st notification from EU: DOA will send warning letter to the exporter. 37 exporters were subject to such measures.
- 2nd notification: DOA officials visit packing facility to provide suggestions/recommendations on grading and pest inspection. 13 exporters were subject to such measures.
- 3rd and subsequent notifications: refusal to issue phytosanitary certificates for that particular exporter or packing facility to the notifying country for a period of 15 days from the date of DOA notifying letter. 6 exporters were subject to such measures.
- The mission team visited a pack house that had been involved in handling three consignments that had subsequently been intercepted in the EU due to the presence of two different harmful organisms. The OAR informed the mission team that a follow-up visit had been carried out by an OAR official who had made recommendations. These included:
  - A detailed examination of incoming consignments and that these should be rejected if harmful organisms are found.
  - Changes to the washing and packing lines
  - Increased screening in the packing house, including the use of magnifying lenses for inspections.

(3) The following action had been taken following interceptions of _Thrips palmi_ in consignments of orchid cut flowers, both at the point of exit and in the EU, in accordance with Notification of DOA B.E. 2551 (2008) on Criteria, Procedures and Conditions set for Application, Registration and Certification of Methyl Bromide Fumigation Facilities.

- 1st finding: temporary suspension of issuing phytosanitary certificate from the date of the DOA notifying letter. 20 Subsequent fumigations must be carried out under supervision of the DOA. 3 exporters (3 fumigation providers) were subject to such measures.
- The OAR informed the mission team that they had carried out investigations following internal and EU interceptions, including on-site inspections of fumigation facilities. As a result of this follow-up action the OAR had found, in one case, that the door of a fumigation chamber was not sealing correctly and that the necessary concentration of Methyl Bromide could not be maintained. Corrective action was required before the facility was authorised to perform fumigation treatments.
- The mission team examined records of the action taken, including the issue of notification letters by the DOA, and noted that it was in accordance with the above notifications.

5.9 PASSENGER BAGGAGE CONTROLS
The OAR stated that since the previous mission the retailers at the airport had been advised of the EU import requirements and provided with technical literature.

6 CONCLUSIONS

6.1 ORGANISATIONAL ASPECTS OF PLANT HEALTH CONTROL

There have been no significant changes to the structure of the Department of Agriculture since the previous mission. The PPRDO appeared to have adequate technical facilities, however the nematologists may benefit from an exchange of experience with other international specialists.

Additional staff have been recruited, especially to the OAR, since the previous mission. However, the number of consignments being exported to the EU has increased substantially and the sheer volume of consignments requiring inspection at Suvarnabhumi airport, means that even with these additional staff, not all regulated lots in consignments are inspected.

The DOA has developed an extensive training programme on export related topics and a range of technical literature and guidelines for inspectors and the trade. The general awareness of EU import requirements for plant health was much improved, and recommendation (7) from the previous report can be considered to have been satisfactorily addressed in this respect. However, the guidelines appeared to be difficult for some inspectors to follow and a lack of document control meant that out of date manuals were still in use; these did not include a list of prohibited items. Recommendation (4) of the previous report; to issue up-to-date guidance to inspectors, cannot yet therefore be considered to have been satisfactorily addressed.

6.2 LEGISLATION

The DOA has implemented legislation that has strengthened the export controls and the measures to be taken in the event of non-compliance or an interception by an EU Member State. This legislation means that officials have adequate powers to carry out their duties and provides the legal basis to improve inspections carried out at Suvarnabhumi airport, in particular regarding the time available for inspection and the labelling of boxes. It also provides a firm basis for improvements in the fumigation of orchid cut flowers.

6.3 FUMIGATION FACILITIES

Operators are required to attend training, which addresses one of the shortcomings found during the previous mission. The OAR has carried out follow-up action following notifications of interception by an EU Member State. Recommendation (5)(a) of the previous report can therefore be considered to have been satisfactorily addressed.

The PPRDO has, in response to recommendation (6) of the previous report, carried out
field trials to assess the recommended fumigation treatment for orchid cut flowers. According to the PPRDO, this treatment provides appropriate control of *Thrips palmi* under field conditions in Thailand. Recommendation (7) from the previous report has therefore been addressed.

6.4 **Export certification and traceability**

The export process is clear and harmonised between plant quarantine stations. There is no requirement for the GAP certificates or registration number to be provided by the producers or pack houses, however there was adequate traceability of consignments using standard trade documentation.

Producers are not required to provide a written statement of the treatment that has been applied to plants for planting and the treatment is not officially supervised. This means that it cannot be ensured, at the point of exit, that an appropriate treatment has actually been applied. The accuracy of the details of treatments included on phytosanitary certificates, for example as required by item 36.1 (c) of Annex IV Part A Section I to Directive 2000/29/EC therefore cannot be ensured either.

6.5 **Implementation of good agricultural practice**

The roll-out of GAP within Thailand has continued. This should be beneficial with regards to traceability and official supervision of producers and pack houses as well as increasing the provision of technical information and general awareness and suppression of harmful organisms, including those of concern to the EU.

6.6 **Points of exit**

There has been no change in the number of points of exit since the last mission. The plant quarantine stations have appropriate inspection and sampling equipment to enable export checks to be carried out. In addition, there have been improvements to the plant quarantine station at Suvarnabhumi airport, which should help in ensuring that appropriate pre-export check can be, and are carried out.

Technical literature and guidelines on EU import requirements and relevant harmful organisms have been issued and inspectors have been trained to perform export checks.

6.7 **Export checks**

The majority of export checks are carried out on material not regulated by the EU. The OAR stated that it up to 5% samples will be drawn of each lot, although in practice at Suvarnabhumi airport, where most exports to the EU take place, the intensity of the observed check was usually between 2 to 5%.

There are currently no international standards concerning intensity or frequency of sampling however EPPO's Phytosanitary Procedure on sampling of consignments *(Phytosanitary Procedures, Sampling of consignments for visual phytosanitary inspection, PM3/65, European and Mediterranean Plant Protection Organisation, EPPO)*
Bulletin, 36(1), pg. 195, April 2006) provides detailed guidance on this subject and an analysis of probability of detecting infested cargo. Sampling of all but small lots, at a rate of 5% does provide a reasonable probability of detecting harmful organisms in such lots. Sampling small lots at the same rate does not provide a satisfactory probability of detection. The OAR did however report a substantial number of internal interceptions in consignments subject to certification, even using such a small level of sampling.

The recent legislation should assist in the control and inspection of consignments, especially with regards to the earlier delivery of consignments and the mandatory labelling of boxes. However, the sheer number of consignments arriving at peak times, and the lack of staff noted above means that the OAR cannot ensure that an appropriate level of inspection is carried out; in particular, that all lots of regulated material are inspected.

### 6.7.1 Orchid cut flowers

All consignments are fumigated with Methyl Bromide prior to export, which is in accordance with the requirements of paragraph 1(b) of the Annex to Decision 98/109/EC. With the exception of the Fast-Track scheme, a systematic check is carried out for each consignment of cut flowers, which is in accordance with item 36.2 of Annex IV Part A Section I to Directive 2000/29/EC. Once an exporter has been accredited under the Fast-Track scheme, consignments are only inspected at random. This is not in accordance with item 36.2 of Annex IV Part A Section I to Directive 2000/29/EC. A request for the Fast-Track scheme to be considered as providing equivalent protection has been submitted to the Commission.

### 6.7.2 Other regulated cut flowers, fruit and vegetables

Other regulated cut flowers, fruits and vegetables are inspected at the plant quarantine station immediately prior to export, which is, in many cases, in accordance with Directive 2000/29/EC. As noted above, there is no official system in place to ensure that any additional requirements, for example, an 'appropriate treatment', specified in Directive 2000/29/EC have been complied with before the phytosanitary certificate is issued.

The number of interceptions at points of entry to the EU has decreased since the previous mission, however the number of these remains unacceptable.

### 6.7.3 Plants for planting

With the exception of aquatic plants destined to three Member States, no official controls are carried out at places of production of plants for planting. The lack of inspections at places of production means that exports of those plants for which there are requirements for inspections at place of production do not comply with Directive 2000/29/EC. In particular this relates to herbaceous plants, in respect to *Bemisia tabaci* (item 45.1 of Annex IV Part A Section I to Directive 2000/29/EC) and those plants for which there are specific requirements for example: *Araceae* and *Musaceae* plants in respect to *Radopholus similis* (item 18 of the same Annex). In addition, the specific requirements relating to growing medium, in item 34 of the same Annex, have not been complied with. Recommendations (1) and (2) of the previous mission have therefore in this respect not
been satisfactorily addressed.

All plants for planting are required to be subject to an appropriate treatment prior to export. This is done by either the producer or exporter; the plants are then inspected at the point of exit immediately prior to export. While such a treatment is in accordance with the requirements for certain plants and harmful organisms, for example items 32.1, 32.2, 32.3 and 36.1 of Annex IV Part A Section I to Directive 2000/29/EC, these treatments are not officially supervised and no written confirmation of treatments is required to be issued by the producer. There is therefore only limited assurance that the treatments have been applied and applied correctly. Recommendation (2) of the previous report was that "the use of appropriate treatments for plants for planting [should be] officially supervised and recorded" and cannot be considered to have been satisfactorily addressed.

6.7.4 Aquatic plants

A system has been established for the export of aquatic plants to three EU Member States. The conditions of the scheme do not include all of the requirements in Annex IV Part A Section I to Directive 2000/29/EC that relate to herbaceaous plants, for example item 45.1 relating to place of production freedom from *Bemisia tabaci* for a defined period of time prior to export. The new scheme includes testing for nematodes; representative samples of soil and roots are taken from places of production, however exports from the place of production are still permitted even if *Radopholus similis* is confirmed to be present in one or more of these, which is not in accordance with item 18(b) of Annex IV Part A Section I to Directive 2000/29/EC.

The establishment of a specific scheme which (partially) satisfies relevant EU requirements, but applies to only three Member States, suggests that there is a fundamental misunderstanding of Directive 2000/29/EC, the requirements of which apply to imports to all 27 EU Member States.

6.7.5 Phytosanitary certificates and additional declarations

There is adequate security regarding the storage and issue of phytosanitary certificates. Guidance has been provided for inspectors on the use of additional declarations and the additional declarations used on phytosanitary certificates appeared to be in accordance with EU requirements. In this respect, recommendation (4) of the previous mission report has been addressed, however, the absence of official inspections at places of production of plants for planting and the lack of control regarding "appropriate treatment", mentioned in chapter 6.7.3. above means that declarations relating to inspections at places of production and appropriate treatments, for instance, item 45.1 of Annex IV Part A Section I of Directive 2000/29/EC are not valid for inclusion on phytosanitary certificates. In this respect it must be concluded that recommendation (4) has not been satisfactorily addressed. It is not acceptable to issue certificates unless the relevant requirements have been complied with.

6.8 Interceptions by the OAR and follow-up of notifications
**INTERCEPTION FROM MEMBER STATES**

The OAR formally notifies exporters following ‘internal’ and EU interceptions; this information is also copied to the relevant DOA services. The OAR has also strengthened the action that it takes in response to notifications of interception received from Member States - although it does not seem expedient, from a point of view of protecting the EU, to refuse defaulting exporters phytosanitary certificates only for the EU Member State that intercepted one of their consignments and not for the entire EU. Follow-up action has also been taken following EU interceptions of *Thrips palmi* in orchid cut flowers. Recommendation (5) in the previous report has been satisfactorily addressed.

**6.9 PASSENGER BAGGAGE CONTROLS**

Information has been provided to retailers at the airport, which addresses the advisory point (7).

**6.10 OVERALL CONCLUSION**

The DOA has taken extensive measures to address the findings and recommendations of the previous FVO mission on this subject. The majority of recommendations can be considered to have been satisfactorily addressed. However, the lack of official controls at the places of production of plants for planting has not been addressed and while steps have been taken to improve the inspections at the main point of exit, a lack of staff and the increasing number of consignments presented for inspection continue to compromise the effectiveness of the controls and compliance with the European Union’s import requirements. The number of interceptions at points of entry to the EU has decreased since the previous mission, however the number of these remains unacceptable.

Follow-up action is taken in response to both internal and EU interceptions. The measures have been strengthened since the previous mission and include the suspension of issuing phytosanitary certificates for the specific exporter/commodity/Member State of destination combination.

**7 CLOSING MEETING**

A closing meeting was held at the Department of Agriculture in Bangkok on 18 September, during which the main findings and preliminary conclusions of the mission were presented; these were provisionally accepted by representatives of the DOA.

**8 RECOMMENDATIONS**

The competent authority in Thailand is recommended to:

<table>
<thead>
<tr>
<th>No.</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>ensure that only those regulated plants and plant products that comply with the additional requirements contained in Annex IV Part A Section I to Council Directive 2000/29/EC are certified for export. This is particularly important for</td>
</tr>
<tr>
<td>No.</td>
<td>Recommendation</td>
</tr>
<tr>
<td>-----</td>
<td>----------------</td>
</tr>
<tr>
<td>2</td>
<td>ensure that the system of export controls is revised to ensure that, where required in Annex IV Part A Section I to Directive 2000/29/EC, official controls are carried out at the place of production and the use of, appropriate treatments for plants for planting is officially supervised and recorded. This applies to exports to all Member States of the European Union.</td>
</tr>
<tr>
<td>3</td>
<td>ensure that the level of staffing and the system of export controls at Suvarnabhumi airport is reviewed in light of the significant increase in the number of consignments exported to the EU and the current, unacceptable, level of interceptions, in order to ensure that there is sufficient time available to enable a meticulous check to be carried out and that all lots of regulated plants intended for export to the EU are inspected.</td>
</tr>
<tr>
<td>4</td>
<td>ensure that the intensity of sampling used, provides a reasonable probability of detecting harmful organisms, particularly in small lots, intended for export to the EU. To that effect, the EPPO standard referred to in chapter 6.7 can be used as a guide.</td>
</tr>
<tr>
<td>5</td>
<td>consider introducing a document control system, to ensure that inspectors are using up-to-date guidelines and instructions.</td>
</tr>
<tr>
<td>6</td>
<td>consider reviewing the practice of issuing phytosanitary certificates for consignments of non-regulated plants intended for export to the EU</td>
</tr>
</tbody>
</table>

The competent authority in Thailand is invited to provide, within 25 working days of receipt of the report, an action plan containing details of the actions taken and planned, including deadlines for their completion, to address the above recommendations.

The competent authority's response to the recommendations can be found at:


9 ENDNOTES

<table>
<thead>
<tr>
<th>Concerning</th>
<th>Detail</th>
</tr>
</thead>
</table>

22
### ANNEX 1 - LIST OF LEGISLATION REFERENCED IN THE REPORT

<table>
<thead>
<tr>
<th>Reference</th>
<th>OJ Ref.</th>
<th>Detail</th>
</tr>
</thead>
</table>